



MIGRANT RIGHTS
CENTRE IRELAND

Child Protection Policy

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Introduction

Children and young people are a particularly at-risk population and are often those most vulnerable to neglect, poverty and abuse in our society. While the primary responsibility for the care of children rests with their parents or guardians, everybody engaging or working with children has a responsibility for their well-being and protection. In any interaction with children, direct or indirect, the welfare and best interests of the individual child are of paramount importance and must come first in all circumstances. All personnel involved in organisations working with families must therefore be alert to the possibility of child neglect, child abuse and aware of the correct procedures for reporting any reasonable suspicions or concerns¹, where a child's needs aren't being met or their welfare is at risk.

Migrant Rights Centre Ireland (MRCI) is aware of its obligations in this regard and is fully committed to ensuring that all its work, engagements or interactions with children takes place in a safe and protected environment. The following pages contain the '*Migrant Rights Centre Ireland's Policy and Guidelines for Child Protection*.' Our policy has been developed in line with the *Children First - National Guidelines for the Protection and Welfare of Children* (hereafter Children First Guidelines).

1. It promotes a *Code of Conduct* for both our staff, fellows, students on placement and volunteers in their work with children and their families.
2. It provides guidance for staff, fellows, students on placement and volunteers on dealing with any disclosures which may arise through their interaction with children. This interaction may be via a family member or legal guardian.
3. It details the procedures for reporting any such child protection or welfare concerns. It also sets out the safe procedures to be followed by MRCI in areas such as recruitment and management of new and existing staff and volunteers. These procedures are designed not only to protect children but also to protect staff and volunteer members of our organisation by minimising the potential for allegations of misconduct or the possibility of misunderstanding.

Throughout our work MRCI strives to ensure that children and young people who access our service and are active in the work of MRCI, are safe from harm and the organisation believes best interests of are paramount. Our guiding principles are underpinned by *Children First: National Guidance for the Protection and Welfare of Children 2017*, *Tusla's Child Safeguarding: A Guide for Policy, Procedure and Practice*², the United Nations Convention on the Rights of the Child³ and current legislation such as the Children First Act 2015⁴ and the National Vetting Bureau Act 2012⁵.

¹ [Department of Children, Disability and Equality Children First: National Guidance for the Protection and Welfare of Children 2017](https://www.gov.ie/en/department-of-children-equality-disability-integration-and-youth/publications/children-first-national-guidelines-for-the-protection-and-welfare-of-children-2017/) Available at: <https://www.gov.ie/en/department-of-children-equality-disability-integration-and-youth/publications/children-first-national-guidelines-for-the-protection-and-welfare-of-children-2017/>

² https://www.tusla.ie/uploads/content/Tusla_-_Child_Safeguarding_A_Guide_for_Policy,_Procedure_and_Practice.pdf

³ <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

⁴ <https://www.irishstatutebook.ie/eli/2015/act/36/enacted/en/html>

⁵ <https://www.irishstatutebook.ie/eli/2012/act/47/enacted/en/html>

In accordance with the requirements of above, the Board of Management of MRCI has agreed the Child Protection Policy set out in this document. This statement has been developed not only to protect children and young people in our service but also families, staff, fellows, students on placement and volunteers engaged in the work of MRCI.

Responsibility for the Policy:

1. MRCI's Designated Liaison Person (DLP) is Sancha Magat, Information and Support Centre Manager, sancha@mrci.ie 01 8897570. The DLP will hold responsibility for oversight of the policy, implementation of the policy is the responsibility of all team members. The responsibility to review of the Policy every two years will extend to the DLP.
2. The Deputy Designated Liaison Person (DDLDP) is the Information and Support Centre Caseworker Daniel Korolev daniel@mrci.ie 01 8897570.
3. The Child Protection Officer, is Hilary Royston, Director of Finance and Operations

Scope of Application of the Policy

All staff, fellows, volunteers, and students on placement shall be made aware of this policy and the procedures herein. The policy applies equally to existing and newly recruited staff, Fellows, students on placement and volunteers working with children and young people, all of whom must follow the policies and procedures outlined within the guidelines.

