

St Andrew's Church Hertford
Code of Safer Working Practice with Children, Young People and Vulnerable Adults
(please also refer to our Safeguarding Policy for children and vulnerable adults)

This guidance applies to all churches' activities with children or adults who may be vulnerable – for instance, Junior Church, crèche, holiday clubs, youth groups, during worship on Sunday mornings, on outings, in groups and when visiting at home. It is designed to protect children and adults who may be vulnerable, as well as our leaders.

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Respect and Choice (adults and young people)

- Ask about personal preferences, forms of address, how much help might be needed.
- Ensure his or her individuality - e.g. always use their name.
- Give the same respect as to others.
- Respect differences – e.g. in appearance, ideas, personalities, ability.
- Do not assume or withhold physical contact – ask first.
- Have a proper conversation using appropriate language – e.g. ask about interests.
- Recognise the choices adults who may be vulnerable make, even if they may appear risky.
- Give adults who may be vulnerable the highest level of privacy and confidentiality possible in their circumstances.
- Consult with the vulnerable adult about who s/he wishes to be included in decisions affecting his or her life.
- Offer assistance in such a way as to maximise a person's independence.
- Give adults who may be vulnerable a choice about where they sit, and what activities they participate in.
- Ensure that there is clear access to all areas which are available to members of the congregation - e.g. where coffee is served, where meetings are held.

Language and visual resources

- Always use positive language when referring to disability, age and mental health.
- Consult with individual adults who may be vulnerable to identify their specific needs.
- Use proper sign language for deaf people and those with learning disabilities, as appropriate
- Install a loop system.
- Have available service books and sheets in large print.
- Use suitable font size and colours on all printed material.
- Ensure that everyone has access to presentations etc., by offering a clear 'sight line'.
- Make information on notice boards accessible – take into account height, words, images and size.

Leadership of Activities

- Recruit all regular leaders of activities with children and adults who may be vulnerable according to the Diocesan Safe Recruitment Procedures including taking up references and obtaining the appropriate Disclosure and Barring Service disclosure.
- Ensure all leaders are aware of the health and safety issues relating to the activity, including procedures for fire and first aid.
- Give regular leaders a copy of the relevant sections of the parish safeguarding policy and procedures, and offer them support and training in their role.

Running of activities (Children and Young People)

The following examples of good practice are to be observed when planning and running activities with vulnerable persons:

- Always have at least two leaders and right gender mix, no matter how small the group.
- Try to ensure the leaders' genders reflect the group, i.e. endeavour to have at least one male leader if there are boys present, and at least one female leader if there are girls present.
- Ensure at least two leaders (preferably unrelated) are present from before the first child arrives until after the last child leaves.
- Ensure no person under the age of 18 years should be left in charge of a group of children of any age.
- Ensure young people under the age of 18, helping with groups, are supervised by an adult leader who is responsible for ensuring that good practice and the safeguarding children procedures are followed.

- Maintain the minimum required staffing levels for children's groups. More staff may be required if children are being taken out or undertaking physical activities.
- Plan activities, where practicable, to involve more than one leader/helper being present or at least within sight or hearing.
- Know the number of people present at all times. Keep an attendance list: this is essential in the event of evacuation being necessary.
- The meeting place itself should be secure and not subject to intruders entering without warning. Be aware this can impede evacuation if not thought through.
- Check toilets and store cupboards are not being used as hiding places.
- Accompany young children to the toilet. Children should have access to toilets without having to be in contact with other users of the premises.
- Ensure another adult is informed if a child needs to be taken to the toilet.
- Be aware of any other people who are authorised to use the premises at the same time.
- Ensure the activities are appropriate and safe for the age range.
- Enable children to be consulted in the programme planning if possible.
- Consider setting ground rules agreed by the group for participating in activities.
- Ensure films shown in a group activity are not be rated higher than the age of the youngest child in the group (e.g. 12 or 12A only to children of 12 or over).
- Check lighting and paths are safe.
- Know where the FIRST AID box is and aim to have a First Aider in attendance.
- Administer First Aid with others around.
- Know where the nearest telephone is (fixed line and/or mobile).
- Have an evacuation procedure for use in event of a fire.
- Inside doors should be left open to aid observation where possible.
- Be careful what you say and do – even well intentioned words and actions can be misinterpreted.
- Avoid unnecessary physical contact.
- Respond warmly to a child who needs comforting but make sure there are other adults around.
- Keep a written record of any incidents, injuries, fights, accidents etc.
- Parents or carers must be clearly informed of the place and time of meeting; and, if the meeting is off-site, when children will return. Ensure there is a definite drop-off and pick-up procedure that parents, carers and vulnerable people understand.
- Have parents and carers contact telephone numbers accessible at all meetings/events.
- In the event of a child not collected as arranged, the parent or carer should be contacted by phone and asked to collect the child. If contact with the parent is not possible, two leaders should wait with the child until contact with parent or carer has been established. Only in exceptional circumstances should the child be escorted home. If a child appears to have been abandoned, statutory services must be contacted.
- If a leader has concerns about the collection arrangements for a child over 11, they should address these directly with the parents or carers.
- Vulnerable persons should not be driven home without a parent/carers consent.
- When visiting a child's home NEVER go into the home if the parent or guardian is not there and keep a record of the visit noting date and purpose.

