

NAS Media Safeguarding Policy & Procedures



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1. Safeguarding Policy

1.1 Policy Statement

NAS Media provides careers/further education events for young people to introduce them to potential employers, education or training providers. This is done both in person and virtually.

NAS Media seeks to create and proactively ensure that the events they provide have measures in place to prevent and deter any actions or omissions, whether deliberate or inadvertent, that places young people at risk of any kind of harm. We have a duty of care towards those that engage with our events. This applies to all our work across Great Britain.

1.2 Policy Principles

NAS Media believes:

- All young people have an equal right to protection from abuse and neglect, regardless of their age, disability, gender reassignment, sex, nationality, race, religion or beliefs, sexual orientation, marriage and civil partnership, pregnancy or maternity, or any other additional vulnerability.
- The best interests of the child (anyone up to age 18 years) are paramount in all considerations about their welfare and protection, including when to maintain confidentiality and when to share information.
- The entire staff contingent has a role to play in safeguarding young people.
- Concerns or allegations that NAS Media staff have abused or neglected a young person will be managed sensitively and fairly in accordance with this policy, relevant legislation and local safeguarding procedures.
- Working together with young people, their families, our partners and the authorities is essential in promoting welfare and ensuring the protection of young people.
- As part of working together, NAS Media expect the relevant authorities to act on our concerns. We will escalate our concerns, where necessary, in our efforts to be satisfied that our concern has been taken seriously and the young person has been protected.

1.3 Consequences of abuse

Abuse can have both short and long-term consequences. The impact can include serious injury, disability, threats to survival or even death. It can affect a person's development, mental health, ability to form relationships, self-esteem, confidence or achievements in education or work. It can have huge personal and economic consequences for the individual, their family, community and society. Hence the necessity of doing everything possible to prevent abuse wherever possible and to protect children and adults at risk whenever we identify it may be happening.

1.4 Purpose and Scope

The policy and the accompanying procedures provide clear processes for all our staff and contractors. This ensures that everyone is clear about their roles, responsibilities and expectations to protect young people from harm.

It is the responsibility of staff and contractors to act if there is a cause for concern about a young person or the behaviour of an adult towards a young person but it is not their responsibility to determine if abuse has occurred or what protective action is required. Responsibility for deciding whether to escalate a concern to the appropriate authority lies with NAS Media's Designated Safeguarding Officer or Deputy.

1.5 Application

This policy and the safeguarding code of conduct and procedures apply to NAS Media staff and anyone working on our behalf.

NAS Media requires that our partners, current and future, share our commitment to safeguard.

1.6 Breaches

Breaches of the Safeguarding Policy, Procedures and the Code of Conduct will be taken seriously and acted upon when necessary by Simon Bennie, Managing Director.

1.7 Our commitment to safeguard

NAS Media will fulfil its commitment to safeguarding by:

- Valuing, listening to and respecting young people who engage with our events.
- Providing a safeguarding code of conduct for employees, exhibitors and visitors
- Ensuring suitable staff are recruited by adopting safer recruitment, selection and vetting processes.
- Building awareness and skills about safeguarding through induction and training.
- Risk assessing and mitigating for any safeguarding risks in our events (both in person and online).
- Establishing safeguarding governance arrangements with assigned roles and responsibilities.
- Identifying the safeguarding implications of all existing and proposed new projects or developments.
- Responding in a timely and appropriate manner to safeguarding concerns or allegations.
- Promoting a culture of safeguarding where staff feel able to speak out without fear of recrimination, harassment or bullying.
- Perform due diligence, which includes safeguarding, with other organisations that deliver activities or events involving young people on behalf of NAS Media.
- Maintaining a risk register which includes any outstanding safeguarding risks.
- Raising awareness of our safeguarding policy and procedures, both within NAS Media, with vFair and with all those whom we partner or run events on their behalf.
- Monitoring and reviewing our safeguarding practice and identifying any lessons learnt.
- Reviewing our safeguarding policy, procedures and code of conduct every two years or sooner if required due to legal changes, changes in what we deliver or learning from incidents.

1.8 Terminology

For the purposes of this policy and procedures, the following terms and definitions apply:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

Child: Legally, a child includes babies, children and young people from pre-birth up to 18 years. The fact that a young person has reached the age of 16, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody does not change his/her entitlement to protection. This applies to England, Wales and Northern Ireland.

In Scotland, there is a variance to this where a child is someone up to the age of 16 years unless the child is subject to a supervision requirement by a Children's Hearing, in which case they are considered a child until the age of 18 years¹.

¹ See *National Guidance for Child Protection in Scotland 2014* (para 21-24) for more detailed guidance

Safeguarding and promoting the welfare of children²

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This means:

- protecting children from abuse and maltreatment
- preventing impairment to children's physical and mental health and/or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes
- educating those around children to recognise the signs and dangers of abuse and neglect

Child protection: This is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Different types of abuse (e.g., physical, emotional, sexual or neglect) may constitute significant harm. More details about abuse are presented in **Appendices 2-6**.

Adult is legally anyone aged 18 or over.

Adult at Risk is a person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); *and*
- Is experiencing, or is at risk of, abuse or neglect; *and*
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Adult Abuse is a violation of an individual's human and civil rights by another person or persons.

Safeguarding Adults means protecting people's rights to live in safety, free from abuse and neglect; people and organisations working together to prevent the risk of abuse or neglect, and to stop it from happening; and, making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account

Young person: In this document, we use the term young person to cover those with whom we work aged 14-25 years normally. However, we recognise that for the purpose of safeguarding there are difference in terms of the law and guidance for children and adults at risk.

Contextual safeguarding: Children and young adults may be vulnerable to abuse or exploitation from outside their families such as at school, from their peer group, or from within their wider community or online. These threats can take different forms such as exploitation by criminal gangs, trafficking, online abuse and radicalisation.

Paramountcy principle A key principle of the Children Act 1989 is that the welfare of the child is paramount. This refers to a child centred approach which is fundamental to safeguarding every child. It means keeping the child's best interests in focus and at the heart of all decisions about them.

² Department for Education (DfE), 2018; DfE, 2020; Department of Health, 2017; Wales Safeguarding Procedures Project Board, 2019; Welsh Government, 2020

1.9 Relevant NAS Media policies and procedures

Safeguarding and promoting the welfare of young people is a broad concept. Other NAS Media policies and procedures which contribute to safeguarding must also be followed by those to whom they apply or when relevant to the situation. They are as follows:

- Exhibitor Code of Conduct
- Visitor Code of Behaviour
- Employee Code of Conduct

1.10 Law, guidance and standards

Safeguarding at NAS Media is underpinned by legislation and statutory guidance: See **Appendix 1** for details of the legislation.

2. Safeguarding governance arrangements

2.1 Roles and responsibilities

All NAS Media staff, have a responsibility to:

- Identify and share safeguarding concerns
- Consider the safeguarding implications of all existing and proposed new projects or developments in their area in conjunction with their line manager.

In addition to the above, the roles listed below hold additional responsibilities for safeguarding:

2.1.1 Safeguarding Director (SD)

- Provide support and direction to designated safeguarding officer
- Lead on the implementation of the Safeguarding policy
- Identify and be accountable for a system to quality assure and monitor compliance with safeguarding requirements
- Ensure that staff are inducted, trained and supported relevant to their role and responsibility for safeguarding
- Manage any safeguarding allegations that arise against staff, volunteers or contractors
- Ensure the safeguarding policy and the online safeguarding policy are reviewed
- Ensure that safeguarding is integrated into contractual arrangements with partners or third parties
- Ensure that safeguarding is considered in delivery of events
- Ensure roles and responsibilities for child safeguarding are agreed with any third-party event organiser
- Ensure staff understand and adhere to the procedure regarding the creation and use of images and film and their retention, storage and destruction
- Ensure that safeguarding is appropriately integrated within all social media activities
- Ensure that NAS Media are Data Protection compliant in respect of all data concerning records of young people.
- Ensure staff are safe and suitable for their roles which involve engagement with young people.
- Alert the DBS in cases where a person is dismissed or left NAS Media due to the harm or risk of harm they present to young people.

The SD is: Simon Bennie: 07496 054211 simon@nasevents.co.uk

2.1.2 Designated child safeguarding officer (DSO)

- Determine what response is necessary to address a safeguarding concern about young person.
- Refer cases of suspected abuse or allegations in line with the safeguarding procedures.
- Ensure accurate written records of referrals/concerns are made, stored securely and shared appropriately.
- Ensure that an individual case record, including the outcome, is maintained of any response and action taken by NAS Media.
- Provide information and advice on safeguarding to staff.
- Support colleagues with any safeguarding queries or planning for the safeguarding elements of any events.

