

# Policy and Procedure on Safer Caring, Privacy and Confidentiality

Cambian Dilston College

Policy Author / Reviewer	Policy and Performance Team
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## 1. Monitoring and Review

- 1.1. The Proprietor will undertake a formal review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than three years from the date of approval

shown above, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

- 1.2. The local content of this document will be subject to continuous monitoring, refinement and audit by the Head of Service.

Signed:



Marie Flatman  
Principal  
September 2025

## 2. Terminology

- 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

'Establishment' or 'Location'	This is a generic term which means the Children's Home/school/college. Cambian Dilston College is a college.
Individual	This means any child or young person under the age of 18 or young adult between the ages of 18 and 25. At Cambian Dilston College we have [young people/adults attending and/or residing primarily between the ages of 16 and 25, however this can be extended to meet individual needs.
Service Head / Head of Service	This is the senior person with overall responsibility for the college. At Cambian Dilston College this is the Principal who is <b>Marie Flatman</b> (for education), as well as the Registered Manager <b>Rick Johnson</b> (for residential).
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services. At Cambian Dilston College this is <b>Ofsted/DfE/CQC</b> .
Social Worker	This means the worker allocated to the child/family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.

## 3. Legislation

- 3.1. Cambian Group complies with legislation / regulations and requirements under the Quality Standards 2015 Social Care, England Children and Young Persons, England, The Children's Homes (England) Regulations

2015 and The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015, Care Home (Wales) Regulation 2002 (Miscellaneous Amendments) Regulations 2007. It also accords with General Data Protection Regulations (GDPR) and the Data Protection Act 2018. (NF)

## 4. Purpose

- 4.1. The purpose of this document is to guide staff on how to safely foster a therapeutic relationship with young people, in an appropriate and meaningful way. Staff will be enabled to deliver the duty of care owed to young people in Cambian services.

## 5. Policy

- 5.1. This policy applies to all staff working with young people.

## 6. Procedure

### Discussions regarding information on an Individual

- 6.1. Staff must respect the young people's right to confidentiality at all times.
- 6.2. Staff must not share any information relating to an Individual with any other Individual including sensitive health information (see health policy/HIV/AIDS policy).
- 6.3. Staff must be vigilant when making telephone calls. Staff must not give any information about an Individual out to anyone other than agreed professionals and parents if applicable. This must be discussed at the admission and staff must be aware then restrictions may be put in place with regards to information given

to parents due to concerns around the Individual's safety, e.g. if contact between parents is supervised or if the young person is on a full care order. Staff should discuss this with their manager if they are unsure.

- 6.4. When answering the telephone in the home, staff should not use the home's name but rather state "Good morning, Cambian Group".

### Privacy - General Guidance

- 6.5. By doing the following, staff can ensure that the right to privacy of the young people in their care, is ensured:
- Being familiar with young people's Care Plans or agreements, therefore minimising unnecessary intrusion or disruption if it could have been avoided.
  - Challenging other staff practice that compromises a young person's privacy.
  - Being familiar with related Cambian Point policies and procedures referred to in the policy.
  - Providing young people with information concerning their rights to privacy and to making complaints if they are dissatisfied.
  - Ensuring young people are aware of how we handle their personal information and what their rights are under the Data Protection Act (see the Privacy Policy). (NF)
  - Managers are responsible for ensuring Staff are properly informed of arrangements for the delivery of services to young people, and for updating Staff when these arrangements change.
  - Being fully aware of an Individual's personal care arrangements and routines.
  - Ensuring that confidential discussions are kept confidential - in keeping with relevant procedures in this guidance.
  - Using practices that do not unnecessarily draw attention to young people and which respect their dignity and privacy, especially practices relating to intimate and invasive care.
  - Managers are responsible for ensuring that accommodation and facilities are of a high standard and that there is an area for young people and users to receive family, visitors in private.
  - Young people's Homes have access to make and receive telephone calls in private, in accordance with individual care plans.
  - Young people should be offered sufficient time away from unnecessary Staff intrusion and or interruption - in accordance with individual care and risk management plans.