Staffing levels (for children and young people) as recommended by the NSPCC

0-2 yrs	1 person for every 3 children	1 : 3
2 – 4 yrs	1 person for every 4 children	1 : 4
4 – 8 yrs	1 person for every 6 children	1 : 6
9 – 12 yrs	1 person for every 8 children	1 : 8
12 - 18 yrs	1 person for every 10 children	1 : 10

Sleeping on church premises (children and young people)

Churches sometimes arrange sleep-overs for children, or church premises may be used, for example, during pilgrimages or missions.

- When part of the activity is for children to remain together as a group, separate sleeping areas must be organised for girls and boys.
- If possible separate washing and toileting should be provided, or different times for washing arranged, to ensure privacy.
- The required ratio of adult leaders should be followed, including a gender balance.
- Children under the age of 18 must not be left alone overnight.
- Ensure a rota of awake adults during the night or at least until all the youngsters have settled down.
- There should be two separate routes out from the sleeping accommodation.
- It must be possible to open all external doors. They should not be locked.
- All exit routes should be clearly marked.
- All internal doors should be kept closed at night to prevent the spread of smoke or fire.
- Portable fires should be placed in safe positions and turned off at night.
- All adults should have access to a torch and a telephone.
- There should be no smoking anywhere on the premises.
- A list of those present should be hung up near the main exit door. Everyone should know where outside to assemble and a roll call completed.
- Anyone discovering a fire should raise the alarm by shouting FIRE.
- The fire service should be called to all fires. Use the 999 facility.
- Make sure that cars do not block the exits or access for emergency vehicles.
- Adults should know where to locate firefighting equipment and how it is operated. This equipment should only be used if safe to do so.

Taking children off the premises

If children are to be taken off church premises for any reason Leaders should always:

- Obtain written permission from parents, guardians or PCC. This permission may be granted for a given period of time, e.g. a term.
- Ensure a named person at 'home base' for each activity holds the registration details for all children and leaders who are away from church premises, and is available by phone throughout the period of absence in case of emergencies. This person should have the itinerary and be aware of the plans, including estimated time of arrival at the destination, and estimated time of return.
- Carry with them the registration and consent forms for all children in the group.
- Carry mobile phones, and have readily accessible on their phone the contact details of other leaders of the group, and the named person at 'home base'.
- Ensure a first aid kit is carried.
- Ensure parents are informed if their children are to be transported by car or in another vehicle. Persons transporting children by car should be familiar with our transport guidelines (following section). They need to ensure they are complying with the requirements and have completed the Transport Undertaking form.
- If a journey is interrupted by a stop when the child, young person or adult leaves the vehicle a role call must be taken before the journey is resumed.
- If youth leaders arrange to meet young people in coffee shops etc., ensure a record is kept of when the event occurred and in what circumstances.

Transport in private cars or minibuses

Transport arrangements to or from church activities are the responsibility of parents or carers of individual children and adults.

If the PCC or church organises transport the arrangements are the responsibility of the PCC and the following guidelines and procedures should be observed. Transporting children and adults who may be vulnerable on behalf of the church is a regulated activity and those organising outings requiring the use of private cars or minibuses are responsible for ensuring that drivers are aware of the procedures.