The DSO is: Meg Kanka: 0208 159 2414 meg@nasevents.co.uk

3. Safeguarding Procedures

3.1 The Five R's

These procedure follows the *five R's* as follows:

- **Recognise** that a child is being harmed or is at risk of harm
- **Respond** appropriately to someone who is telling you what is happening to them
- **Refer** the concerns to the Designated Safeguarding Officer (DSO) who will decide what action to take next
- **Record** the concerns and all other actions
- **Resolution** by the DSO of the referral, follow up referrals made to other agencies and possible escalation if concerns remain.

3.2 Recognise that child has been abused or neglected

Different types of abuse may be occurring simultaneously or sequentially. **Appendices 2-6** contain the following information to supplement the policy and procedures so that everyone is more confident about how to recognise child abuse and neglect concerns:

- statutory definitions of child abuse and neglect - **Appendix 2**
- indicators of child abuse - **Appendix 3**
- grooming behaviour – **Appendix 4**
- additional guidance on children and young people abused in specific circumstances- **Appendix 5**
- indicators of adult abuse – **Appendix 6**

3.3 Non-recent historic allegations of abuse.

Any disclosure or concerns that relate to abuse that happened more than a year ago, whether involving anyone working at NAS Media or outside of it, must be taken seriously and acted upon in line with the procedures outlined in **Section 4 and 6**. Often survivors of abuse take years to come forward due to shame and a fear of being disbelieved however, the alleged perpetrator may remain a risk to others and therefore all non-recent historic allegations should be examined by the authorities. NAS Media will work in partnership with local authorities and/or the police in such cases.

3.4 Additional vulnerabilities

Some young people are particularly vulnerable to abuse. For example, research shows that disabled children are more likely to be a target for abuse. Equally care-experienced children and young adults, or those that have already experienced harm, may be more vulnerable.

3.5 How safeguarding concerns may arise

A concern about the safety of a young person might arise because:

- a young person says that they are being abused or says something that might have harmed them now or in the past
- you notice signs of abuse or neglect
- somebody else says a young person is being harmed or is at risk of harm
- the behaviour of an adult (e.g., NAS Media staff or a customer) towards a young person or the behaviour of a young person towards another young person
- you receive a complaint about someone's behaviour

4. Respond: What to do if you have a safeguarding concern about a young person

- 4.1** If you identify a safeguarding concern either at in person events, during online contact, through social media or any other contact which is not immediately life-threatening or presents a high risk of serious harm, you must:

Step 1 Contact the DSO to discuss your concern. This should be done on the same day that you identify the concern.

Step 2 A record of what was seen, said and done needs to be made on the Safeguarding Report Form – see **Appendix 8**. If you have this form to hand then complete it, otherwise the DSO will complete it when you speak with them.

Step 3 The DSO will determine what action is necessary. The options are to:

- take no protective action as it does not constitute a safeguarding concern but consider signposting to other sources of help
- seek advice from one or more of the following: the SD, children's social care or adult social care, police, NSPCC Helpline, Professionals Online Safety Helpline
- notify the relevant school, FE college, training provider or university of the concern
- notify the NSPCC Helpline who can advise and/or make a referral to the relevant local authority or police if required in cases where the young person is not linked to a school or FE college or university.

Step 4 The DSO must record whatever decision is made with a rationale even if no further action is taken.

Step 5 The DSO must consider if the person who first raised the concern needs any support and who is best able to provide it.

Step 6 The DSO should follow up with the designated safeguarding lead from the school/college/university to check they have received the concern and have taken appropriate action to address it. A record of the outcome should be made.

4.2 Responding to a direct disclosure of abuse

Sometimes a young person may share their experience of abuse or the way they are or have been treated by someone else. If ever this situation arises then staff should respond as follows and the follow **steps 1-6** above.

Do

- ✓ Show you care, give your full attention to the young person and keep your body language open and encouraging. Be understanding and reassure them their feelings are important.
- ✓ Take your time, slow down: respect pauses and don't interrupt the young person – let them go at their own pace.
- ✓ Show you understand, make it clear you're interested in what the young person is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.
- ✓ Reassure them that they've done the right thing in telling you and that abuse is never their fault.
- ✓ Explain what will happen next in terms of the process.

Do not:

- × React strongly – for instance saying, 'that's terrible.'
- × Jump to conclusions especially about the alleged abuser.

- × Tell them you can keep this a secret.
- × Ask leading questions.
- × Make promises you cannot keep.
- × Stop them from speaking freely.
- × Tell them to stop talking so that you can fetch a DSO.

4.3 Responding to a child protection emergency

In rare circumstances, if there is a life-threatening concern about a young person's safety arising from the information disclosed to you either face to face or online, for example where: a young person has expressed suicidal thoughts/intentions or intends to harm another person; could be subject of further abuse if they go home; has contact with a registered sex offender; being groomed into terrorism; a serious crime has been committed or a young person has been seriously injured.

In such circumstances, you should:

- Ring 999 and ask for the emergency service required - police and/or ambulance.
- Inform the DSO afterwards.
- If the DSO is not available then inform the SD
- The procedures in **4.1** must then be followed by either the DSO or SD
- Alert the young person's family if appropriate otherwise this is the responsibility of the social worker/police/school/university

4.4 Responding to child-on-child abuse and bullying

Young people can harm each other for example there is evidence of domestic abuse in teenage relationships, sexual exploitation, exploitation in a gang context and serious online bullying. These types of harmful behaviours would need to be reported as any other safeguarding concern onto the DSO.

Bullying of a less serious nature between young people is prevalent and will need addressing if you identify it is happening. (See **Appendix 5** for types of bullying). This could involve speaking with the young person who has been bullied and the young person who has done the bullying. It may be necessary to notify the school, college or university safeguarding lead but this will depend on the nature of the bullying and its seriousness

Bullying behaviour should not be passed off as "banter" or as "part of growing up". It is important to be conscious that a young person who is engaging in bullying or abusive behaviour towards others may have been subject to abuse from others.

4.5 Young person seems troubled

If a young person says or hints that they may be worried about abuse or other issues that are upsetting them, give them the contact details for agencies that can help such as NSPCC Childline or The Mix. Make a record of having given such advice. **See list of support agencies.**

5. Information sharing, consent and confidentiality

- 5.1 In general terms, people have a right to expect that their personal information is not shared with other organisations and that their consent is obtained before sharing.
- 5.2 NAS Media has a duty to share information with other agencies to safeguard young people in certain circumstances when it is in the public interest, i.e., when there is a concern about actual or possible abuse/neglect or if we believe a crime has been committed.

Whilst consent to share information should be sought where it is safe and appropriate to do so, information may be shared without consent if there is good reason to do so as it is lawful to share such information without consent for the purpose of safeguarding and promoting the welfare.

Any information that is shared will only be shared on a need-to-know basis and these decisions will be made by the DSO.

- ✓ Never promise the young person or staff member to keep information confidential when it is about safeguarding concerns or allegations.

- 5.3 Government advice³ about when and how information can be shared is laid out in ‘seven golden rules’:
- i. the General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about individuals is shared appropriately.
 - ii. be open and honest with the individual (and/or their family) from the start about why, what, how and with whom information may be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
 - iii. seek advice from others including external agencies, if there is any doubt about sharing the information without disclosing the identity of the individual.
 - iv. where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. You may share information without consent if you consider on the facts presented that there is a lawful basis such as where safety may be at risk.
 - v. consider safety and well-being: base information sharing decisions on the safety and well-being of the individual and others who may be affected by their actions.
 - vi. necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
 - vii. keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

³ HM Government (2018) *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*

6. Respond and manage an allegation of abuse made against staff, contractors or customers

6.1 Application of the procedure

NAS Media takes seriously all allegations of abuse made against staff members, including temporary or fixed term contractors, and will follow the defined processes outlined here. NAS Media recognises its duty of care to employees and will act to manage and minimise the stress inherent in the allegations process.

The allegations management procedure will be used in cases where it is alleged that a staff member, has:

- behaved in a way that has harmed a young person, or may have harmed a young person; or
- possibly committed a criminal offence against or related to a young person; or
- behaved towards a young person in a way that indicates that they would pose a risk of harm to young people; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with young people.

6.2 Identifying an allegation

Allegations may arise in several ways, for example a report from a young person, a complaint from a parent/carer, or a concern raised by another adult. An allegation may concern someone's behaviour or actions within their job or a voluntary activity, or within their family or private life.

The concerns may be about any form of abuse or neglect. This will include concerns about inappropriate relationships between adults and children. For example:

- bullying behaviour
- aggression or physical assault
- a sexual relationship between a child aged 16 or 17 years with an adult in a position of trust with them, even if the relationship may appear to be consensual
- grooming, i.e., meeting a child under 16 with intent to commit a relevant offence (section 15 of the Sexual Offences Act 2003); or
- other behaviour that gives rise to concerns, such as possession of abusive images of children or inappropriate contact through texts or online, inappropriate messages, gifts or socialising with young people outside of work-related activity
- concern about a colleague's posts on their personal social networks

If an allegation or concern arises about a staff member outside of their work for NAS Media, then this may present a risk to young people for whom the staff member is responsible and the general principles outlined in these procedures will apply.