Not all positions at MRCI involve regular and direct or indirect interaction with children and their families. This is outlined in MRCI's garda vetting policy and Child Safeguarding Statement. It is the responsibility of management to ensure that all staff members, fellows, students on placement and volunteers, both current and new:

- Receive a copy of the *Policy and Guidelines for Child Protection and Child Safeguarding* statement
- Undergo child protection related training, which stresses the importance of child protection and encourages staff members, fellows, students on placement and volunteers to act on any reasonable concern which they may have. During this training the *Policy and Guidelines for Child Protection* are to be reviewed in order to ensure that all staff members and volunteers are aware of the procedures and commitments contained therein.
- Understand and sign the *Code of Conduct for Staff*

Setting the Context - Migrant Rights Centre Ireland's work with Children and Young People

MRCI is a national organisation working to promote justice, empowerment and equality with migrant workers and their families. MRCI operates a national Information and Support Centre providing information and support to migrant workers and their families mainly in relation to

immigration and workplace rights. We combine frontline services, policy, legal advocacy and campaigning with community and youth work principles, that builds the critical participation of migrant workers and seeks to support their leadership on migrant rights issues.

MRCI does not have a targeted programme of work for children and young people. MRCI comes into contact, either direct or indirect with children and young people through 1) our national Information and Support Centre and case work that supports migrant families; 2) through our campaigning, community work and outreach activities or events where parents are occasionally joined by their children; 3) whereby a disclosure is made to member to member of staff during the course of their work.

Much of MRCI's current work in the area of children and young people is focussed on promoting best practices for the protection of the rights of children and young people of migrant families. MRCI operates an Information and Support centre which provides information, support and assistance to migrant workers and their families on the following areas – of which the list is not exhaustive – immigration, workplace rights, trafficking, homelessness and access to services.

MRCI staff members primarily engage with dependent children of adult migrant workers – documented and undocumented - whose stay and rights in Ireland depend on their parents' migration status or an outstanding application for protection or right to remain. Children may for example be living in poverty, homeless accommodation, or Direct Provision Accommodation Centres – all of which have a considerable effect on their personal growth, development, and childhood experience. Moreover, children living in homeless accommodation or Direct Provision often live in close settings with other adults with whom they are not familiar. While principally it is the responsibility of the parents or guardians to ensure the care and protection of their children in these settings, staff members and volunteers of MRCI should also be alert to the particular circumstances of these centres in which children may be vulnerable to abuse or their welfare and well being at risk.

MRCI stresses the vulnerability of children and young people who are often in legal limbo as a result of the irregular migration status of their parents or an outstanding asylum claim. Undocumented children and young people in the care of the State are a particular vulnerable cohort of our society. They are particularly at risk, due to the nature of their immigration status and lack of legal guardian. MRCI staff members and volunteers need to be cognisant of this in their work when engaging with such children, and to be aware of the measures in place, such as statutory obligations on the State's behalf, when supporting such cases.

MRCI is very concerned about the impact on the mental health and personal development of undocumented children and young people, and in particular that their status is dependent on that of their parents.

By their very nature, children and young people who are present in Ireland to seek asylum or permission to remain in the State on the basis of separation from their primary, habitual caregiver, it is likely that in many cases they have, to some extent, experienced trauma. In extreme cases, separated children may be suffering from psychological or anxiety disorders such as Post Traumatic Stress Disorder (PTSD). MRCI staff members and volunteers need to be conscious and respectful of this in their work with separated children. Vigilance is also required in relation to children who may present with adults who are not their parents or guardians but claim to be so. These children may have been trafficked into the country for purposes of exploitation.

The concern of MRCI also extends to children and young people who have received permission to remain in the State and require added support throughout the complicated legal process to follow in seeking access to social services and integration.

Definition of Abuse

Child abuse can be categorised into four different types: neglect, emotional abuse, physical abuse and sexual abuse.

A child may be subjected to one or more forms of abuse at any given time. Abuse and neglect can occur within the family, in the community or in an institutional setting. The abuser may be someone known to the child or a stranger and can be an adult or another child. In a situation where abuse is alleged to have been carried out by another child, you should consider it a child welfare and protection issue for both children, and you should follow child protection procedures for both the victim and the alleged abuser. The important factor in deciding whether the behaviour is abuse or neglect is the impact of that behaviour on the child rather than the intention of the parent/carer. The definitions of neglect and abuse presented in this section are not legal definitions. They are intended to describe ways in which a child might experience abuse and how this abuse may be recognised.

