

## Safeguarding and Welfare Requirement: Child Protection

Providers must have and implement a policy, and procedures, to safeguard children.



## Safeguarding children, young people and vulnerable adults

### Policy statement

Carlton Playgroup Ltd will work with children, parents and the community to ensure the rights and safety of children, young people and vulnerable adults. Our Safeguarding Policy is based on the three key commitments of the Pre-school Learning Alliance Safeguarding Children Policy.

### Procedures

We are committed to building a 'culture of safety' in which children, young people and vulnerable adults are protected from abuse and harm in all areas of our service delivery.

Carlton Playgroup Ltd's designated safeguarding officer is Dannika Ineson

- When the setting is open but the designated officer is not on site, a suitably trained deputy is available at all times for staff to discuss safeguarding concerns. This is

Joanne Hallam or Sam Brooks

- 
- The designated officer ensures they have relevant links with statutory and voluntary organisations with regard to safeguarding.
  - The designated officer understands LSCB safeguarding procedures, attends relevant LSCB training at least every two years and refreshes their knowledge of safeguarding at least annually.
  - We ensure all staff are trained to understand our safeguarding policies and procedures and that parents are made aware of them too.
  - All staff have an up-to-date knowledge of safeguarding issues, are alert to potential indicators and signs of abuse and neglect and understand their professional duty to ensure safeguarding and child protection concerns are reported to the North Yorkshire children's social care team or the NSPCC. They receive updates on safeguarding at least annually.
  - All staff are confident to ask questions in relation to any safeguarding concerns and know not to just take things at face value but can be respectfully sceptical.
  - All staff understand the principles of early help (as defined in *Working Together to Safeguard Children*, 2015) and are able to identify those children and families who may be in need of early help and enable them to access it.

- All staff understand LSCB thresholds of significant harm and understand how to access services for families, including for those families who are below the threshold for significant harm.
- All staff understand their responsibilities under the General Data Protection Regulations and the circumstances under which they may share information about you and your child with other agencies.
- All staff understand how to escalate their concerns in the event that they feel either the local authority and/or their own organisation has not acted adequately to safeguard.
- All staff understand what the organisation expects of them in terms of their required behaviour and conduct, and follow our policies and procedures on positive behaviour, online safety (including use of mobile phones), whistleblowing and dignity at work.
- Children have a key person to build a relationship with, and are supported to articulate any worries, concerns or complaints that they may have in an age appropriate way.
- All staff understand our policy on promoting positive behaviour and follow it in relation to children showing aggression towards other children.
- Adequate and appropriate staffing resources are provided to meet the needs of children.
- Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.
- Enhanced criminal records and barred lists checks and other suitability checks are carried out for staff and volunteers prior to their post being confirmed, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.
- Where applications are rejected based on information disclosed, applicants have the right to know and to challenge incorrect information.
- Enhanced criminal records and barred lists checks are carried out on anyone living or working on the premises.
- Volunteers must:
  - be aged 17 or over;
  - be considered competent and responsible;
  - receive a robust induction and regular supervisory meetings;
  - be familiar with all the settings policies and procedures;
  - be fully checked for suitability if they are to have unsupervised access to the children at any time.
- Information is recorded about staff qualifications, and the identity checks and vetting processes that have been completed including:
  - the criminal records disclosure reference number;
  - certificate of good conduct or equivalent where a UK DBS check is not appropriate;
  - the date the disclosure was obtained; and
  - details of who obtained it.
- All staff and volunteers are informed that they are expected to disclose any convictions, cautions, court orders or reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment with us).
- All staff and volunteers are required to notify us if anyone in their household (including family members, lodgers, partners etc.) has any relevant convictions, cautions, court orders, reprimands or warnings or has

been barred from, or had registration refused or cancelled in relation to any childcare provision or have had orders made in relation to care of their children.