If NAS Media is not the primary employer we will notify the primary employer of the person subject of the allegation and they will be responsible for the case management of the allegation e.g., if there was an allegation of abuse against a stand representative at a NAS Media event.

6.3 Roles and responsibilities

Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member, contractor or customer must report the concerns immediately to the SD. In their absence, or if a SD is the subject of the allegation, concerns must be reported to the DSO or the Finance and HR Manager.

If no safeguarding staff are available then report the allegation to the NSPCC Helpline and inform the DSO and SD of having done so as soon as possible afterwards.

6.4 Initial action by the person noticing concerns or receiving an allegation first

- Treat the matter seriously and keep an open mind.
- Do not make assumptions or offer alternative explanations.
- Do not investigate or ask leading questions, if seeking clarification.
- Do not promise confidentiality but give assurance that the information will only be shared on a need-to-know basis.
- Act quickly.
- Make a written record of the information. Where possible, record the exact words of the person making the allegation or the child's own words.
- Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed. Record the time, date and place of alleged incidents, persons present and what was said, if these were mentioned by the person making the allegation.
- Immediately report the matter to the SD

6.5 Initial response by the SD

- Obtain written details of the concern or allegation by the person reporting it and date it. Record any decisions made and the rationale. Complete the safeguarding report form – **see Appendix 8** if it has not already been done.
- Alert the Finance and HR Manager.
- Decide if any further clarifying information is needed or advice from a relevant authority.
- Decide if any equipment (e.g., laptop or mobile phone) needs to be removed from the individual, as it might hold evidence of online abuse, or if their access to NAS Media channels must be suspended.
- Contact the local authority designated officer (LADO)⁴ immediately to report the allegation if it meets one or more of the criteria described in 6.1 or to consult with them if uncertain as to how to proceed. There is a need to distinguish between an allegation, a concern about poor practice or a complaint.
- Contact the police if it is thought a criminal offence has been committed including online abuse
- If the allegation requires immediate attention but is received out of hours, contact the children's social care Emergency Duty Team or the police and then inform the LADO as soon as possible thereafter.
- Refer allegations against a staff member who is no longer working at NAS Media to the police in the first instance and then inform the LADO.
- If the allegation does not meet the criteria described in **6.1**, then consider if the matter needs to be addressed through other employment processes.

6.6 Further actions by the SD and the LADO

- The SD and the LADO will consider the nature, content and context of the allegation and agree a course of action, including whether further information is needed. Many cases may well either not meet the criteria in **6.1** or may do so without warranting consideration of either police investigation or enquiries by children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.
- If the allegation is not demonstrably false and there is cause to suspect that a young person is suffering or likely to suffer significant harm, the LADO will refer the case to children's social care and ask them to convene a strategy meeting.
- The LADO will consult the police if a criminal offence may have been committed. If the threshold for significant harm is not reached but a police investigation may be needed, the LADO will immediately inform the police.

⁴ The LADO is involved in the overall management and oversight of individual cases (applies in England only). They will provide advice and guidance to the SD, liaise with the police and other agencies and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

- If an investigation by children's social care or the police is deemed as not necessary, the SD and the LADO will discuss the options open to the service depending on the nature of the allegation and the evidence available. This will range from taking no further action to dismissal or a decision not to use the staff member's services in the future.
- If the initial evaluation leads to no further action against the staff member concerned, both the SD and the LADO should record the decision and justification. Agreement should be reached on what information should be put in writing to the individual and what action should follow, including informing the person who made the allegation originally.

6.7 Persons to be notified

- After consultation with the LADO, the SD should inform the accused person about the allegation as soon as possible.
- However, if a strategy discussion is needed, or the police or children's social care need to be involved, the SD should not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the individual.
- In principle, the SD should inform the young person's parents/ carers about the allegation (if they are under 18 years) if the allegation is against a known young person. The LADO should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents/carers may need to be informed right away, e.g., if a person is injured and needs medical attention.

6.8 Confidentiality

- Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information sharing should be restricted to those who need to know in order to protect the child concerned, carry out the enquiries and manage the disciplinary process, if applicable.
- The boundaries of confidentiality and information sharing equally apply to those involved in the internal crisis response processes.
- The SD should discuss with the LADO how best to manage speculation, leaks and gossip within the charity and the community at large, and press interest, if it arises.

6.9 Supporting people

- The SD together with children's social care and the police, if they are involved, will consider the impact on the young person concerned and provide support as appropriate. In some cases, there may be no known victim e.g., if the concern is about the distribution of obscene images of children.
- The SD or LADO will ensure that the child and family are kept informed of the progress of the investigation.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association, or a colleague for support.
- The SD will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or children's social care investigation or disciplinary investigation.

6.10 Managing risk during the investigation

- The perceived level of risk during the investigation needs to be considered and managed. In some situations, the level of risk may require the staff member/ contractor not to be having contact with young people.
- Based on an assessment of risk, the SD and the Finance and HR Manager will determine what action to take with regards to the employment of the person – whether it is appropriate to suspend them or redeploy them into another role without young person contact whilst the investigation is carried out. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.
- Decisions about risk are best made in a multi-agency forum such as the strategy discussion. The LADO will canvass the views of the agencies participating and inform the SD. However, only the employer has the power to redeploy or suspend.

- If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by the SD and LADO. This should also include what alternatives to suspension have been considered and why they were rejected.
- Possible risks to the young person involved and any children in the accused staff member's home, work or community life will be evaluated and managed by children's social care and the police.

6.11 Timescales

- Cases will be resolved as quickly as possible, consistent with a thorough and fair investigation.
- It is expected that most cases should be resolved within one month and all but exceptional cases should be resolved within 12 months.
- However, the timing will depend on the nature, seriousness and complexity of the case and the right outcome is far more important than meeting timescales.
- Cases where it is immediately apparent that the allegation is unsubstantiated or malicious should be resolved within one week.
- The SD should discuss the timing of actions with the LADO for all allegations that do not require police involvement but for which there are child protection concerns.
- Disciplinary action should normally not be taken until the outcome of any external investigation has been completed.

6.12 Resignations and compromise agreements

- Every effort will be made to reach a conclusion to the case should the staff member refuse to cooperate, having been given a full opportunity to answer the allegation and make representation.
- Although it would not be possible to apply disciplinary sanctions if the period of notice expires before the conclusion of the investigation, the outcome of the disciplinary process will be recorded.
- NAS Media will not use 'compromise/settlement agreements' in respect of where there has been a safeguarding allegation, for example where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

6.13 Outcomes of an investigations

The following categories should be used in recording the outcome:

- **Substantiated** – there is sufficient evidence to prove the allegation
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False** – there is sufficient evidence to disprove the allegation
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded** - there is no evidence or proper basis which supports the allegation being made

6.14 Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to children's social care services to determine whether the child needs services or may have been abused by someone else.

6.15 Disciplinary or suitability process and investigations

The LADO, the SD and the Finance and HR Manager will discuss whether disciplinary action is appropriate in all cases where:

- it is clear at the outset, or decided by a strategy discussion, that a police investigation or section 47 enquiry is not necessary: or
- the police or the Crown Prosecution Service informs that the criminal investigation and subsequent trial is complete, or that an investigation is to be closed without charge, or prosecution is discontinued.

The discussion will consider any potential misconduct or gross misconduct by the staff member, and consider:

- the information provided by the police and children's social care
- the result of any investigation or trial; and
- the different standards of proof in disciplinary and criminal proceedings.

In the case of contractors, the LADO and the SD will work with the providing agency in deciding whether to continue using the person's services.

6.16 Record keeping

- The SD will keep a clear and comprehensive summary of the case record and provide a copy to the accused staff member. A copy of the record should also be given to the LADO.
- The record will include details of how the allegation was investigated and resolved and the decisions reached. It will be completed in collaboration with the LADO.
- Details of allegations that are found to be malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

6.17 References

- If the allegation was proven to be malicious, false, or unsubstantiated, it will not be included in any employer references.
- A history of repeated concerns or allegations which have all been found to be malicious, false, or unsubstantiated will also not be included in any references.

6.18 Notifying the Disclosure and Barring Service (DBS) or equivalent⁵

The LADO will discuss with the SD and the Finance and HR Manager whether NAS Media needs to refer the staff member to the DBS (or equivalent in devolved nations), if the allegation is substantiated and the person is dismissed or the charity ceases to use the person's services, or the person resigns or ceases to provide their services.

- There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child; or
- if there is reason to believe that they have committed one of a few listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009) and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.