Child Neglect

Child neglect is the most frequently reported category of abuse, both in Ireland and internationally. Ongoing chronic neglect is recognised as being extremely harmful to the development and well-being of the child and may have serious long-term negative consequences. Neglect occurs when a child does not receive adequate care or supervision to the extent that the child is harmed physically or developmentally, psychologically or emotionally. It is generally defined in terms of an omission of care, where a child's health development or welfare is impaired by being deprived of food, clothing, warmth, hygiene, medical care, intellectual stimulation or supervision and safety. If you think a child is in immediate danger and you cannot contact Tusla, you should contact the Gardaí without delay. In this Guidance, 'a child' means a person under the age of 18 years, who is not or has not been married.

Emotional neglect may also lead to the child having attachment difficulties. The extent of the damage to the child's health, development or welfare is influenced by a range of factors. These factors include the extent, if any, of positive influence in the child's life as well as the age of the child and the frequency and consistency of neglect. Neglect is associated with poverty but not necessarily caused by it. It is strongly linked to parental substance misuse, domestic violence. A reasonable concern for the child's welfare would exist when neglect becomes typical of the relationship between the child and the parent or carer. This may become apparent where you see or hear about the child over a period of time, or the effects of neglect may be obvious based on having seen the child once. The following are features of child neglect:

- Children being left alone without adequate care and supervision
- Malnourishment, lacking food, unsuitable food or erratic feeding, failure to thrive,
- Failure to provide adequate care for the child's medical and developmental needs, including intellectual stimulation
- Inadequate living conditions – unhygienic conditions, environmental issues, including lack of adequate heating and furniture, poor ventilation, exposure to mould
- Lack of adequate clothing
- Inattention to basic hygiene, example headlice, dental, access to bathing
- Lack of protection and exposure to danger, including moral danger, or lack of supervision appropriate to the child's age
- Persistent failure to attend school
- Abandonment or desertion

Emotional Abuse

Emotional abuse is the systematic emotional or psychological ill-treatment of a child as part of the overall relationship between a caregiver and a child. Emotional abuse occurs when a child's basic need for attention, affection, approval, consistency and security is not met, due to incapacity or indifference from their parent or caregiver. Emotional abuse can also occur when adults responsible for taking care of children are unaware of and unable (for a range of reasons) to meet their children's emotional and developmental needs. Emotional abuse is not easy to recognise because the effects are not easily seen. A reasonable concern for the child's welfare would exist when the behaviour becomes typical of the relationship between the child and the parent or carer.

Emotional abuse may be seen in some of the following ways:

- Rejection
- Lack of comfort and love
- Lack of attachment
- Lack of proper stimulation (e.g. fun and play)
- Lack of continuity of care (e.g. absent parents/care givers, frequent moves, particularly unplanned)
- Continuous lack of praise and encouragement

- Persistent criticism, sarcasm, hostility or blaming of the child
- Bullying
- Conditional parenting in which care or affection of a child depends on his or her behaviours or actions
- Extreme overprotectiveness
- Inappropriate non-physical punishment (e.g. locking child in bedroom)
- Ongoing family conflicts and family violence
- Seriously inappropriate expectations of a child relative to his/her age and stage of development

There may be no physical signs of emotional abuse unless it occurs with another type of abuse. A child may show signs of emotional abuse through their actions or emotions in several ways. These include insecure attachment, unhappiness, low self-esteem, lethargy, poor attention and difficulties in school setting, developmental underachievement, risk taking and aggressive behaviour. It should be noted that no one indicator is conclusive evidence of emotional abuse. Emotional abuse is more likely to impact negatively on a child where it is persistent over time and where there is a lack of other protective factors.

Physical abuse

Physical abuse is when someone deliberately hurts a child physically or puts them at risk of being physically hurt. It may occur as a single incident or as a pattern of incidents. A reasonable concern exists where the child's health and/ or development is, may be, or has been damaged as a result of suspected physical abuse. Physical abuse can include the following:

- Physical punishment: beating, slapping, hitting or kicking, pushing, shaking or throwing, pinching, biting, choking or hair-pulling
- Use of excessive force in handling
- Deliberate poisoning
- Suffocation Fabricated/induced illness
- Female genital mutilation.