### Physical Contact

- 6.6. Please refer to **Policy 033 - Intimate and Invasive Care** for more detailed guidance.
- 6.7. Physical contact forms part of the person-centred care staff deliver to young people and should be offered in adherence to the young person's needs, as detailed in the care plans and risk assessment documents.
- 6.8. Appropriate touch is a natural and necessary part of personal development and may help young people to form and benefit from such relationships with adults.
- 6.9. However, the young people who are being educated and looked after by Cambian Group are owed a duty of care which precludes many forms of physical contact.
- 6.10. Staff should will work in a 'limited touch' environment. When physical contact is made with young people, this will be in response to the Individual's needs at the time, for a limited duration and will be appropriate given the age and stage of development of the Individual. For example, it would be acceptable to briefly hug, shake hands or pat on the back or arm to congratulate a young person.
- 6.11. Staff should seek clarification from their managers if unsure of what physical contact is appropriate and must always be aware of the updates to a young person's care plan and risk assessment documents.
- 6.12. When young people are distressed it is important that they are comforted and often physical contact can facilitate this. In these circumstances a touch on the arm, holding a hand or an arm around the shoulder

might be appropriate. However staff must remain self-aware at all times to ensure that their contact with young people is not threatening or intrusive and not subject to misinterpretation.

- 6.13. Staff who are involved in the education and care of young people who have been emotionally or sexually abused need to exercise particular caution in the use of physical contact. This should be detailed in the young person's care plans and risk assessment documentation. Staff should be aware of the risks of inappropriate physical contact for themselves and the young person.
- 6.14. There are some forms of physical contact, which are always inappropriate between staff and young people. Inappropriate forms of contact with young people include:
- Allowing a young person to sit on a staff member's lap.
  - Close physical contact over a sustained period of time, for example, a young person leaning on a staff member's shoulder or maintaining physical contact whilst sitting closely besides one another.
  - 'Play fighting': Staff should never engage in play fighting with young people and should actively discourage such behaviour between young people and themselves.
  - Inappropriate restraint: On occasions it may be necessary for staff to restrain young people in order to protect them or others or to protect property. In these circumstances the restraint must be conducted in line with agreed policy and procedure with the least amount of force applied for the minimum length of time required for the Individual to regain self-control. Under no circumstances whatsoever would it be permissible to strike an Individual, nor should a young people be handled roughly or held in ways that deliberately cause pain. Staff should never engage in 'play fighting' with young people and should actively

discourage such behaviour between young people themselves. Please refer to 045 Behaviour Support for further guidance.

- Kissing.

6.15. It is not intended that this code should distance staff from the young people they teach or look after, rather it is an acknowledgement that such limits on physical contact are an inevitable consequence of the current climate of concern about young people's safety.

6.16. In addition to individual care plans, the following guidance should be taken into consideration:

- When thinking about who is an appropriate person to touch an Individual, it is vital to consider what the adult represents to the particular Individual. Personal likes and dislikes will play a part in any relationship.
- In addition, many factors influence the power relationship between adult and Individual, including gender, race, disability, age, sexual identity and role status.
- The background of the Individual will also influence any decision about who represents a 'safe' adult in the eyes of the Individual.
- Young people from ethnic minority backgrounds may be used to different types of touch as part of the culture.
- Young people who have been subject to physical or sexual abuse may be suspicious or fearful of touch. This is not to say that young people who have experienced abuse should not be touched, it may be beneficial for the Individual to know different, safer and more reliable adults who will not use touch as a form of abuse.
- For each Individual, what constitutes an intimate part of the body will vary; but generally speaking it is acceptable to touch young people's hands, arms, shoulders. It may be appropriate to hug or cuddle young people, or carry or give them 'piggy backs'.
- Other parts of the body are less appropriate to be touched, by degrees. Some parts of the body are 'no go areas'.
- No part of the body should be touched if it were likely to generate sexualised feelings on the part of the adult or Individual.
- No body parts should be touched should be touched in a way which appeared patronizing or otherwise intrusive.
- The context in which touch takes place is usually a decisive factor in determining the emotional and physical safety for both parties.
- A fleeting or clumsy touch may confuse an Individual or make them feel uncomfortable or even cause distress. Staff/ should touch with confidence, and should verbalise their affection, reassurance and acceptance; by

touching and making positive comments. For example, by touching an Individual's arm and saying, "Well done".