⁵ For the devolved nations notify:

Wales - DBS

Scotland - Disclosure Scotland

Northern Ireland - AccessNI

6.19 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the SD, the Finance and HR Manager and the LADO should review the circumstances of the case to determine whether any improvements could be made to NAS Media's procedures or practice to help prevent similar incidents in future.

Additional considerations concerning online abuse images

6.19.1 What to do if a member of staff/consultant is inadvertently exposed to child sexual abuse images whilst using the internet:

- The URLs (webpage addresses) which contain the suspect images should be reported to the Internet Watch Foundation via www.iwf.org.uk – staff /consultants should refer to the DSO who will carry out the report. This is to avoid duplication – a key principle is that NAS Media must avoid sending actual copies of the images to the Internet Watch Foundation.
- Any copies that exist of the image, for example in emails, should be deleted.

6.19.2 What to do if abusive images of children are found on NAS Media devices:

- Staff must report what they have found to the DSO immediately
- The URLs (webpage addresses) which contain the suspect images should be reported on to the Internet Watch Foundation via www.iwf.org.uk by the DSO. Copies of the actual images must not be sent to the Internet Watch Foundation.
- DSO to contact the police regarding the images. If there is a doubt about whether the images are criminal, then a discussion will take place with the police regarding the best way for them to receive copies to determine whether they are criminal or not.
- Discuss with the police what to do about the device that the images are on.
- Quarantine the device in question and discuss with the police about checking for any other images on that device or any others.
- If any copies of images need to be stored at the request of the police, then they should be stored securely where no one else has access to them.
- Follow the allegations management procedures above in respect of who has been using the device.

7. Recording, record keeping, retention and destruction

7.1 Purpose

Good record keeping is an important part of our accountability and will help us in meeting our key responsibility to respond appropriately to safeguarding concerns or allegations. Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included this must be made clear. Where people are referred to, they should be identified clearly by role.

7.2 Storage

Safeguarding records will be held in a locked filing cabinet for paper and password protected with restricted access on Company servers.

7.3 The DSO and SD must:

- record all consultations and decision-making regarding a safeguarding concern or allegation
- create a stand-alone file if one does not exist and keep it updated.

7.4 Checklist for a good safeguarding record:

- Structured and easily accessible
- Legible
- Clear, concise and precise
- Writer's meaning clearly conveyed and writer's name is included
- Includes all relevant information
- Free from jargon and abbreviations
- Separates fact from opinion and hearsay
- Decisions reached are clearly recorded
- Dated and timed.

7.5 Records retention and destruction schedule

NAS Media keeps safeguarding records for 5 years.

In the case of safeguarding allegations, a summary will be placed in the staff member's personnel file and kept until the person reaches retirement age or for a period of 10 years from the date of the allegation, if that is longer.

7.6 Responsibility for the destruction of records lies with the SD.

8. Escalation

- 8.1** When NAS Media has made a referral out to either the police or social care and has followed it up, if NAS Media remain concerned then this can be escalated. Options include:
- a formal letter to the local authority laying out the concerns, or
 - In each local authority area, there is a Local Children's Safeguarding Partnership (formerly called Local Safeguarding Children Boards) who is responsible for writing interagency child protection procedures. These procedures will explain how a matter can be escalated. There is an equivalent for adult social care too and the procedures are devised by the Adult Safeguarding Board.
- 8.2** If any staff member or volunteer considers that the DSO has not taken appropriate action to address a concern raised, they should raise the matter with SD. If still dissatisfied there is the option contacting Protect or the NSPCC Whistleblowing helpline.

9. Working with third parties and partners

- 9.1** NAS Media often works with other partners to deliver an event. Whenever this work involves young people, there are safeguarding considerations to be addressed and the manager of the event is responsible for doing this. There is not a 'one size fits all' approach, rather thought needs to be given to:
- the potential risks and identifying where responsibility lies for mitigating the risks
 - agreement about whose safeguarding policies, procedures and code of conduct apply or how they interrelate e.g., for example if a venue has its own safeguarding policy and procedures.

Such considerations must be discussed and documented at the planning stages of any event be it online or in person. Advice and support with this can be sought from the SD or DSO.

- 9.2** Where an organisation is going to deliver an event on behalf of NAS Media, it is important we check that they have their own safeguarding arrangements in place as part of the due diligence process for contracting and agree the reporting procedures should a concern or allegation arise.

10. Use of Images Policy

10.1 Policy aims

The aim of this policy is to ensure that any images (still or moving) of children or young people taken or used for NAS Media purposes are done in a manner that safeguards them and protects their dignity. This is consistent with the aims of the NAS Media Safeguarding Policy.

The purpose of this policy is to:

- Protect young people who engage with NAS Media
- Provide staff with overarching principles that guide our approach to safeguarding young people and the use of their images.

10.2 Definitions

A child is defined in law as anyone under the age of 18.

The term 'use of images' for the purpose of this policy refers to any means of capturing images of children or young people, whether still, moving or live streaming, whether held in hard copy or digital format and where these may be used for commercial (used to sell a product, promote something, or raise money for a cause) or editorial (used to illustrate an article, story or educational text) purposes in order to further the aims of NAS Media's marketing activities.

Images of a person constitute 'personal data' and therefore data protection legislation and regulations apply. At the same time images provide valuable evidence of the work that NAS Media is doing and therefore 'tell a story' which is beyond the image of the individual.

10.3 Legal framework:

- Data Protection Act 2018
- General Data Protection Regulation 2018
- United Nations Convention on the Rights of the Child 1991

10.4 Policy statement

NAS Media takes and uses images of young people for a variety of purposes to fulfil its aims and objectives. Images may be captured by those working for, or on behalf of, NAS Media. These images may be used in print or online and retained both as hard copies or digitally.

Most occasions when people take photographs or film of young people are valid and do not provide any cause for concern. Unfortunately, there are occasions when this is not the case. A policy on the use of images is required because of the potential risks associated with photographing or filming young people:

- Young people may be identifiable and therefore could be traced by someone who intends to harm them in some way using facial recognition software. Contact may be made with a view to facilitate abuse or to bully/troll them because of their views;
- There may be direct and indirect risks when images are shared online or in print with personal information attached to them;
- There could be legal restrictions in place to prevent a young person from being identified to protect them e.g., if a child is in local authority care or if they have been adopted;
- The images may be inappropriate or undignified;
- Photos and film can be edited to create illegal content including child abuse images;
- Images may be collected and shared.

Given the potential harm that the misuse of images could bring to young people it is essential to minimise the risks by having appropriate safeguards in place.

The General Data Protection Regulation 2018 (GDPR) explicitly states that children's personal data merits specific protection because they may be less aware of the risks involved in using their data. The GDPR allows for the processing of personal data on the basis of consent:

- **The right to be informed** (articles 13 and 14). You must be clear about the context of how any images are going to be used.
- **The right to access** (article 15). Individuals have the right to access their personal data on request, and receive confirmation about how it's being used.
- **The right to erasure** (article 17). Individuals have the right to request their images be removed from websites, social media or future versions of printed materials.
- **The right to object** (article 21) Individuals have the right to object, on grounds relating to their situation, at any time to processing of personal data concerning them unless the data controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

10.5 Informing and gaining consent - individuals and small groups

When taking images of **individuals or small groups where people may be identified** it is essential to obtain explicit written consent of all those featured unless this is already obtained by the school or others. This includes taking photos or film of NAS Media staff. The best way to achieve this is via the Consent Form for Photography, Film and Interviews (**Appendix 12**). A parent or legal guardian must sign this. It should include clear information about how the images will be used and where, will they be shared with any other organisation, how long they will be retained for and who to contact if consent is being withdrawn.

We expect the following in terms of obtaining written consent:

- For those aged 0 – up to 13 years: a parent/guardian must consent (however, it is still important for them to check the child agrees to their image being taken and used)
- For those aged 13 - up to 18 years: a parent/guardian and the young person must consent

Consent will only be valid if it is freely and explicitly given, documented and you do not create or use images for any other purpose than the one for which consent was given. It is imperative that children and young people are not put under pressure by anyone from NAS Media or anyone else acting on our behalf to be photographed or filmed.

In schools. If you are working in schools or colleges and you want to take photographs or film then you must ensure that written consent has been obtained and have this confirmed in writing by the school or college prior to the visit taking place and before any photographs or films are taken and used. If the school offers to take photographs and pass them onto NAS Media then clarification must be sought from the school as to how the images or film can be used (this will depend on the terms contained within their own policy and release form) and that parental consent has already been granted.

At events. When schools are bringing groups of children to an event then we will ask them in advance about consent. The following wording to be included in our correspondence with them:

“Photography and filming take place at these events, should you have any students where permission has been removed, please let the NAS Media Team know and we will issue lanyards to confirm “No Photography or Filming”.

At live events NAS Media will put up signage so that those who do not wish to be photographed can opt out. the following signage will be on display

“Please note there may be filming and photography at NAS Media events. If you or your students do not wish to be photographed or filmed, please advise a member of the team”.