The Children First Act 2015 includes a provision that abolishes the common law defence of reasonable chastisement in court proceedings. This defence could previously be invoked by a parent or other person in authority who physically disciplined a child. The change in the legislation now means that in prosecutions relating to assault or physical cruelty, a person who administers such punishment to a child cannot rely on the defence of reasonable chastisement in the legal proceedings. The result of this is that the protections in law relating to assault now apply to a child in the same way as they do to an adult.

Sexual abuse

Sexual abuse occurs when a child is used by another person for their gratification or arousal, or for that of others. It includes the child being involved in sexual acts (masturbation, fondling,

oral or penetrative sex) or exposing the child to sexual activity directly or through pornography. Child sexual abuse may cover a wide spectrum of abusive activities. It rarely involves just a single incident and in some instances occurs over a number of years. Child sexual abuse most commonly happens within the family, including older siblings and extended family members. Cases of sexual abuse mainly come to light through disclosure by the child or his or her siblings/friends, from the suspicions of an adult, and/or by physical symptoms. *Examples of child sexual abuse include the following:*

- Any sexual act intentionally performed in the presence of a child
- An invitation to sexual touching or intentional touching or molesting of a child's body whether by a person or object for the purpose of sexual arousal or gratification
- Masturbation in the presence of a child or the involvement of a child in an act of masturbation
- Sexual intercourse with a child, whether oral, vaginal or anal
- Sexual exploitation of a child, which includes: » Inviting, inducing or coercing a child to engage in prostitution or the production of child pornography [for example, exhibition, modelling or posing for the purpose of sexual arousal, gratification or sexual act, including its recording (on film, videotape or other media) or the manipulation, for those purposes, of an image by computer or other means] » Inviting, coercing or inducing a child to participate in, or to observe, any sexual, indecent or obscene act » Showing sexually explicit material to children, which is often a feature of the 'grooming' process by perpetrators of abuse
- Exposing a child to inappropriate or abusive material through information and communication technology
- Consensual sexual activity involving an adult and an underage person

It should be remembered that sexual activity involving a young person may be sexual abuse even if the young person concerned does not themselves recognise it as abusive. An Garda Síochána will deal with any criminal aspects of a sexual abuse case under the relevant criminal justice legislation. The prosecution of a sexual offence against a child will be considered within the wider objective of child welfare and protection. The safety of the child is paramount and at no stage should a child's safety be compromised because of concern for the integrity of a criminal investigation. In relation to child sexual abuse, it should be noted that in criminal law the age of consent to sexual intercourse is 17 years for both boys and girls. Any sexual relationship where one or both parties are under the age of 17 is illegal. However, it may not necessarily be regarded as child sexual abuse. Details on exemptions for mandated reporting of certain cases of underage consensual sexual activity can be found in Chapter 3 of this Guidance.

Recognition and Reporting

This section offers guidance both on how to recognise child abuse and how to deal with it. It outlines the reporting procedures to be followed, by both staff members and volunteers, which have been put in place at MRCI in order to deal with disclosures of abuse. **A disclosure**

can be defined as information received either directly or indirectly that leads a staff member or volunteer to believe that a child may be at risk of neglect or abuse or is being neglected or abused.

MRCI agrees that the organisation should always inform Tusla when we have reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected. If you ignore what may be symptoms of abuse, it could result in ongoing harm to the child or the organisation could be liable for ignoring and not following due diligence. **It is not necessary for you to prove that abuse has occurred to report a concern to Tusla. All that is required is that you have reasonable grounds for concern. It is Tusla's role to assess concerns that are reported to it.**

Reasonable grounds for a child protection or welfare concern include:

- Evidence, for example an injury or behaviour, that is consistent with abuse and is unlikely to have been caused in any other way
- Any concern about possible sexual abuse
- Consistent signs that a child is suffering from emotional or physical neglect
- A child saying or indicating by other means that he or she has been abused
- Admission or indication by an adult or a child of an alleged abuse they committed
- An account from a person who saw the child being abused

Recognition

Recognising abuse is not always easy, even for professionals working in this field. The following is a list of indicators⁶ intended to act as guidance only and as such, is not exhaustive. It is important to stress that **no one indicator should be seen as conclusive in itself of abuse**; it may indeed indicate conditions other than child abuse. They may however act as reasonable grounds for concern.