- Approved drivers must be recruited according to the Diocesan Safer Recruitment procedures. This includes the requirement for a satisfactory Disclosure and Barring Service reference.
- To ensure that this procedure is adhered to, you are advised to obtain from those people who are recruited to transport children or adults who may be vulnerable in their cars or drive minibuses a signed 'Transport Undertaking' form and a copy of their driving licence and their insurance certificate to hold on file.
- Children should not be taken out in transport without the prior consent of their parents or carers
- Adults who may be vulnerable should give permission to being transported themselves, and discretion used in consulting first with their carers or family.
- Care should be taken when assisting children or adults who may be vulnerable to board and alight vehicles, both to ensure the road is safe to do so and in following the guidelines on physical contact.
- Another responsible adult should accompany the driver, to assist with any emergencies.
- Gender balance for escorts should be considered in relation to male and female passengers.
- If in an emergency a driver has to transport one child or vulnerable adult on his or her own, the child or vulnerable adult must sit in the back of the car.

The driver:

- All those who drive children or adults who may be vulnerable on church organised activities should be over 21 and should have held a full current driving licence for over two years.
- Any driver who has an endorsement of more than 6 points on their licence should inform the Parish Safeguarding Officer.
- Any driver who has an "unspent" conviction for any serious road traffic offence e.g. a drink driving offence or dangerous driving or racing on the highway should not transport children or adults who may be vulnerable for the church.
- Drivers who are not children's or adult workers should be recruited for the task through the normal recruitment process.
- Drivers must always be in a fit state i.e. not under the influence of alcohol; not taking illegal substances; not under the influence of medicine which may induce drowsiness.

The vehicle:

- Only cars fitted with seat belts (both front and rear) may be used, and the numbers of people transported should not exceed the number of seat belts available.
- All car passengers are required to wear safety belts in the front and rear seats.
- All children up to 3 years old must be carried in a child restraint.
- Rear-facing baby seats must not be used in a seat protected by a front air-bag unless the air-bag has been deactivated manually or automatically.
- Children from aged 3 up to 135cm in height (approx. 4'5") or their 12th birthday (whichever they reach first) must use baby/child seats, or booster cushions for older children
- All passengers aged 13 years or older must wear an adult seat belt if available
- All cars that carry children or adults who may be vulnerable should be comprehensively insured.
- The insured person should make sure that their insurance covers the giving of lifts relating to church sponsored activities. It is the responsibility of car owners to check that their vehicle is insured for the

transportation of children or adults who may be vulnerable. While the transportation of passengers without reward (i.e. for petrol money only) would normally be covered under “social/domestic use”, vehicle owners MUST check with their insurers. Additional cover can very often be included for a small extra charge

- All cars that carry children or adults who may be vulnerable should be clean and in a road worthy condition

Publicising activities

- Keep parents, children and young people, adults who may be vulnerable fully informed of the programme of activities, including the venue, times and contact details for leaders, and make them aware of the ground rules for belonging.
- Advertise the Parish Safeguarding Children and Adults Policy and Procedures in summary on the church premises, and have it available for parents or carers on request.
- Publicise the name and contact details of the Parish Safeguarding Officer (this can be through a central contact point), with a clear process for how concerns should be raised.

Use of home venues (children and young people)

Activities for children will usually take place on church premises. In the event of leaders using their own homes for church activities, any activity which includes children under 18 years when their parents are not present will be subject to the Parish’s Safeguarding Children Policy and Procedures.

- Rooms will be checked for physical hazards, and be hygienic.
- Bedrooms will not be used in any circumstances.
- Two adults (preferably unrelated) will be present from before the first child arrives until after the last one leaves.

Working with disruptive children

Those working with children need to be clear about what behaviour is acceptable – and what is not – from children and young people.

If a child or young person is being disruptive:

- Ask him or her to stop.
- Speak to the child to establish the cause(s) of upset.
- Inform the child that s/he will be asked to leave if the behaviour continues.
- Consider at every stage calling the child’s parent or carer.
- Warn the child that if s/he continues to be disruptive, this may result in longer term exclusion from the group or activity.
- If a child is harming him/herself, another person or property, then escort other children away from the area where the disruption is occurring.
- If the request to stop is ignored, warn him/her that you may call for additional help (e.g. the police) if they do not stop.
- If they do not stop, call the police or other appropriate professional help.
- In exceptional circumstances, you may need to restrain the child to prevent them harming themselves, others or the property whilst you wait for the police.
- Ensure that the parent/carer of both the child, and any other child affected by the disruption (especially a victim) are informed of the incident, as soon as possible after it has taken place.
- Record the event as soon as possible after the incident, and inform the Parish Safeguarding Officer or incumbent.
- After the incident, consider with the Parish Safeguarding Officer what longer term sanctions are appropriate regarding this child, and what safeguarding steps regarding others in the group may be needed.