Managing those where there is no consent. Where consent has not been obtained there should be a system in place for identifying those not to be photographed or filmed for example by the wearing of a coloured spot or lanyard, a position which hides the face, moving out of view etc. This applies to work in schools or in person events. Signage at in person events should indicate that photographs or film may be taken and how a visitor can opt out of this. the following wording for this will be on display:

Withdrawal of consent. Anyone who consents to NAS Media taking their image in any form needs to be informed about how they can ask for that image to be destroyed and not included in any future publication. To do this they would need to contact the DSO who will then action this request. Of course, NAS Media cannot be responsible for how others use images once published and nor would we be able to give any guarantee that we can withdraw published images (particularly those in print) even if consent for them is subsequently withdrawn. We can however, confirm when we will stop using the image if consent is withdrawn.

10.6 Informing and gaining consent - crowd scenes

It is not necessary to gain consent from young people involved in a crowd scene where adults and children cannot be identified. Signage at the live event will indicate that photographs are being taken and what to do if they want to be excluded from this.

If you are filming events such as public events or even just people on the street then you must, if safe to do so, make every effort to make individuals aware of your presence and obtain consents. If this is not possible then please assess the risks of filming without consent and report back to your commissioner/lead on the shoot/line manager who will decide the level of risk and whether or not to use the content.

10.7 Taking and using images

NAS Media expects that in taking any images these best practice guidelines are followed by ourselves or commissioned photographer:

- Images should be taken which are respectful and dignified
- Only take and use images of young people in suitable clothing to reduce the risk of inappropriate use
- Consider if there are images in the background which could locate a young person or symbols they are wearing (e.g., school uniform) that might locate them
- It is safer not to put the young person's full name with the image or use only the first name. If it is thought necessary to use the full name with the image then consent must have been sought for this to happen. The same restrictions apply to tagging images posted online.
- Do not take images of young people engaged in private activities e.g., washing, bathing, dressing, getting changed etc.
- Do not take images of young people behaving recklessly or dangerously
- Do not take images of anyone who has been identified as 'not to be photographed'. They may be identifiable by a coloured lanyard or spot on their badge.

10.8 Capturing, editing and storage

Under the GDPR there needs to be a process that helps us to find and delete personal data (including photographs) at a later date and this is a part of managing NAS Media's digital assets. This requires us to have a system for labelling the content and being able to locate it should it be necessary.

Each Consent Form for Photography, Film and Interviews must be kept in a secure manner and password protected as this is personal data so its storage must comply with data protection requirements. Rather than store hard copies of the release form, these should be scanned electronically. It is best practice to keep the Photography and Filming Release forms separate from the images/film but with cross reference to it.

All photographs and films once taken on a NAS Media device should be uploaded to a NAS Media laptop or server and deleted from mobile devices. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones. Care should also be taken when images are being transported on any equipment or as hard copies.

All images and films need to be stored securely with restricted access to them so that no one can accidentally use them without being clear who they belong to and the context in which they may be used. Any printed photographs should be stored in a locked cabinet at a secure site with restricted access to them.

Digital photographs and film should be stored on the NAS Media's database (not hard drives or mobile devices) and only accessible by individuals with appropriate access rights.

10.9 Retention and Destruction

Photographs and film should be destroyed once used for the specified purpose. They can only be retained for the period specified in the Consent Form for Photography, Film and Interviews. Once the retention period has been reached then photographs or film should be destroyed/deleted unless further consent has been obtained to keep them for longer. The process for destroying photographs/film is as follows unless they are being retained for our organisational archive:

- Hard copies of photographs should be placed in confidential waste for destruction or shredded.
- Digital images should be deleted
- Photography or film of no use should be removed at source or in any copies when no longer needed.
- A record of destruction should be made wherever possible.

Responsibility for ensuring destruction happens lies with the SD.

10.10 Equipment

Images/film may be taken using a range of equipment including cameras, mobile phones, laptops and notebooks. Wherever it is possible, equipment owned by NAS Media must be used. If personal equipment has to be used then all photographs or film should be uploaded onto a NAS Media server or laptop. These images should not be stored on any mobile phones or shared with anyone other than for the purpose specified.

10.11 Existing images

If existing photographs (those taken before the date of this policy) are not going to be used for the purpose for which they were originally taken, the holder is responsible for endeavouring to contact the subject to gain consent for further use. Where there is uncertainty, a risk assessment should be undertaken specifically focusing on measurable harm and distress and a record made of any decision taken to use the images/film with a rationale.

10.12 Use of external photographer

There are times when we subcontract with a photographer to take photographs or film on behalf of NAS Media. In such instances, the contract must include our expectations about safeguarding young people as per this policy and our Safeguarding Code of Conduct and copyright arrangements.

10.13 Safeguarding concerns

If anyone has a concern about the taking and using of images and film that is inappropriate or harmful to young people then follow the NAS Media Safeguarding Policy and Procedures.

Appendix 1: Underpinning legislation and guidance

United Nations Convention on the Rights of the Child 1991

Protection of Children Act 1978

Children Act 1989 and 2004

Sexual Offences Act 2003

Female Genital Mutilation Act 2003

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Communications Act 2003

Malicious Communications Act 1988

Counter Terrorism and Security Act 2015

Serious Crime Act 2015

Modern Slavery Act 2015

Defamation Act 2013

Digital Economy Act 2017

Data Protection Act 2018, GDPR 2018

Privacy and Electronic Communications Regulations (PECR)

HM Government (2018 but updated 2020) Working Together to

Safeguard Children Voyeurism Act 2019

Communications Act 2003

Malicious Communications Act 1988

Social Services and Well-being (Wales) Act 2014,

Working Together to Safeguard People, Volume 1, 2014

Wales Accord on the Sharing of Personal Information (WASPI) 2013

Wales Safeguarding Procedures 2019

Well-being of Future Generations (Wales) Act 2015

Children and Young People (Scotland) Act 2014

National Guidance for Child Protection in Scotland (Scottish Government 2014)

Getting It Right for Every Child (Scottish Government 2015)

The Children (Northern Ireland) Order 1995

Co-operating to Safeguard Children and Young People in Northern Ireland 2017

Malicious Communications (Northern Ireland) Order 1988

Safeguarding Board Northern Ireland Core Policy and Procedures 2018

Criminal Law Act 1967

Appendix 2: Defining child abuse and neglect

There are four categories of harm⁶ although often children may suffer more than one type of harm.

1. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

2. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:

- not giving the child opportunities to express their views;
- deliberately silencing them, 'making fun' of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

3. Sexual abuse and exploitation involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child 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.
- non-contact activities, such as involving children 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 take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 years into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

4. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- protect a child from physical harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers);
- ensure access to appropriate medical care or treatment.

Neglect can also include neglect of, or unresponsiveness to, a child's basic emotional needs.

⁶ HM Government (2018) [Working together to safeguard children](#)

Appendix 3: Types and indicators of child abuse and neglect

Physical abuse Possible indicators are children who have: • frequent injuries • unexplained or unusual fractures or broken bones unexplained: bruises, cuts, burns, scalds, bite marks. • bruising in pre-mobile babies	Sexual Abuse and Exploitation Possible indicators of sexual abuse are children who: • display knowledge or interest in sexual acts inappropriate to their age • use sexual language or have sexual knowledge beyond their years ask others to behave sexually or play sexual games • self-harming behaviours • have problems with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy. Possible indicators of child sexual exploitation are children who: • appear with unexplained gifts or new possessions • associate with other young people involved in exploitation • have older boyfriends or girlfriends • suffer from sexually transmitted infections or become pregnant • suffer from changes in emotional well-being • misuse drugs and alcohol • go missing for periods of time or regularly come home late • regularly miss school or education
Emotional abuse Possible indicators are: • Children who are excessively withdrawn, fearful, or anxious about doing something wrong • Parents or carers who withdraw their attention • from their child, giving the child the 'cold shoulder' • Parents or carers always blaming their problems • on their child • Parents or carers who humiliate their child, for • example, by name-calling or making negative • comparisons.	Neglect Possible indicators are: • Children who are living in a home that is persistently dirty or unsafe • Children who are frequently left hungry or dirty • Children who are left without adequate clothing for the weather conditions • Children who are living in dangerous conditions, i.e., around drugs, alcohol or violence • Children who are often angry, aggressive or self-harm • Children who fail to receive basic health care • Parents who fail to seek medical treatment when their children are ill or are injured • Children who are left alone when they are young or left in the care of unsuitable adults or dangerous adults.

Appendix 4: Grooming behaviour

'Grooming' is the process through which a person attempts to befriend a child with the intention of later developing a sexual relationship with them. It involves making the child feel comfortable through a variety of methods thus developing trust, before initiating physical contact and abusing that trust. Some argue that the term *entrapment* or *control* better describes this process.