- We notify the Disclosure and Barring Service of any person who is dismissed from our employment, or resigns in circumstances that would otherwise have led to dismissal for reasons of a child protection concern.
- Procedures are in place to record the details of visitors to the setting.
- Security steps are taken to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the children.
- Steps are taken to ensure children are not photographed or filmed on video for any other purpose than to record their development or their participation in events organised by us. Parents sign a consent form and have access to records holding visual images of their child.
- Any personal information is held securely and in line with data protection requirements and guidance from the ICO.
- The designated officer in the setting has responsibility for ensuring that there is an adequate online safety policy in place.
- We keep a written record of all complaints and concerns including details of how they were responded to.
- We ensure that robust risk assessments are completed, that they are seen and signed by all relevant staff and that they are regularly reviewed and updated, in line with our health and safety policy.
- Staff members will inform the designated officer at the first opportunity of every significant safeguarding concern, however this should not delay any referrals being made to children's social care, the LADO, Ofsted or **RIDDOR**.

Carlton Playgroup Ltd is committed to responding promptly and appropriately to all incidents, allegations or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you're worried a child is being abused' (HMG, 2015) and the Care Act 2014.

#### *Responding to suspicions of abuse*

- We acknowledge that abuse of children can take different forms - physical, emotional, and sexual, as well as neglect.
- We ensure that all staff have an understanding of the additional vulnerabilities that arise from special educational needs and/or disabilities, plus inequalities of race, gender, language, religion, sexual orientation or culture, and that these receive full consideration in relation to child, young person or vulnerable adult protection.
- When children are suffering from physical, sexual or emotional abuse, or experiencing neglect, this may be demonstrated through:
  - significant changes in their behaviour;
  - deterioration in their general well-being;
  - their comments which may give cause for concern, or the things they say (direct or indirect disclosure);
  - changes in their appearance, their behaviour, or their play;
  - unexplained bruising, marks or signs of possible abuse or neglect; and

- any reason to suspect neglect or abuse outside the setting.
- We are aware of the 'hidden harm' agenda concerning parents with drug and alcohol problems and consider other factors affecting parental capacity and risk, such as social exclusion, domestic violence, radicalisation, mental or physical illness and parent's learning disability.
- We are aware that children's vulnerability is potentially increased when they are privately fostered and when we know that a child is being cared for under a private fostering arrangement, we inform our local authority children's social care team.
- We are prepared to take action if we have concerns about the welfare of a child who fails to arrive at a session when expected. A member of management will take immediate action to contact the child's parent to seek an explanation for the child's absence and be assured that the child is safe and well. If no contact is made with the child's parents and the designated officer has reason to believe that the child is at risk of significant harm, the relevant professionals are contacted immediately and LSCB procedures are followed. If the child has current involvement with social care the social worker is notified on the day of the unexplained absence.
- We are aware of other factors that affect children's vulnerability that may affect, or may have affected, children and young people using our provision, such as abuse of children who have special educational needs and/or disabilities; fabricated or induced illness; child abuse linked to beliefs in spirit possession; sexual exploitation of children, including through internet abuse; Female Genital Mutilation and radicalisation or extremism.
- In relation to radicalisation and extremism, we follow the Prevent Duty guidance for England and Wales published by the Home Office and LSCB procedures on responding to radicalisation.
- The designated officer completes online Channel training, online Prevent training and attends local WRAP training where available to ensure they are familiar with the local protocol and procedures for responding to concerns about radicalisation.

### *Prevent Duty*

When operating this policy we use the following accepted Governmental definition of extremism which is:

***'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.***

- There is no place for extremist views of any kind in our setting, whether from internal sources –children, staff or management, or external sources - school community, external agencies or individuals. The children see our setting as a safe place where they can ask questions about the world and where our staff encourage and facilitate these opportunities.
- As a setting we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our children.
- We aim to provide a broad and balanced early years curriculum, delivered by skilled professionals, so that our children understand and become tolerant of difference and diversity and also to ensure that they thrive and feel valued and respected as individuals.
- Children can be exposed to extremist influences or prejudiced views from an early age which originate from a variety of sources and media, including via the internet. There may be times when children may

reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

- Any prejudice, discrimination or extremist views, including derogatory language, displayed by children or staff will always be challenged and where appropriate supported through discussion with children and their families and the Code of Conduct for staff.
- Where misconduct by a member of staff is proven the matter will be referred to the Local Authority.