Unaccompanied children

Children may begin attending church services or church activities without their parents' or carers' knowledge. The following procedure is recommended:

- Welcome the child(ren) and try to establish whether their parents are aware of where they are.
- Try to discover when they are due home and encourage them to keep to that arrangement.
- Depending on the age and competence of the child, ring the parents or ask the child to ring to gain the parents' consent to the child remaining.
- Complete a registration form as far as possible.
- Make sure an adult recruited for work with children takes care of the child – this is particular important during public worship where unknown adults may attend and attempt to befriend the child.
- Give the child written information about the church service or activity to take home, including contact details.
- If the child comes regularly, endeavour to establish contact with the parents or carers.
- Never take the child on outings or transport them without their parents' or carers' permission.

Touch

We can all find physical contact potentially difficult, and we each have different boundaries of personal space, which may depend on our background, personality and cultural or ethnic norms. Sympathetic attention, humour, encouragement and appropriate physical contact are needed by children, young people and adults who may be vulnerable as part of their expression and understanding of human relationships. Because child and adult protection issues have become highly emotive, this has led to some people avoiding all occasions of touching children and adults who may be vulnerable. The following points regarding touch are offered as suggestions to follow:

- Be sensitive and sympathetic to the needs and wishes of the individual, and try to respond in a way which is neither patronising nor rejecting.
- Keep everything public. A hug in the context of a group is very different from a hug behind closed doors.
- Touch should be related to the child's or adult's needs, not the leader's or carer's.
- Touch should be age appropriate and generally initiated by the child or adult.
- Avoid all physical activity that is, or may be thought to be, sexually stimulating to the child or the adult.
- Children and adults have the right to decide how much physical contact they have with others, except in exceptional circumstances where they may need medical attention.

Restraint

Restraint is where a child or adult is being held, moved or prevented from moving, against their will, because not to do so would result in injury to themselves or others, or would cause significant damage to property. You are advised to seek training, from your local police or local authority, for leaders in appropriate restraint techniques and how to diffuse volatile situations.

- Restraint must always be used as a last resort, when all other methods of controlling a situation have been tried and failed
- Restraint should never be used as a punishment or to bring about compliance (except where there is a risk of injury).

- In all cases where restraint is employed, the incident and subsequent actions should be documented and reported, and this should include written and signed accounts of all those involved, including where possible the child, young person or adult. The parents or carers should be informed the same day.

Children or adults in distress

There will be occasions when a distressed child or adult needs comfort and reassurance, and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for instance after a fall, or separation from parent. Leaders should use their judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear boundaries.

Intimate and personal care

It may sometimes be necessary for leaders to do things of a personal nature for children or adults, particularly if they are very young or are disabled. These tasks should only be carried out with the full understanding and consent of the parents or carers, and every effort should be made to ensure that the child or adult who may be vulnerable also understands and gives informed consent, taking account of their disability or impairment. Adults should avoid any physical contact when children or adults who may be vulnerable are in a state of undress, avoid any visually intrusive behaviour, and where there are changing rooms, and announce their intention of entering. Generally, leaders should not change in the same place as children, shower or bathe with children, or assist with any personal care task which the child or adult who may be vulnerable can undertake by themselves.

Relationships of trust

Genuine relationships may occur between adults, one of whom is in a caring role with another who is more vulnerable. No intimate relationship should begin while the member of staff or voluntary worker is in a position of trust over them. The power and influence that a person in a position of trust has over someone attending a group or activity or in a counselling situation cannot be under-estimated; such an abuse of trust with a person under 18 years may be a criminal offence (Sexual Offences (Amendment) Act 2000).