An offender is likely to look to groom the adults as well as the child to gain their trust. This process can happen within a family or within an institution or organisation. Those who sexually abuse children are often experts at gaining confidence and can look for situations where they can have unsupervised access to children. Signs that an individual may be grooming a child or young person include:

- Being dressed inappropriately around the child or young person
- Spends most of his/her spare time with children and has little interest in spending time with someone of his/her own age
- Giving special attention to a child or young person
- Isolating a child or young person from other people
- Hugging, touching, kissing, tickling, wrestling with or holding a child or young person
- Giving gifts (including cigarettes/alcohol/drugs) or money for no apparent reason
- Treating a child as an equal/peer or like a spouse
- Finding ways to be alone with a child or young person when other adults are not likely to interrupt, e.g., taking the child for a car ride, arranging a special trip, etc.
- Not respecting the privacy of a child or young person
- Discussing their own sex life or asking a child or young person to discuss sexual experiences or feelings;
- Viewing abusive images of children
- Abusing alcohol or drugs or encourages children or young people to use them. The use of such substances reduces inhibitions.
- Allowing children or young people to consistently 'get away' with inappropriate behaviors
- Encouraging silence or secrets
- Makes fun of a child's body parts – uses sexualised names for the child or young person
- Not adhering to the rules, authority or code of conduct in the setting, organisation or within an activity

Appendix 5: Additional guidance on children and young people abused in specific circumstances

Abuse by peers. Young people, particularly those living away from home, are vulnerable to physical, sexual and emotional bullying and abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult. It is subject to the same safeguarding children procedures as apply in respect of any young person who is suffering or at risk of suffering significant harm from an adverse source. A significant proportion of sexual offences are committed by teenagers. Staff should not dismiss some abusive sexual behaviour as “normal” between young people.

Bullying behaviour can be described as follows:

- deliberately causes hurt (either physically or emotionally)
- repetitive (though one-off incidents such as the posting of an image on the internet, or the sending of a text or sexting (sexually explicit photographs or messages) which is then forwarded to a group, can quickly become repetitive and spiral into bullying behaviour); and
- involves an imbalance of power (the person on the receiving end feels like they cannot defend themselves).
- Bullying is not:
 - teasing and banter between friends without intention to cause hurt
 - falling out between friends after a quarrel or disagreement; or
 - behaviour that all parties have consented to and enjoy (though this needs to be carefully monitored as coercion can be very subtle)

Bullying can take the following forms:

- emotional – being unfriendly, ignoring someone, not involving them in activities, sending hurtful or tormenting texts, humiliating or ridiculing someone
- physical – pushing, kicking, hitting, punching or pinching or any use of violence
- racist – racial taunts, graffiti or gestures
- related to a disability – because of how somebody looks or presents related to their disabilities (children with disabilities are more likely than their non-disabled peers to be excluded from activities)
- sexual – unwanted physical contact or sexually abusive comments (sexual bullying can also relate to gender and gender identity and includes those who do not fit with the gender role prescribed to them)
- homophobic – because of, or focusing, on the issue of a young person’s actual or perceived sexual orientation; or
- verbal (in the case of children with hearing disabilities this can take place in sign language) – name calling, sarcasm, spreading rumours or teasing.

Child abuse linked to belief in “spirit possession” or “witchcraft”. The belief in “possession” and “witchcraft” is widespread in some communities. It is not confined to particular countries, cultures or religions. The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but young people involved can suffer damage to their physical and mental health, capacity to learn, ability to form relationships and self-esteem due to extreme physical and emotional abuse that may be wrongly justified on the basis of spirit possession or witchcraft.

Child abuse and social Media. The internet has become a significant tool in the distribution of abusive images of children. Social Media is used as a means of contacting young people with a view to grooming them for inappropriate or abusive relationships. Contacts made initially in a chat room can be carried on via email, instant messaging services, mobile phones or text messaging. Cyberbullying, including sexting (which is illegal), is now widespread and can be very harmful to young people. Further advice and guidance on this topic are on the websites of the NSPCC, CEOP, Internet Watch Foundation and the UK Safer Internet Centre.

Children and families who go missing. Local agencies and professionals should bear in mind, when working with young people and families where there are outstanding concerns about the young person’s safety and

welfare that a series of missed appointments may mean the family have moved. Young people who are looked after (i.e., in care) sometimes go missing from their placements. There will be procedures in place, which should be followed if this occurs and the care home/foster placement must be immediately informed.

Child trafficking. Child trafficking is child abuse. This is where children are recruited, moved or transported and then exploited e.g., for sexual exploitation or domestic servitude. They are often subject to multiple forms of abuse. Children may be trafficked into the UK from abroad but can also be trafficked from one part of the UK to another.

Child on Parent Violence (CPV) or Adolescent to Parent Violence and Abuse (APVA) is any behaviour used by a young person to control, dominate or coerce parents. It is intended to threaten and intimidate and puts family safety at risk. Whilst it is normal for adolescents to demonstrate healthy anger, conflict and frustration drawing their transition from childhood to adulthood, anger should not be confused with violence. Violence is about a range of behaviours including non-physical acts aimed at achieving ongoing control over another person by instilling fear.

Most abused parents have difficulty admitting even to themselves that their child is abusive. They feel ashamed, disappointed and humiliated and blame themselves for the situation, which has led to this imbalance of power. There is also an element of denial where parents convince themselves that their son or daughter's behaviour is part of normal adolescent conduct.

Child criminal exploitation. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur using technology.

County Lines. This term is used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Disabled children. Children with a disability or additional health needs are a particularly vulnerable group as signs of abuse and neglect may be masked or misinterpreted as being due to underlying impairments. Disabled young people are three times more likely than non-disabled children to experience abuse due to several factors:

- have fewer outside contacts than other young people;
- may receive personal care, possibly from several carers, which may both increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries;
- have an impaired capacity to resist or avoid abuse;
- have communication difficulties that may make it difficult to tell others what is happening or to be believed;
- be inhibited about complaining because of a fear of losing services;
- be especially vulnerable to bullying and intimidation and /or, abuse by their peers.

Domestic violence and abuse are any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to these harms:

- psychological
- physical
- sexual
- financial
- emotional

Controlling behaviour is a range of acts designed to make a person subordinate or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

Children and young people living in families where they are exposed to domestic violence have been shown to be at risk of behavioural, emotional, physical and long-term developmental problems. Everyone working with young people and families should be alert to the frequent inter-relationship between domestic violence and the abuse and neglect of young people.

Families living in temporary accommodation. Living in temporary accommodation, often at a distance from previous support networks, can lead to young people and families falling through the net and becoming disengaged from services. Where there are concerns about a young person in temporary accommodation, safeguarding procedures should be followed.

Female genital mutilation (FGM). (also known as ‘female genital cutting’ or ‘female circumcision’.) Communities tend to use local names for referring to this practice including “sunna”. FGM-practicing families do not see it as an act of abuse; however, FGM has significant physical and mental health consequences both in the short and long term and, therefore, must not be excused, condoned or accepted. FGM cannot be left to personal preference or cultural custom as it is an extremely harmful practice that violates basic human rights. Girls are at risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. FGM is illegal in the UK and where it is suspected it must be referred onto children’s social care.

Forced marriage. A forced marriage is where one or both people do not (or in cases of people with learning difficulties or who are under-age, cannot) consent to the marriage and where duress is used to enforce the marriage. ‘Duress’ includes psychological, sexual, financial or emotional pressure and physical violence.

Forced marriage is a violation of human rights and is seen in the UK as a form of domestic violence or child abuse. It may affect girls, boys, women and men from any community or background. However, existing statistics show that greater numbers of women are affected.

Forcing someone to marry without their consent is a criminal offence. It is illegal to take someone overseas to force them to marry (whether or not the forced marriage takes place) or to marry someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not).

A forced marriage is entirely different from an arranged marriage, and the two should not be confused. In an arranged or assisted marriage, the families take a role in choosing and introducing the marriage partners but the marriage is entered freely by both people, without pressure. In a forced marriage, this consent does not exist. If this form of harm is suspected, advice should be sought from the Forced Marriage Unit prior to any discussion with the young person or family on 0207 008 0151 or out of office hours contact: 0207 008 1500 (ask for Global Response Centre).

Parental adversity. Parental drug misuse can cause harm from conception to adulthood, including physical and emotional abuse and neglect. Where drug misuse co exists with domestic violence and mental illness the risk of harm to a child is even greater.

Race and racism. Young people from black and minority ethnic groups may have experienced harassment, racial discrimination and institutional racism. The experience of racism is likely to affect the responses of the young person and parents/carers to other intervention in their lives. There is also a danger that professionals working with children and young people may not intervene soon enough for fear of being seen as racist and in so doing, offer the child less protection.