- Where young people indicate that touch is unwelcome, staff should stop and immediately apologise.
- Staff should talk to colleagues and record their interactions with young people. If particular strategies work, or not, colleagues should be informed so they can build on or avoid making the same mistake.
- Touch of an equally positive and safe nature is acceptable between Staff; demonstrating positive role models for young people. Showing that adults can get along and use touch in non-abusive or threatening ways.
- It is also acceptable to talk about how touch feels, about acceptable boundaries and expectations, doing so in 'resident's meetings' or primary Carer Keyworker sessions.
- Play fighting is no alternative for this. It is unacceptable.
- The key is for Staff to help young people experience and benefit from touch, positively and safely, as a way of communicating affection, warmth, acceptance and reassurance.

### Support for staff

- 6.17. Staff may wish to use their six-weekly supervisions as an opportunity to discuss concerns any concerns about conduct between them and young person being inappropriate or being perceived as inappropriate. These supervisions will be a safe space for staff to reflect on their experiences.
- 6.18. Staff relationships with one another should be sufficiently open and non-judgemental to allow discussion and to provide opportunities for joint consideration of each other's actions.
- 6.19. Other people's feelings and views, both staff members and young people, need to be taken into account. If there is any indication that a relationship is viewed as inappropriate, the staff member involved should discuss the matter with other staff in order to understand their concerns and to explain their own perspectives. These discussions should take place openly and without judgement.
- 6.20. If they feel in any doubt about their own or other people's feelings, Staff should step back, reflect their actions doing and discuss the issues with their manager.

### Interaction on a One to One Basis

- 6.21. All young people should be given individualised support in line with their needs, Identified in their care plans. Staff must have knowledge and understanding of the Individual and his or her background, and be able to recognise and respect any emotional barriers for the Individual.
- 6.22. Staff need to be aware of their own feelings. They may believe they are the best person to care for, Key work, or support a particular Individual in a confidential, one to one situation but they should discuss this with supervisors.
- 6.23. Staff should be sufficiently aware of their own feelings, and reflect the dangers of a relationship with an Individual becoming sexualised.
- 6.24. A lone working risk assessment checklist should also be completed in all homes to ensure staff are aware of the safe caring expectations for this.
- 6.25. All young people should have access to an Independent Visitor (Advocate, Young people's Right Officer, Adult Family Member or Mentor). Please refer to POLICY - [Advocacy](#).
- 6.26. There are clear boundaries that Staff should not break when working with young people and young people. Staff must ensure that young people do not have access to their personal addresses, and private phone

numbers. Staff should never use social media platforms to connect with young people. If this information is gained by the Individual then their Line Manager should be informed.

- 6.27. There should be no arrangements made between Staff and young people to meet socially any meeting that may take place by chance or in unexpected circumstances should be reported immediately to the Home Manager.

### Young people's background and plans

- 6.28. The Individual may have had particular experiences which make it difficult to accept touch from an adult; or the Individual's experiences may lead to a need for more touch than is acceptable. It is therefore important for Staff to obtain information about the Individual's background before acting, in any way not just in terms of the use of touch. If there are particular needs that the Individual has or if it appears that the Individual may respond more or less favourably to touch, this must be reflected in the care planning process. Dependent on the age and level of understanding of the Individual, s/he should be involved in this assessment and planning; and should be encouraged to consent to being touched; or to place conditions on it.
- 6.29. Where it is known that an Individual has been a victim of sexual abuse and it is likely he or she will behave towards Staffers in a sexual manner, particular guidance will be issued to staff, which will be detailed in the young person's care plan. This may involve the need to avoid being alone with the Individual, by always having a third person present.
- 6.30. Young people who have suffered many unexpected losses in adult relationships are likely to be constantly fearful of being abandoned again. Due to the current rota systems and shift patterns which some young

people may find bewildering, staff can help by explaining their own movements and make sure the young people know who will be with them and who will be available for support or advice.