As part of wider safeguarding responsibilities setting staff will be alert to:

- Disclosures by children of their exposure to the extremist actions, views or materials of others outside of the setting, such as in their homes or community groups.
  - Graffiti symbols, writing or art work promoting extremist messages or images
  - Children exposed to extremist material online, including through social networking sites
  - Parental reports of changes in behaviour, friendship or actions and requests for assistance
  - Local authority services, and police reports of issues affecting children in other schools or settings
  - Use of extremist or 'hate' terms to exclude others or incite violence
  - Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
  - Our setting will closely follow any locally agreed procedure as set out by the Local Authority and /or the Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.
- We are aware of the mandatory duty that applies to teachers, including early years practitioners, and health workers to report cases of Female Genital Mutilation to the police.

### **Female Genital Mutilation procedure**

#### **Signs and Indicators:**

#### **Some indications that FGM may have taken place include:**

- The family comes from a community that is known to practice FGM, especially if there are elderly women present in the extended family
- A girl / young woman may spend time out of the classroom or from other activities, with bladder or menstrual problems
- A long absence from the setting or in the school holidays could be an indication that a girl has recently undergone an FGM procedure, particularly if there are behavioural changes on her return
- A girl may ask for help, either directly or indirectly
- A girl who is suffering emotional / psychological effects of undergoing FGM, for example withdrawal or depression

#### **Some indications that FGM may be about to take place include:**

- A conversation with a girl where they may refer to FGM, either in relation to themselves or another female family member or friend;
- A girl requesting help to prevent it happening;
- A girl expressing anxiety about a 'special procedure' or a 'special occasion' which may include discussion of a holiday to their country of origin;
- A boy may also indicate some concern about his sister or other female relative.

#### **Actions All staff should:**

- talk about FGM in a professional and sensitive manner, recognise and respect the child's wishes where possible, but child welfare must be paramount. FGM is child abuse and against the law. If a member of staff believes that the girl is at risk of FGM, or has already undergone FGM, the correct safeguarding procedures should be followed).
- Liaise with the DSO with responsibility for safeguarding children

**Staff should not:**

- treat such allegations merely as a domestic issue
- ignore what the child has told them or dismiss out of hand the need for immediate protection
- decide that it is not their responsibility to follow up the allegation
- approach the student's family or those with influence within the community, in advance of any enquiries by the police, adult or children's social care, either by telephone or letter.

**Action to take if staff believes a child is at risk of FGM:**

- Report any concerns immediately to DSO without **delay**

**The Designated Safeguarding Officer will:**

- Follow procedures in line with the Safeguarding Policy
- If a member of staff suspects that a student has been removed from, or prevented from, attending the setting as a result of FGM, the local authority will be notified along with social care and the police.

**Lock Down Procedure**

If an emergency happens the setting manager must act quickly to assess the likelihood of immediate danger. In most cases the assumption should be that it is safer to stay put and place the setting into 'lockdown' until the emergency services arrive.

As soon as the emergency services arrive it is essential staff comply with instructions at all times.

Upon alert the manager/ Deputy will blow the whistle. Upon hearing the whistle staff members are to line the children up either at the room door or the back door if the children are outside.

The Person in charge that day will collect the register, Telephone and emergency contact details.

The children and staff are then to go up stairs to the preschool room, making sure that the door and blind is closed. Awaiting further instruction from the authorities.

**Upon alert to lockdown**

Stay calm.

Ensure staff and children follow the procedure.

Close curtains and blinds where possible.

Stay away from windows and doors.

Stay low and keep calm, the procedure will be rehearsed with children in an age appropriate way. Lock-down must be rehearsed and recorded termly.

Tune into a local TV or radio station for more information.

Do NOT make non-essential calls on mobile phones or landlines.

If the fire alarm is activated, remain where you are and await further instructions from emergency services unless the fire is in your area. In which case, move to the next room/area, following the usual fire procedures.