Unaccompanied asylum-seeking children (UASC). A UASC is an asylum-seeking child under the age of 18 who is not living with their parent, relative or guardian in the UK. They can be more vulnerable to abuse and exploitation because they lack the necessary support networks, protection and communication skills.

Adolescent risks. The nature of abuse and neglect for teenagers is different from that of younger children. Behaviours by parents/adults that might be deemed abusive or neglectful for a very young child may be considered appropriate for teenagers. Additionally, they may face a wider range of risks due to the relationships they have, social Media that they use, lifestyles that they lead and with their increasing independence. Risk taking and experimentation is a normal part of growing up but also can place young people in harm's way.

Young people whose behaviour indicates a lack of parental control. When young people are brought to the attention of the police or wider community because of their behaviour, this may be an indication of vulnerability, poor supervision, abuse or neglect in its wider sense. It is important to consider whether these are young people in need of protection as well as support services and not to view them as only an offender as they may well be also victims themselves.

Young people and gang activity. Overall, young people can be particularly vulnerable to suffering harm in the gang context are those who are:

- not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe;
- not involved in gangs, but at risk of becoming victims of gangs;
- not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; *or*
- gang-involved and at risk of harm through their gang-related activities e.g., drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members.

Young carers. A young carer is a person under 18 who provides or intends to provide care for another person (of any age except for where that care is provided for payment or as voluntary work). Young carers may require support services either for them or for the person they care for to ensure that their health and welfare does not suffer. In some instances, young carers may also need protection due to the adverse circumstances they may be experiencing or where the behaviour of the person that they are caring for is abusive.

Radicalisation and violent extremism. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Government in the 2011 Prevent Strategy as: *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.* It also includes calls for death of members of the armed forces, whether in this country or overseas.

Children or adults may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals. Indicators of radicalisation and violent extremism may include:

- showing sympathy for extremist causes
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations;
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- possessing illegal or extremist literature
- out of character changes in dress, behaviour and peer relationships secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- verbalising anti-Western or anti-British views

Appendix 6: Types and indicators of adult abuse and neglect

The Care Act 2014 recognises ten categories of abuse that may be experienced by adults:

Physical abuse • Hitting • Slapping • Pushing • misuse of medication • restraint • inappropriate sanctions	Domestic abuse • psychological • physical • sexual • financial • emotional abuse • so-called 'honour' based violence • coercive and controlling behaviour
Sexual abuse • rape • indecent exposure • sexual harassment • inappropriate looking or touching • sexual teasing or innuendo • sexual photography • subjection to pornography or witnessing sexual acts • indecent exposure • sexual assault • sexual acts to which the adult has not consented or was pressurised into consenting	Emotional or Psychological abuse • emotional abuse • threats of harm or abandonment or deprivation of contact • humiliation • blaming • controlling • intimidation • coercion • harassment • verbal abuse • cyber bullying • isolation • withdrawal of services/support
Financial or material abuse • theft • fraud • internet scamming • coercion in relation to an adult's financial affairs or arrangements, e.g., regarding wills, property, inheritance or financial transactions • the misuse or misappropriation of property, possessions, or benefits	Modern slavery • slavery • human trafficking • forced labour and domestic servitude whereby traffickers and slave masters use whatever means they have to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment e.g., passports withheld, imprisonment, withholding wages and/or food, threats of harm to person/family
Discriminatory abuse • harassment • slurs or similar treatment because of a person's race, gender and gender identity, age, disability, sexual orientation, religion	Organisational abuse This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or the care provided in one's own home. It involves one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice
Neglect • ignoring medical, emotional or physical care needs • failure to provide access to appropriate health, care and support or educational services • withholding of the necessities of life, such as medication, adequate nutrition and heating	Self-neglect • neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Incidents of abuse may be one-off or multiple. Repeated instances of poor care may be an indication of more serious problems including organisational abuse

Four additional types of harm that are relevant to safeguarding adults but not included in the Care Act 2014:

Cyber bullying This is where someone repeatedly bullies someone else through emails or texts or online forums.	Mate crime When vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. This can result in serious harm or even murder by people who purported to be their friend.
Forced marriage Where one or both partners are married without their consent or against their will. Forced marriage is a criminal offence	Radicalisation The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable people to the legitimacy of a cause. It may seek to involve them in committing violent offences.

Appendix 7: Safeguarding Contacts

Name and job title	Safeguarding Role	Contact details
Simon Bennie	Safeguarding Director (SD)	Simon Bennie simon@nasevents.co.uk 0208 167 4469
Meg Kanka	Designated Safeguarding Officer (DSO)	Meg Kanka meg@nasevents.co.uk 0208 159 2414
Police		999 in an emergency
Local authority Children's Social Care (England)	Use the following website to find out the details of who to report to https://www.gov.uk/report-child-abuse-to-local-council	
NSPCC Helpline	Helpline for advice on child protection matters for professionals and adults. It can make referrals to the police and children's social care	0808 800 5000
ChildLine	24-hour helpline for children and young people	0800 1111
The Mix	Free, confidential advice service for young people under 25 via online, social and mobile Media	0808 808 4994
Whistle blowing advice line (external)	Advice can be sought from NSPCC	0800 028 0285
Professionals Online safety helpline (POSH)	Advice for professionals about online safeguarding concerns	0344 381 4772 helpline@saferinternet.org.uk
National Crime Agency's Child Exploitation and Online Protection Centre (CEOP) Command	Advise and can investigate inappropriate online behaviour such as grooming online or sexual exploitation	0870 000 3344
Internet Watch Foundation (IWF)	Removes child sexual abuse images or video and non -photographic child sexual abuse images (e.g., cartoons or computer generated)	01223 203030 Or report online to: report.iwf.org.uk
Police Counter Terrorism Internet Referral Unit	To report online materials terrorism promoting terrorism or extremism	www.gov.uk

Disclosure and Barring Service (DBS)	Advice line for criminal records checks and barring in England and Wales	03000 200 190
Disclosure Scotland	Advice line for criminal records checks and barring in Scotland	0300 020 0040
NAPAC (National Association for People Abused in Childhood)	Support for adult survivors of child abuse, their friends and family	Tel 0808 801 0331 Email support@napac.org.uk
National Domestic Abuse Helpline	24-hour advice line	Tel 0808 2000 247
Victim support	For victims of crime	Tel 0808 168 9111 www.victimsupport.org.uk

Appendix 8: NAS Media Safeguarding Report Form

- Enter as much detail as possible.
- Don't delay making a referral if there is information missing.

Part 1 Details of the young person		
Name of young person		
Gender:	Age:	Date of Birth:
Religion	Ethnicity	Any additional needs (e.g., disability)
Parent/Carer name(s):		
Home address of young person:		
School, college, university:		
Part 2 Details of a safeguarding allegation against employees/volunteers/ third parties		
Name and role of person who is the subject of the allegation		
Age and/or Date of Birth		
Home address		
Place/time/date where the concern was identified		

Part 3 Your Details:		
Your Name:	Your Position:	Your contact details
Part 4 Report:		
Are you reporting your own concerns or responding to concerns raised by someone else?		
☐ Responding to my own concerns ☐ Responding to concerns raised by someone else	If responding to concerns raised by someone else, please provide their name, role and contact details (if known):	

Please provide details of the safeguarding concern or allegation including times, dates or other relevant information. Make it clear whether you are giving a fact, expressing your opinion or expressing the opinion of someone else.
The young person's or adult's account of what happened (e.g., of any incident, injury, disclosure, behaviour) if known
Please provide details of the person alleged to have caused the incident/injury if known (e.g., names(s) /address/ incident address /relationship to the young person

Please provide details (name, role contact details if known) of any witnesses to the incident/concerns:

Part 5: Actions Taken	
State any risk of immediate harm	
Identify any action taken already	
Is the young person and parents/carers or accused person aware that a report has been made	
Any known previous records of safeguarding concerns or allegations	
Any further information or comments or actions to be taken	