### Access to Bedrooms

- 6.31. Staff should seek permission and must knock before entering a young person's room.
- 6.32. Staff must take extra consideration when dealing with young people of the opposite sex. Staff can enter bedrooms when required but must do so in a safe and respectable way i.e. advise the Individual very clearly that you will be entering the bedroom and give them adequate time to be able to respond to this warning.
- 6.33. Staff must not at any time let the bedroom door shut behind them as this could leave the Individual feeling uncomfortable and also protects the staff member.
- 6.34. There are certain circumstances whereby staff have a duty of care to enter a young person's room, even if permission has not been granted. These are:
- When young people are considered at risk due to their behaviours i.e. could lead to serious harm to the Individual, to another Individual or could have major health & safety implications in the home.
  - When there is evidence to suggest that another Individual is in their bedroom without consent from the home.
- 6.35. If rooms are entered in an emergency for the above reasons then staff should try to gain access by whatever means necessary and constantly verbalise their actions to the Individual. At this point staff should consider the involvement of emergency services should the situation warrant, please read policy 024 – Police Liaison.
- 6.36. Staff should be prepared to give emergency first aid should an Individual have harmed themselves.
- 6.37. In the interest of Health and Safety and safe caring it is important to ensure that young people's bedrooms are cleaned regularly.
- 6.38. If young people present problems around cleanliness a risk management plan must be put in place to help young people clean their rooms. This should be agreed with parents and placing social worker.
- 6.39. If an Individual refuses assistance and will not clean their room then staff must identify this and agree times and dates to complete it for them. All information and conversations around this must be clearly evidenced in an Individual journal.
- 6.40. Young people placed on an emergency basis may not share bedrooms.
- 6.41. Young people may not receive visitors in their bedrooms unless has been agreed by the social worker, the young people's views and wishes have been obtained, considered and the arrangements are outlined in the relevant Placement Plan.

### Room Searches

- 6.42. Please see [Search Policy](#).

### Access to/use of telephone

- 6.43. Please refer to [POLICY - Individuals Access to Telephones, mobile and IT](#)

### Access to Case Records/Information on an Individual

- 6.44. Please refer to [POLICY - Access to Records](#)

### Showering/Bathing/Getting Dressed

- 6.45. Staff must respect young people have the right to absolute privacy whilst showering, bathing & getting dressed.
- 6.46. Staff must not enter a bedroom, bathroom or shower facility unless there is evidence to indicate that an Individual would be at serious risk of harm if the staff did not enter at that point.
- 6.47. Only staff should be able to open the doors to bathrooms, showers and toilets from the outside in case of emergency.
- 6.48. If an Individual requires support whilst showering, bathing or getting dressed, i.e. in the case of example an injury or a medical condition, this must be clearly identified within the young person's placement plan and risk management plans. This must be done in consultation with placing social workers, parents (if applicable) and any significant others.
- 6.49. Any staff involved with intimate care or with lifting and handling must have received appropriate training and must be provided with clear and appropriate guidelines on the provision of such assistance.
- 6.50. The gender of the Individual must be taking into account when making any arrangements for assistance.
- 6.51. All bathrooms and bedrooms should have a fully functioning lock at all times.
- 6.52. All windows should be fitted with appropriate curtains, which shut fully to prevent people outside seeing in.
- 6.53. Staff must ensure that young people have access to the homes washing facilities. Should they wish to do so they can wash their clothes in privacy.
- 6.54. Staff must ensure that every Individual has a lockable cabinet within their bedroom with their own key to ensure they can store things they wish to. Staff must also hold a key to this (see section on room searches above)

### Feminine hygiene and care:

- 6.55. Sanitary products should be readily available at all times and staff should maintain the privacy and dignity of young females in their care, at all times.