## **Be alert**

Do NOT open the door once it has been secured until you are officially advised 'all clear' or are certain it is emergency services at the door.

Do NOT travel down long corridors.

Do NOT assemble in large open areas.

Do NOT call 999 again unless you have immediate concern for your safety, the safety of others, or feel you have critical information.

## **Following the lockdown**

Co-operate with the emergency services to help in an orderly evacuation.

Ensure you have the Register and children's details with you.

Any staff or children who have witnessed an attack or incident will need to tell the police what they saw.

The police may require other individuals to remain available for questioning.

## **Managing parents**

In the event of an incident it is inevitable parents will want to come to the setting and collect their children immediately.

They must be discouraged from doing so, until the emergency services give the all clear.

Even then, depending on the severity and type of incident, children may need to be checked by medical teams or questioned by the police.

It must be made absolutely clear to parents that you will be acting on the advice of the emergency services at all times.

Parents will be informed of the lock down via message and email.

## **Threat levels**

Threat levels are designed to give a broad indication of the likelihood of a terrorist attack.

**LOW** means an attack is unlikely.

**MODERATE** means an attack is possible but not likely.

**SUBSTANTIAL** means an attack is a strong possibility.

**SEVERE** means an attack is highly likely.

**CRITICAL** means an attack is expected imminently

- We also make ourselves aware that some children and young people are affected by gang activity, by complex, multiple or organised abuse, through forced marriage or honour based violence or may be victims of child trafficking. While this may be less likely to affect young children in our care, we may

become aware of any of these factors affecting older children and young people who we may come into contact with.

- Where we believe that a child in our care or that is known to us may be affected by any of these factors we follow the procedures below for reporting child protection concerns and follow the LSCB procedures.
- Where such evidence is apparent, the child's key person makes a dated record of the details of the concern and discusses what to do with the designated officer. The information is stored on the child's personal file.
- In the event that a staff member or volunteer is unhappy with the decision made of the designated officer in relation to whether to make a safeguarding referral they must follow escalation procedures.
- We refer concerns to the local authority children's social care team and co-operate fully in any subsequent investigation. NB In some cases this may mean the police or another agency identified by the Local Safeguarding Children Board.
- We take care not to influence the outcome either through the way we speak to children or by asking questions of children.
- We take account of the need to protect young people aged 16-19 as defined by the Children Act 1989. This may include students or school children on work placement, young employees or young parents. Where abuse is suspected we follow the procedure for reporting any other child protection concerns. The views of the young person will always be taken into account, but the setting may override the young person's refusal to consent to share information if it feels that it is necessary to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult. Sharing confidential information without consent is done only where not sharing it could be worse than the outcome of having shared it.
- All staff are also aware that adults can also be vulnerable and know how to refer adults who are in need of community care services.
- We have a whistleblowing policy in place.
- Staff/volunteers know they can contact the organisation Public Concern at Work for advice relating to whistleblowing; if they feel that the organisation has not acted adequately in relation to safeguarding they can contact the NSPCC whistleblowing helpline.

#### *Recording suspicions of abuse and disclosures*

- Where a child makes comments to a member of staff that give cause for concern (disclosure), or a member of staff observes signs or signals that give cause for concern, such as significant changes in behaviour; deterioration in general well-being; unexplained bruising, marks or signs of possible abuse or neglect; that member of staff:
  - listens to the child, offers reassurance and gives assurance that she or he will take action;
  - does not question the child, although it is OK to ask questions for the purposes of clarification;
  - makes a written record that forms an objective record of the observation or disclosure that includes: the date and time of the observation or the disclosure; the exact words spoken by the child as far as possible; the name of the person to whom the concern was reported, with the date and time; and the names of any other person present at the time.



- These records are signed and dated and kept in the child's personal file, which is kept securely and confidentially.
- The designated officer is informed of the issue at the earliest opportunity, and within one working day.
- Where the Local Safeguarding Children Board stipulates the process for recording and sharing concerns, we include those procedures alongside this procedure and follow the steps set down by the Local Safeguarding Children Board.