- Disclosure of abuse and neglect by a child or a young person;
- Age-inappropriate or abnormal sexual play or knowledge;
- Specific injuries or patterns of injuries;
- Absconding from home or a care situation;
- Attempted suicide;
- Under-age pregnancy or sexually transmitted diseases;
- Signs in one or more categories at the same time. For example, signs of developmental delay, physical injury and behavioural signs may together indicate a pattern of abuse.

Procedure

This section offers information (i) on what a staff member, Fellowship awardee, student on placement or volunteer should do if it is suspected or disclosed that a child or young person

⁶ [Department of Children, Disability and Equality](https://www.gov.ie/en/department-of-children-equality-disability-integration-and-youth/publications/children-first-national-guidelines-for-the-protection-and-welfare-of-children-2017/) *Children First: National Guidance for the Protection and Welfare of Children 2017* Available at: <https://www.gov.ie/en/department-of-children-equality-disability-integration-and-youth/publications/children-first-national-guidelines-for-the-protection-and-welfare-of-children-2017/>

is being abused and (ii) the procedures to be followed by the Child Protection Officer, once the complaint has been made.

Reporting a Disclosure – Procedure for Staff, Fellowship awardee, intern, student on placement, volunteer

It is not the responsibility of a staff member or a volunteer to decide whether a child is being abused, but any legitimate concerns or suspicions should be acted upon. Below is a staff/volunteer step by step guide to dealing with disclosures. A disclosure may be defined as any information either directly or indirectly received, which leads you to believe that a child is being abused ⁷:

- ✓ Listen to the disclosure, remain calm and offer assurance that the disclosure will be looked into.
- ✓ Do not ask any leading questions or make any value judgments.
- ✓ Inform the complainant (this could be the young person themselves or somebody else) that you cannot guarantee confidentiality regarding the information disclosed. Do stress however that it was right to tell.
- ✓ Record all details of the complaint using the *Initial Incident Report Form* (see Appendix A) as soon as possible after the disclosure, containing as much detail as possible.
- ✓ Give a completed copy of this report to the DLP immediately.
- ✓ Follow any directions given by the Designated Liaison Person

Reporting a Complaint Procedure – the Child Protection Officer (CPO)

When a report of abuse is made by a staff member or volunteer, be it against another member of staff, a volunteer, or a person outside of the organisation, the following procedures are to be followed by the Designated Liaison Person:

- ✓ Meet with the staff member or volunteer who took the complaint.
- ✓ Discuss the concerns raised and how the case may be taken further.
- ✓ Where the complaint is made against an MRCI staff member, the CPO will meet with that person, explain the circumstances of the allegation and the overreaching duty of the organisation to child protection. The CPO will remind the staff member of the contractual clause covering the situation, and advise that *either*-
 - The staff person will continue working but will undertake not to be in a situation where they have contact with children pending clearance to do so from CPO *or*
 - The staff member will immediately be suspended from duty on full pay for a period specified by the CPO in the particular circumstances.
 - The staff member will be advised by the CPO of confidentiality and that the staff member has a right to separate representation at any stage of the investigative process

⁷ In this regard, staff members and volunteers should be aware that they are protected under Irish legislation by the Protection for Persons Reporting Child Abuse Act 1998.

- The staff member will be kept informed at every stage of the process and will have the right of reply.

Next steps in both scenarios:

1. If it is determined that a complaint requires further action then a report should be made via the [Tusla portal](#). The report must be stored in a secured and locked file: physical file with lock or a pin access file to DLPs/CPO only on our internal database. Normal retention periods apply.
2. [Duty social work](#) can be contacted for support when reporting.
3. A decision should be made by MRCI as to whether An Garda Síochána should be contacted also at time of report.
4. Keep all persons involved⁸ informed of the process and the outcome and of all meetings relating to the complaint as appropriate.
5. Ensure all records relating to the complaint are completed, filled out appropriately and filed in a secure location.

If, in speaking to the staff member or volunteer who made the complaint, it is determined that no further action is required, then all relevant parties to the complaint should be so informed as appropriate. It may be necessary to investigate the possibility that underlying factors exist that resulted in the complaint being made and if so, this should be followed up.

