

## **1. Introduction**

### **Safeguarding**

The production has the responsibility to ensure that their crew, vendors, sub contractors, and other stakeholders do no harm to children, young people or vulnerable adults (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the work that they undertake, are dealt with and reported to the appropriate authorities.

It is also the responsibility that the organisation has for protecting its crew, vendors, sub contractors and other stakeholders when they are vulnerable, for example, when ill or at risk of harm or abuse.

### **Child protection**

Is part of, but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of power and trust over them.

As a consequence, there has been a significant increase in the efforts made by organisations to ensure that no harm results from their stakeholders interacting with vulnerable people.

Through their work, production crew, vendors, subcontractors and other stakeholders may engage with young people and vulnerable adults either directly or indirectly.

The production recognises it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults, including those with whom we work.

## **2. Purpose**

The purpose of this policy and procedures is to provide clarity to ALL on how they should engage with children, young people and vulnerable adults when working for or on behalf of the production. It is also to help us make sure that production crew, vendors, subcontractors and other stakeholders are protected.

It is intended to help us to have a common understanding of safeguarding issues, and develop good practice across the areas in which we work.

Whilst it is recognised that local legislation may vary from country to country, this policy identifies the minimum standards required and may exceed the requirements of local legislation.

Any breach of this policy will be treated as a disciplinary matter and if appropriate reporting to the police, relevant regulatory authority or other body.

## **3. Definitions**

### **Abuse**

A violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

### **Discriminatory abuse**

Abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

### **Financial or material abuse**

Including theft, fraud, exploitation, pressure in connection with possessions or benefits.

### **Neglect**

The persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or

failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

**Physical abuse**

Includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

**Psychological abuse**

Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability.

**Sexual abuse**

Involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

**Child**

In the UK a child is anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

**Vulnerable person/people**

For the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults.

**Vulnerable adult**

A person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

**Youth or young people**

Individuals aged 15 to 25. It is recognised that this group spans the categories of 'children' and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

**4. Scope**

This policy is mandatory for all production crew. For the purposes of this policy, 'production crew' is defined as anyone who works for or on behalf of the production, either in a paid or unpaid capacity.

This policy demonstrates how the production will meet its legal obligations and reassure stakeholders, employees, members of the public and licensing bodies:

- On what they can expect the production to do to protect and safeguard vulnerable people.
- That they are able to safely voice any concerns through an established procedure.
- That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
- That there is an efficient recording and monitoring system in place.
- That a robust 'safe' environment is in place. There are additional procedures in place that apply to those that work or have contact with, either directly or indirectly, children, young people or vulnerable adults.

**5. Policy Statement**

The production has a zero tolerance against abuse and exploitation of vulnerable people. It also recognises that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work.

The Production works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language,

religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- The production will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- The production will ensure that employees are inducted in our Safeguarding Standards
- When working with or through our vendors, the production will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- The production recognises that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- The production respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- The production commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.
- Cultural sensitivity; The production seeks to always work in ways which are culturally sensitive and that respect the diverse nature of the people that are in our employment. We recognise that there are many different ways of thinking and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act. We endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

## **6. Responsibilities**

### **All**

All production crew, vendors, subcontractors, stakeholders and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with the production will:

- Read, understand and adhere to the safeguarding & child protection policy
- Strive to promote a zero tolerance approach to discrimination, sexual harassment and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Report any concerns they may have about the welfare of a child or vulnerable person
- Report any concerns they may have about the behaviour of a production employee in relation to safeguarding
- Production employees should never be in a one-to-one situation with a child or young person.

All people working with the production will not:

- Sexually harass, assault or abuse another person
- Physically harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

### **HOD's**

HOD's and Supervisors at all levels are responsible for ensuring production crew, vendors, subcontractors and stakeholders are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

### **Designated Safeguarding Officers**

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy.

The lead designated safeguarding officer is responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- ensuring this policy is reviewed every 3 years or earlier if necessary
- ensuring it is implemented throughout the organisation
- ensuring monitoring and recording procedures are implemented

### **Executive Producer**

The Executive Producer is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with the production is equipped and supported to meet their responsibilities.