#### *Escalation process*

- If we feel that a referral made has not been dealt with properly or that concerns are not being addressed or responded to, we will follow the LSCB escalation process.
- We will ensure that staff are aware of how to escalate concerns.

#### *Informing parents*

- Parents are normally the first point of contact. Concerns are discussed with parents to gain their view of events, unless it is felt that this may put the child at risk, or interfere with the course of a police investigation. Advice will be sought from social care if necessary.
- Parents are informed when we make a record of concerns in their child's file and that we also make a note of any discussion we have with them regarding a concern.
- If a suspicion of abuse warrants referral to social care, parents are informed at the same time that the referral will be made, except where the guidance of the Local Safeguarding Children Board does not allow this, for example, where it is believed that the child may be placed at risk.
- This will usually be the case where the parent is the likely abuser.
- If there is a possibility that advising a parent beforehand may place a child at greater risk (or interfere with a police response) the designated person should seek advice from children's social care, about whether or not to advise parents beforehand, and should record and follow the advice given.

#### *Liaison with other agencies*

- We work within the North Yorkshire Safeguarding Children Board guidelines.
- The current version of 'What to do if you're worried a child is being abused' is available for parents and staff and all staff are familiar with what they need to do if they have concerns.
- We have procedures for contacting the local authority regarding child protection issues, including maintaining a list of names, addresses and telephone numbers of social workers, to ensure that it is easy, in any emergency, for the setting and children's social care to work well together.
- We notify Ofsted of any incident or accident and any changes in our arrangements which may affect the well-being of children or where an allegation of abuse is made against a member of staff (whether the allegations relate to harm or abuse committed on our premises or elsewhere). Notifications to Ofsted are made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.
- Contact details for the local National Society for the Prevention of Cruelty to Children (NSPCC) are also kept.

### *Allegations against staff*

- We ensure that all parents know how to complain about the behaviour or actions of staff or volunteers within the setting, or anyone living or working on the premises occupied by the setting, which may include an allegation of abuse.
- We respond to any inappropriate behaviour displayed by members of staff, volunteer or any other person living or working on the premises, which includes:
  - inappropriate sexual comments;
  - excessive one-to-one attention beyond the requirements of their usual role and responsibilities, or inappropriate sharing of images.
- We follow the guidance of the Local Safeguarding Children Board when responding to any complaint that a member of staff or volunteer within the setting, or anyone living or working on the premises occupied by the setting, has abused a child.
- We ensure that all staff and volunteers know how to raise concerns about a member of staff or volunteer within the setting. We respond to any concerns raised by staff and volunteers who know how to escalate their concerns if they are not satisfied with the response
- We respond to any disclosure by children or staff that abuse by a member of staff or volunteer within the setting, or anyone living or working on the premises occupied by the setting, may have taken, or is taking place, by first recording the details of any such alleged incident.
- We refer any such complaint immediately to the Local Authority Designated Officer (LADO) to investigate and/or offer advice:

*Rosemary Cannell 01609534974 or Susan Crawford 01609532152 (name and phone number)*
- We also report any such alleged incident to Ofsted (unless advised by LADO that this is unnecessary due to the incident not meeting the threshold), as well as what measures we have taken. We are aware that it is an offence not to do this.
- We co-operate entirely with any investigation carried out by children's social care in conjunction with the police.
- Where the management team and children's social care agree it is appropriate in the circumstances, the member of staff or volunteer will be suspended for the duration of the investigation. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff, as well as children and families, throughout the process.

### *Disciplinary action*

Where a member of staff or volunteer has been dismissed due to engaging in activities that caused concern for the safeguarding of children or vulnerable adults, we will notify the Disclosure and Barring Service of relevant information, so that individuals who pose a threat to children and vulnerable groups can be identified and barred from working with these groups.

We are committed to promoting awareness of child abuse issues throughout our training and learning programmes for adults. We are also committed to empowering children through our early childhood curriculum, promoting their right to be strong, resilient and listened to.