If, as a result of further action, it is determined that a serious breach of MRCI's child protection policy has occurred, which could amount to gross misconduct on the part of a staff member, a ground for fair dismissal will ordinarily be made out.

Recruitment of Staff and Volunteers

As part of the Child Protection Policy, MRCI will seek to thoroughly check the background and suitability of **all** relevant staff, and volunteers. The procedure will involve a number of checks and safeguards, and no provisional offer of employment will be confirmed, nor employment commenced until all checks have been satisfied.

Recruitment Process

- In the application form, applicants will be requested to give a detailed account of their employment history. This form must then be signed and dated by the applicant, confirming that all information given is true.
- Selected candidates will be interviewed by a panel in accordance with the usual recruitment procedures. Applicants will be asked to account for any gaps in their application forms and to give details of what they were doing if not in employment or

⁸ Confidentiality with regard to child protection issues is of utmost importance and should only be shared on a 'need to know' basis and in the best interest of the child concerned.

volunteering. Should a provisional offer of employment be made, references will be taken up, at least one of which should be the applicant's present or last employer.

- MRCI will avail of Garda vetting for staff members and volunteers who engage with children and young people, whether via our Information and Support Centre or campaign, community and outreach settings.
- All staff contracts will contain a clause setting out the procedure outlined above which will be adopted where the staff member is the subject of any allegation of abuse of a child, even where such allegation is subsequently declared unfounded.
- MRCI's comprehensive supervision framework (induction, probation, regular supervision, training, learning and development) has been updated to reflect organisations commitment to child protection and safeguarding.
- MRCI will avail of Garda vetting for staff members, whose work entails necessary and regular part of which consists mainly of the person having access to or contact with children

Safe Management and Supervision of Staff, Fellows, Students on Placement and Volunteers

No matter how good the recruitment and selection procedures can be, MRCI recognises that it is necessary to ensure that safe management and supervision of staff members, fellows, students on placement and volunteers also takes place. It is also necessary to provide opportunity to staff members and volunteers who may wish to raise concerns in relation to issues of child protection, if they should wish to do so. This opportunity will be afforded to staff members and volunteers. The Child Protection Officer (CPO) is available for staff members to privately approach with any concerns they may have.

Code of Conduct for Migrant Rights Centre Ireland's Staff Members, Fellows, Volunteers in relation to working with Children.

In order to avoid the possibility of misunderstanding and the potential for allegations of misconduct, the following ***Code of Conduct*** has been developed. By setting out appropriate and inappropriate behaviour, this code good practice in all of MRCI's work with children. It aims not only help to protect children, but also staff and volunteers.

Do	Listen and hear – give time to the child and what they may want to say.
Do	Always treat all children with respect – don't embarrass them.
Do	Respect a child's right to privacy and dignity.
Do	Remember that someone else might misinterpret your actions, no matter how well intentioned.

Do	As per statutory requirements, when working with children under 18, ensure more than one vetted/trained person from the organisation being present or at least in sight or hearing of others.
Do	Recognise that while physical contact is a valid way of comforting, reassuring and showing concern for children, it should only take place when it is acceptable to all persons. Physical touch should only happen if initiated by the child or vulnerable adult, or with verbal consent, cues or gestures should not be used as consent.
Do	Pick materials carefully to ensure their suitability for a youth audience, or that is sensitive to the work.
Do	Use age-appropriate language. Joking, sarcasm and sexualised language when around children and young people, are inappropriate when communicating in a professional context.
Do	In the unlikely event of needing to travel with children and young people ensure to carry identification.
Do Not	Give lifts in your car to individual young people unless this is unavoidable for safety reasons. If such a situation arises, ensure that another staff member or volunteer is aware and inform them of your expected arrival time.
Do Not	Bring a child to your home or give out personal information e.g. address, telephone number etc.
Do Not	Contact a child outside of the group or project you may be working on with them.
Do Not	Punish physically a child or be in any way verbally abusive, recognise one's power in all interactions with vulnerable people.
Do Not	Show favouritism to any individual.
Do Not	Allow bullying.
Do Not	Allow any physically rough or sexually provocative games, or inappropriate talking or touching, by any child for which you have responsibility.
Do Not	Under any circumstances attempt to deal with any problems which may arise in relation to child protection alone. Discuss all concerns with the DLP or the DDLP.