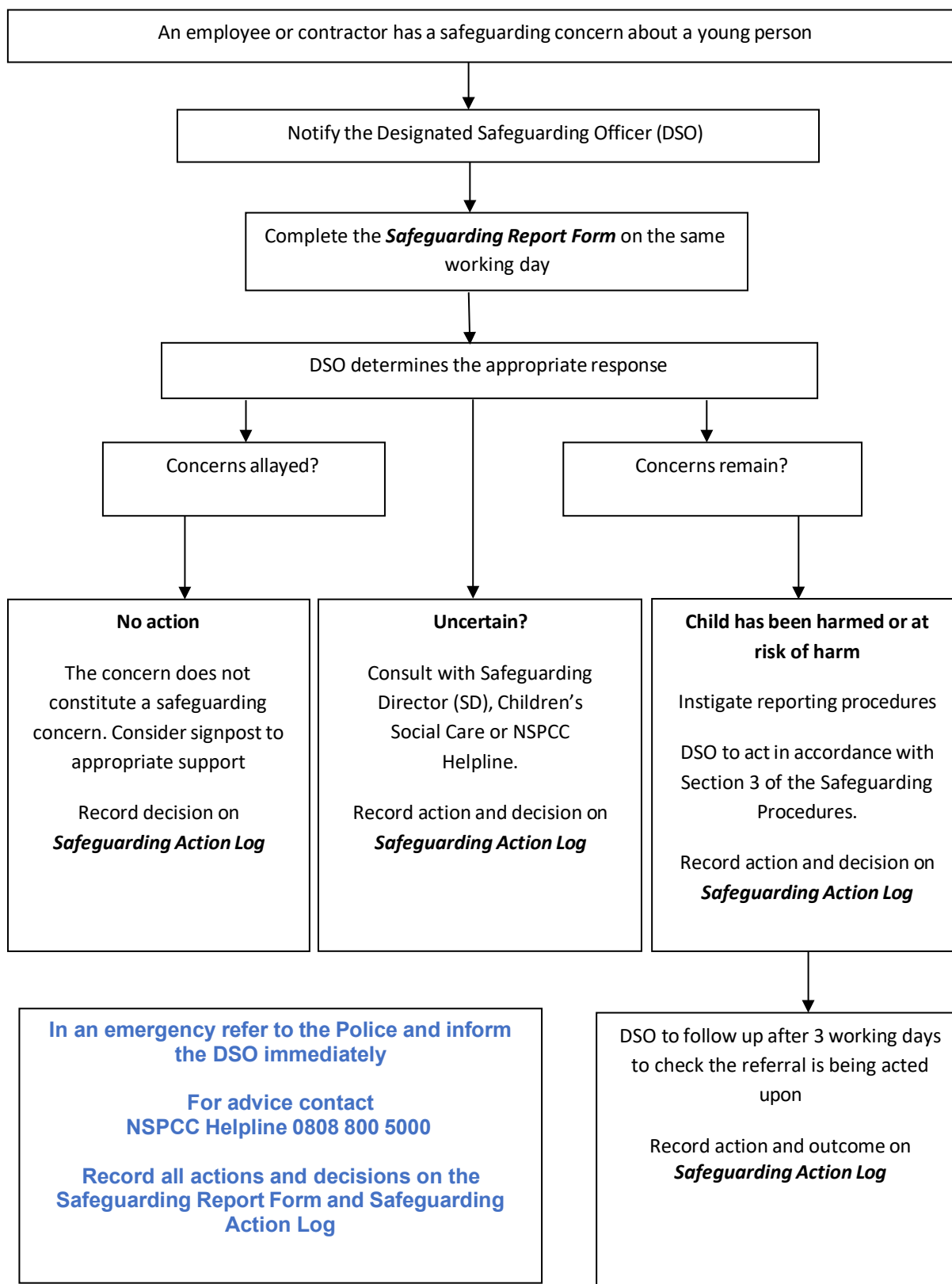
Date and time of report being submitted and to whom.....

Part 6: Immediate action and decisions by DCSO

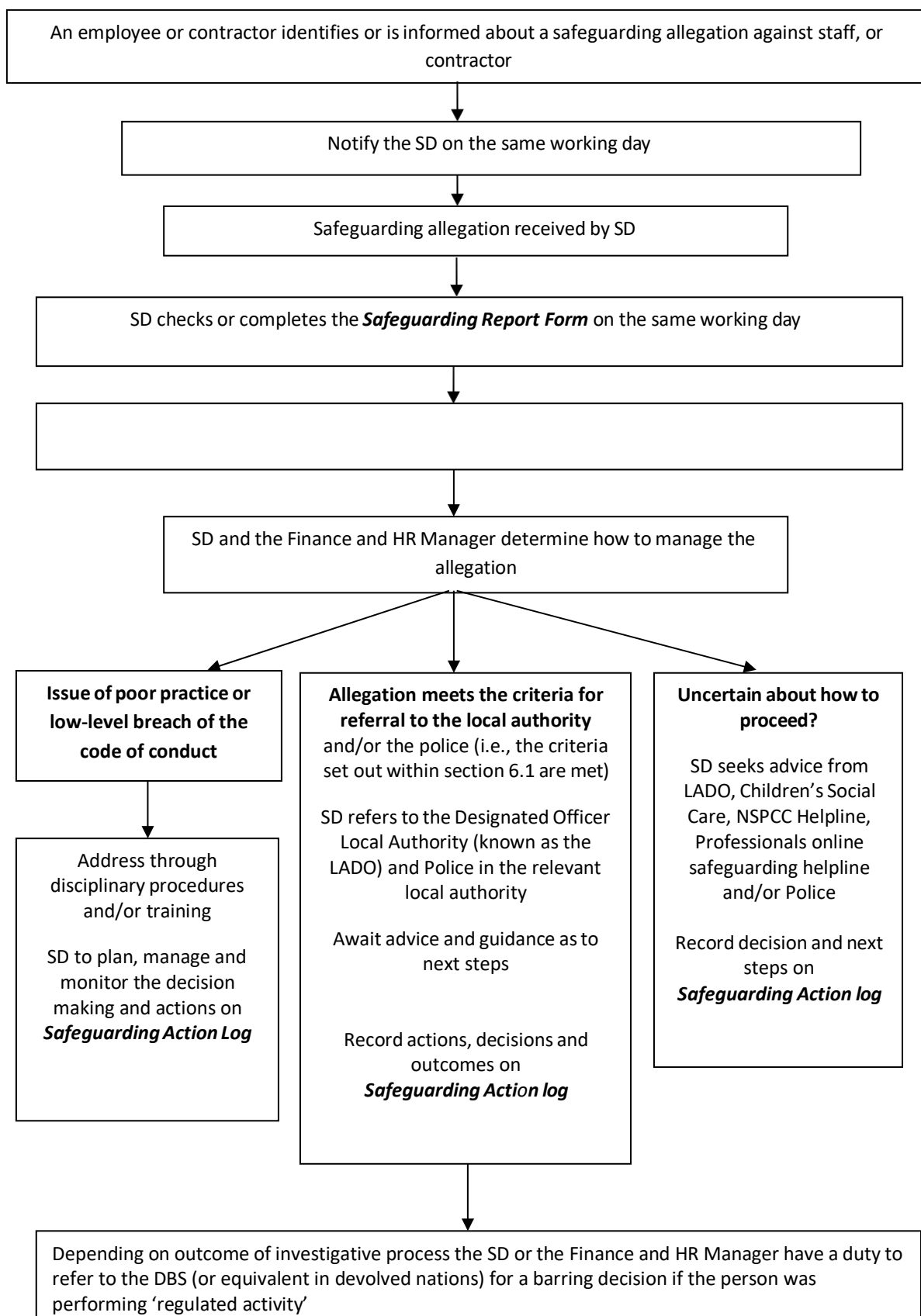
Appendix 9: NAS Media Safeguarding Action Log

Date & time	Name	Notes	Action	By Whom

Appendix 10: Flowchart: Responding to a safeguarding concern



Appendix 11: Flowchart: Responding to a safeguarding allegation tbc



Appendix 12: Photography and Film Consent Form for Under 18s

Event/activity	[add title]
Date	[add date]
Purpose for taking photographs or film	[add details]
Photographs/film will be published in these ways	[add detail]
Photographs or film will be stored for	[add number of years]

NAS Media Ltd wishes to take, use and store photographs or films of children and young people under the age of 18 years as detailed above. However, we will only do this if we have obtained written permission from a parent or guardian and from any young person aged 16 years and upwards.

We will process and store any photographs or film of your child safely and securely.

We appreciate that not everyone will want to be photographed or filmed and we will ensure that this does not exclude anyone from participating in our events or activities.

Please turnover to complete your details and sign if you give us your permission.

If you wish to withdraw your permission at any future point or if you have any questions then please contact Meg Kanka or Simon Bennie.

To find out more about our safeguarding policy and procedures contact Meg Kanka or Simon Bennie.

Please complete the boxes below if you give your permission:

Full name of child	
Date of Birth	
Address	
Contact Telephone Number (if applicable)	

Parent/Guardian information

Parent/Guardian's Name	
Parent/Guardian's email address/contact number	

Consent

Please indicate your response to these questions

I give my permission for the above-named child to be photographed as outlined in this form. YES/NO

I give my permission for the above-named child to be filmed as outlined in this form. YES/NO

I give permission for my child's name and age to be published with the photograph/film YES/NO

I understand that by signing this form that NAS Media Ltd is obliged to keep a copy of it to comply with our wishes and data protection law.

For child

Please sign here if you agree to being photographed or filmed*	
Date	

***this must be signed by the young person if they are aged 16 years and above**

For the parent/guardian

Please sign & note your relationship to the child/young person	
Date	