### *Training*

- Training opportunities are sought for all adults involved in the setting to ensure that they are able to recognise the signs and signals of possible physical abuse, emotional abuse, sexual abuse (including child sexual exploitation) and neglect and that they are aware of the local authority guidelines for making referrals.
- The Designated officer receive appropriate training, as recommended by the Local Safeguarding Children Board, every two years and refresh their knowledge and skills at least annually.
- We ensure that all staff know the procedures for reporting and recording any concerns they may have about the provision.
- We ensure that all staff receive updates on safeguarding via, online training and/or discussion at staff meetings at least once a year.

### *Planning*

- The layout of the rooms allows for constant supervision. No child is left alone with staff or volunteers in a one-to-one situation without being within sight and/or hearing of other staff or volunteers.

### *Curriculum*

- We introduce key elements of keeping children safe into our programme to promote the personal, social and emotional development of all children, so that they may grow to be strong, resilient and listened to and so that they develop an understanding of why and how to keep safe.
- We create within the setting a culture of value and respect for individuals, having positive regard for children's heritage arising from their colour, ethnicity, languages spoken at home, cultural and social background.
- We ensure that this is carried out in a way that is developmentally appropriate for the children.

### *Confidentiality*

- All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local Safeguarding Children Board.

### *Support to families*

- We believe in building trusting and supportive relationships with families, staff and volunteers.
- We make clear to parents our role and responsibilities in relation to child protection, such as for the reporting of concerns, information sharing, monitoring of the child, and liaising at all times with the local children's social care team.
- We will continue to welcome the child and the family whilst investigations are being made in relation to any alleged abuse.
- We follow the Child Protection Plan as set by the child's social worker in relation to the setting's designated role and tasks in supporting that child and their family, subsequent to any investigation.

- Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child in accordance with the Confidentiality and Client Access to Records procedure, and only if appropriate under the guidance of the Local Safeguarding Children Board.

## Legal framework

### *Primary legislation*

- Children Act (1989 s47)
- Protection of Children Act (1999)
- The Children Act (2004 s11)
- Safeguarding Vulnerable Groups Act (2006)
- Childcare Act (2006)

### *Secondary legislation*

- Sexual Offences Act (2003)
- Criminal Justice and Court Services Act (2000)
- Equality Act (2010)
- **General Data Protection Regulations (GDPR) (2018)**
- Childcare (Disqualification) Regulations (2009)
- Children and Families Act (2014)
- Care Act (2014)
- Serious Crime Act (2015)
- Counter-Terrorism and Security Act (2015)

## Further guidance

- Working Together to Safeguard Children (HMG, 2015)
- What to do if you're Worried a Child is Being Abused (HMG, 2015)
- Framework for the Assessment of Children in Need and their Families (DoH 2000)
- The Common Assessment Framework for Children and Young People: A Guide for Practitioners (CWDC 2010)
- Statutory guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004 (HMG 2008)
- Hidden Harm – Responding to the Needs of Children of Problem Drug Users (ACMD, 2003)
- Information Sharing: Guidance for Practitioners providing Safeguarding Services (DfE 2015)
- Disclosure and Barring Service: [www.gov.uk/disclosure-barring-service-check](http://www.gov.uk/disclosure-barring-service-check)
- Revised Prevent Duty Guidance for England and Wales (HMG, 2015)
- Inspecting Safeguarding in Early Years, Education and Skills Settings, (Ofsted, 2016)

This policy was adopted by

Carlton Playgroup Ltd

*(name of provider)*

On

*(date)*

Date to be reviewed \_\_\_\_\_ (date)  
Signed on behalf of the provider \_\_\_\_\_  
Name of signatory \_\_\_\_\_  
Role of signatory (e.g. chair, director or owner) \_\_\_\_\_

**Other useful Pre-school Learning Alliance publications**

- Safeguarding Children (2013)
- Safeguarding through Effective Supervision (2013)
- The New Early Years Employee Handbook (2016)
- People Management in the Early Years (2016)

\*A 'young person' is defined as 16 to 19 years old – in the setting they may be a student, worker, volunteer or parent.