“The inequality at the heart of a relationship of trust should be ended before any sexual relationship begins.”
Caring for Young People and the Vulnerable Guidance for preventing abuse of trust (Home Office 1999)

Communicating with young people

Young people communicate primarily through social media, email and mobile phone and it is essential for our ministry that we engage with them effectively and safely. Social media is continually changing and these guidelines will be reviewed and updated annually.

‘Young people’ are defined as those in school years 7 to 13 or equivalent. Where a young person reaches the age of 18 before leaving our youth work provision it is good practice to adhere to this policy. Children in year 6 and below should not normally be communicated with using social media or mobile phones.

TMM Consent Forms

Parents and guardians will be given the option to consent to the following:

- Photos to be taken by a designated photographer at youth event and then used in official St Andrew’s publications, our Facebook Page, the church website and displays.
- Young people may have email contact with staff and volunteers in accordance with these guidelines.
- Young people may make and receive calls and texts to and from staff and volunteers in accordance with these guidelines.
- Young people may connect to their group’s Facebook page.

For all forms of communication

Communication should not usually take place with young people before 7.30 am after 9.30pm or on staff members' days off. Note this doesn't mean staff and volunteers have to be available to young people at all other times.

Young people should be advised that, whilst staff and volunteers will exercise appropriate discretion in dealing with the substance of communication, they cannot promise confidentiality.

Emails

- Once permission is given, staff and some volunteers (small group leaders, mentors and group leaders) may hold email addresses for young people in their groups.
- Emails should be short and usually be a one-off communication to arrange a meeting or remind young people to attend an event.
- Emails should be kept on file, so that they can be traced if necessary in accordance with Hertford St Andrew's guidance on record keeping in parishes.
- Conversations should not be by email. Staff and volunteers should arrange to meet in person, although never alone, with a young person if the young person would like to talk.
- If an email raises any child protection concerns, the line manager and Parish Safeguarding Officer should be informed as soon as possible.
- When a volunteer leaves the youth work team, the young people's email addresses should be removed from their personal address book.
- Staff should only email using their work account and not personal email accounts.

Phone calls, Texting, instant messaging, Whats App, etc.

- Once permission is given, staff and some volunteers (small group leaders, mentors and group leaders) may hold mobile phone numbers of the young people in their groups.
- Text communication should be short and usually be a one off communication to arrange a meeting or remind young people to attend an event.
- Staff and volunteers should use an appropriate tone; friendly but not over-familiar or personal. While communications should be warm and friendly, they should not suggest or offer a special relationship.
- Staff and volunteers should only give personal contact details that are within the public domain of St Andrew's, including their mobile phone number. All staff working with young people should only use their work phone. Volunteers should only text from private phones as an exception.
- Conversations should not be had over texts. Staff and volunteers should arrange to meet in person, although never alone, with a young person if the young person would like to talk.
- Staff and volunteers may have phone calls with young people, but these should be short.
- If a disclosure is made that raises a safeguarding concern, verbatim notes should be made as soon as possible. This information should be reported to the line manager and Parish Safeguarding Officer as soon as possible and the records kept on file for a term in accordance with the Hertford St Andrew's guidance on record keeping in parishes.
- When a member of staff or volunteer leaves the youth work team, young people's numbers should be removed from private phones and any other digital or written record, and work phones should be returned to St Andrew's for secure storage.

Video Conferencing

Please see our Video Conferencing Guidelines 2023

Social Media (see also our Social Media Policy 2022)

Instagram *to be reviewed when Youth Worker position has been filled. Instagram not currently used – May 2023*

The most effective way of communicating with the young people who currently attend TMM is through an Instagram group chat. This group chat is managed as follows:

- Young people follow the St Andrew's Youth Worker TMM Instagram account which is a private account. The account is only used for information relating to TMM.
- Youth worker does not follow the young people on Instagram.

Snapchat or similar apps

- Staff and volunteers should not connect with young people on Snapchat
- Staff and volunteers should not befriend/follow/message/or post photos of young people on Snapchat or similar apps.

Facebook

Schools and secular youth work policies recommend that an adult should not be friends with an under 18 on Facebook. St Andrew's accepts this recommendation. Private messaging is not permitted.