### Sexual health and relationships:

- 6.56. Young people should be educated on sexual health and relationship issues. Contraception should be discussed openly with young people and advice should be given on where to obtain such. If young residents are not comfortable speaking to staff then details of other agencies such as Brook Advisory Clinics or LAC Nurse should be offered.
- 6.57. Staff must be aware of an Individual's rights to privacy & confidentiality when discussing sexual health and relationships and young people should not be subjected to intrusive questions in this area.
- 6.58. Staff must take into account the culture and religion of the Individual when addressing any issues of an intimate or sexual health nature.

### Intimate Care/Bathing

- 6.59. Staff should refer to [Intimate and Invasive Care Policy](#).
- 6.60. If possible, young people should be supported and encouraged to undertake bathing, showers and other intimate care of themselves without relying on Staff. If young people are too young or are unable to bathe, use the toilet or undertake other hygiene routines, arrangements should be made for Staff to assist or

support them. Where services are provided to families/Parents, Staff should provide assistance or support as appropriate to enable Parents to bath or assist their young people with intimate care.

6.61. Such arrangements must be set out in the Care Plan, and must emphasise that young people's dignity and their right to be consulted and involved will be protected and promoted; and, where necessary, Staff will be provided with specialist training and support.

6.62. Unless otherwise agreed, young people will be given intimate care by adults of the same gender.

### Enuresis and Soiling

6.63. If it is known or suspected that an Individual is likely to experience enuresis, soiling or may be prone to smearing it should be discussed openly, with the Individual if possible, and strategies adopted for managing it; these strategies should be outlined in the Individual's Care Plan.

6.64. It may be appropriate to consult a Continence Nurse or other specialist, who may advise on the most appropriate strategy to adopt. In the absence of such advice, the following should be adopted:

- Find a private space to have an open conversation with the young person.
- Do not blame to the young person Individual or apply any form of sanction.
- Do not ask the young person to clear up;
- The young person should be helped to clean themselves if required and any soiled clothing or bedding should be removed and cleaned or disposed of as appropriate. Keep a record of this in the Health log.

6.65. Consider making arrangements for the Individual to have any supper in good time before retiring, and arranging for the Individual to use the toilet before going to bed; also consider arranging for the Individual to be woken to use the toilet during the night.

6.66. Consider using mattresses, protective toppers or bedding that can withstand being soiled or wetted.

### Photographs/Audio and Visual Equipment

6.67. Under no circumstances should images /video of young people be taken on personal mobile phones, personal cameras or any such equipment.

6.68. Photographs / video of young people should only be taken using the Location's camera and the Location's PC to download and print if digital pictures for use within the home. The placing authorities, and Ofsted, should be made aware of Cambian Groups' policy in relation to these matters.

6.69. Ofsted and the placing authorities should also be made aware if the home has CCTV in operation on its premises. Please refer to Policy GHS 09 – CCTV.

## 7. Accountability

7.1. All managers have day-to-day operational responsibility for this policy.

7.2. All colleagues are responsible for the success of this policy.

## 8. Standard Forms, Relevant Documents, Letters & References

### Other Cambian Policies

8.1. GIG 02 Data Protection

8.2. GIG 08 Access to Records

8.3. 051 Advocacy

- 8.4. GHS 04 Health & Safety Policy
- 8.5. GHR 11 Code of Conduct
- 8.6. 023 Missing from Care and Absence
- 8.7. 045 Behaviour Support
- 8.8. 029 Child Sexual Exploitation Policy
- 8.9. 058 HIV/AIDS Policy
- 8.10. 024 Police Liaison
- 8.11. 049 Search
- 8.12. 025 Safeguarding
- 8.13. 059 Health Policy
- 8.14. 033 Intimate and Invasive Care Policy