## **7. Procedure Overview**

### **If a child is in immediate danger:**

If a production employee thinks that a child is in immediate danger or at risk they are to make a referral to children's social care and/or the police immediately. **Anyone can make a referral.**

- Tell the Designated Safeguarding Officer as soon as possible if you make a referral directly.
- The following link provides additional guidance for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

### **When a child discloses abuse:**

Below are 8 steps to take when a child discloses an allegation to an employee of the production. This policy will then look at each step in more detail:

1. Stay calm and listen
2. Go slowly
3. Reassure them that they have not done anything wrong
4. Be supportive
5. Gather essential facts
6. Tell them what will happen next
7. Report
8. Make notes

### **Stay calm**

- An abused or neglected child or young person needs to know that you are available to help them.
- Reactions of shock, outrage, or fear might make them feel more anxious or ashamed.
- A calm response reassures that what has happened is not so bad and can be worked through.

**Go slowly**

- It is normal to feel inadequate or unsure about what to do or say when a child or young person tells you about their abuse.
- Proceed slowly.
- Gentle and open-ended questions such as: "Can you tell me more about what happened?" are helpful.
- Avoid questions that begin with "why".

**Be reassuring**

- Reassure the child or young person that they have not done anything wrong.
- Avoid questions that are usually associated with getting into trouble. Avoid using "why" questions.

**Be supportive**

Let the child or young person know:

- They are not in trouble.
- They are safe with you.
- You are glad that they have chosen to tell you about this.
- They have done the right thing telling about this.
- You are sorry that they have been hurt or that this has happened to them.
- You know others who can be trusted to help solve this problem

**Get only the essential facts**

- Be brief.
- Limit your discussion to finding out generally what took place.
- When you have sufficient information and reason to believe that abuse and/or neglect has occurred, gently stop gathering facts and be supportive.

**Tell them what will happen next**

- Don't make promises to the child about what may or may not happen next.
- Provide only reassurance that is achievable.
- Discuss with the child what you think will happen next and who will be involved.

**Report to the Designated Safeguarding Officer**

- Report disclosures of abuse or neglect immediately to the safeguarding officer for follow-up and referral.
- Express your willingness to help the child through the next steps, if appropriate.



**Make notes**

- Make notes of all comments. Use the child's or young person's exact words where possible.
- Save all drawings and artwork. This information may need to be shared with Children's Social Services and the police.

**Data Protection**

The production will ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian. Except for where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident.

**Minimum Standards**

When the production is working with vendors or external stakeholders, they will brief them on our safeguarding policy and ask for information on how their organisations work to protect vulnerable people and ensure that they meet our Safeguarding Standards.

**Social Media**

The production has a policy regarding the media and the use of actual names, images, including photographs and recordings. This should be applied in all situations. Specifically relating to protection of children, young people and vulnerable adults, we will:

- Use names and images of children, young people or vulnerable adults which are respectful and will not expose them to further vulnerability (not degrading or showing sexual images of children naked or partially clothed).
- Reproduce images and use names of children only where we have the written permission from their parents / guardians.
- Reproduce images and use names of young people and vulnerable adults only where we have their written permission or that of their parents/guardians, whichever is the most suitable.
- Make clear to vulnerable people and their families that agreement to providing information or images is not a condition of involvement in production activities.
- Inform employees, vendors and stakeholders about the production policies in relation to the use of technology, and understand that they must not use technology for the purpose of accessing, producing or distributing any information or violent or sexual images that are harmful to vulnerable people. This includes adult pornography.

Ensure that the production has a format for carrying out and implementing risk assessments at all levels of the organisation.

The production will train and support the designated safeguarding officers in their work and in any action they may need to take in order to protect vulnerable people.

## **8. Raising & Responding to Concerns**

The production places a mandatory obligation on all employees, vendors and stakeholders to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of vulnerable people. It also requires reporting to take place when this policy may have in any other way been breached. It is not the responsibility of the employees to decide whether or not abuse has taken place, however, concerns should be raised with an individual's HoD, line manager or a designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse.

Designated Safeguarding Officers are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently, and referred to the relevant statutory authority.

To ensure that all such situations are handled appropriately and effectively:

- Reports must be made, decisions and actions taken
- The production is not an investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual, and that any evidence is collected in accordance with the law.
- All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.
- Where an employee is the subject of an investigation, the lead designated safeguarding officer will lead the case.