- Volunteers and staff should not be friends on Facebook with an under 18 where their contact has been established through their role as a staff member or volunteer.
- Once a young person has left our youth work provision at 18 it is then the volunteer or staff member's choice whether to be a Facebook friend with them.
- Each group may have a Facebook group. They should follow the policy on the group page.
- The group must be closed.
- The group must be monitored by at least two staff/volunteers who have admin rights.
- Young people, staff and volunteers can become a member of this group.
- Communications can occur openly through comments and posts on the page.
- Events can be posted on the page.
- Once permission is given, photos of events and young people can be posted on the page.
- Privacy settings on photographs should be set to ensure that only members of the group see them.

Twitter

- Young people can follow staff and volunteers on Twitter. Leaders should be aware as they tweet that they are a role model to young people.
- Direct private messages should not be sent or responded to as these are a hidden form of communication.
- Staff and volunteers must not follow young people on Twitter.

YouTube or similar

- Staff and volunteers should not subscribe to any young person's YouTube channel.
- The group may have its own YouTube channel which should be a closed group site.
- The site can be used to post suitable material to encourage the young people in their journey of faith.

First Aid

Adults working with children and adults who may be vulnerable should be aware of basic first aid techniques. It is important that at least one of the leaders in a children's group or a group for adults who may be vulnerable has attended a recognised First Aid course or that a trained first aider is on site and can attend swiftly.

- Where First Aid is required, wherever possible adults should ensure that another adult is aware of the action being taken.

- Parents and carers should always be informed when first aid has been administered.
- If the injury appears to be serious, the emergency services should be called without delay.
- If First Aid in an emergency needs to be administered by untrained staff, they should act reasonably and do the minimum necessary to preserve life and limit the consequences of injury until qualified assistance is obtained.
- Parents or carers should be contacted promptly in the event of an accident to a child or young person or vulnerable adult.
- In the case of a slight injury, the parent or carer should be told when the child or vulnerable adult is collected, or informed soon after the activity.
- Leaders should have available contact details for the Accident and Emergency Departments of the local hospital, and any other out of hour's emergency services.

There is a risk that a leader undertaking First Aid could face an allegation of negligence if an injury worsened, but this is a remote risk, provided the leader has acted reasonably in a genuine attempt to assist in an emergency.

Administering medication

- No medicines should be given without the prior permission of the parents or carers.
- In circumstances where children or adults who may be vulnerable need medication regularly, a health care plan should be established as soon as possible, in order to ensure the safety and protection both of the child or adult who may be vulnerable, and of the adults who are working with them. Details of this should be included in the registration form.
- Depending upon the age and understanding of the child or vulnerable adult, they should where appropriate be encouraged to self-administer medication or treatment, including for example any ointment, or use of inhalers.
- In hot weather, children and adults who may be vulnerable should be asked to bring with them sun protection, suitable head covering and a bottle of water. Leaders may wish to carry a supply of anti-allergenic sun cream and water for protection of young children.

Visiting adults who may be vulnerable in their homes or residential homes

- Always do an assessment of risk before visiting someone in their own home. If there are any concerns or risks known before the visit is undertaken, give careful consideration to whether the visit is absolutely necessary.
- Try to visit in pairs where possible.
- Wherever possible, carry a mobile phone on a home visit, and ensure that someone knows where you are and when you are expected to return.
- Avoid taking unnecessary risks.
- Wherever possible avoid calling unannounced – call by arrangement, if appropriate telephoning the person just before going.
- If not known to the person you are visiting, carry identification, or a note of introduction from the church.
- Always knock on the door before entering a room or home, respecting the person's home and possessions.
- As a general principle, don't give your home phone number or address. Instead, where possible, leave information about a central contact point i.e. the church office.
- If you feel uncertain or out of your depth, seek advice from the Parish Safeguarding Officer. If appropriate, after taking advice, refer the person to another agency.
- When referring someone on to another person or agency, talk this through with the vulnerable adult. Ask his/her permission before passing on personal information. Make the link with the new person/agency yourself: if it is more appropriate for the vulnerable adult to do so themselves make sure they have all the information they need and that their contact will be expected.

- Be clear about boundaries – keep to agreed limits on how much time you will spend with someone and how often you visit. Avoid taking on extra responsibilities on a bit by bit basis. Seek to be realistic about the amount of time you have – not saying yes to every request for help.
- Be clear about what behaviour is acceptable – and what is not – from the vulnerable adult.
- Remember the needs of carers – treating them as individuals, including them if they wish, offer breaks where possible.