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UKfilmNet Safeguarding Policy

Associated Documents	UKfilmNet Risk assessment policy
	UKfilmNet Potentially Vulnerable Individuals Policy
	DBS Policy

1.0 SCOPE AND PURPOSE

- 1.1 UKfilmNet is committed to safeguarding children, young people and vulnerable adults in so far as they are engaged in organisation-related activities and services.
- 1.2 This policy and procedure sets out UKfilmNet's approach to preventing and reducing harm to children and vulnerable adults when they are in contact with any member of the UKfilmNet community including staff, participants, contractors and volunteers. It also highlights the procedure that staff should follow if they suspect a child, young person or vulnerable adult is experiencing, or at risk of experiencing, harm.
- 1.3 The policy aims to:
- Promote and prioritise the safety and wellbeing of children and vulnerable adults;
 - Provide assurance to parents, carers, UKfilmNet's charitable stakeholders and other parties that UKfilmNet takes reasonable steps to manage risks and keep children and vulnerable adults safe;
 - Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters;
 - Prevent the employment of individuals in work with children and/or vulnerable adults where they have been barred by the Disclosure & Barring Service (DBS) or are deemed by UKfilmNet to pose an unacceptable risk to vulnerable groups;
 - Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or vulnerable adults arising from contact with organisational staff, participants or volunteers, whether the harm has taken place on organisational premises or not.
- 1.4 UKfilmNet recognises the importance of ensuring that parents or guardians are fully aware of the activities and risks that their children may encounter in organisational activities. Except where the young person concerned is a participant or an employee of UKfilmNet, either parental consent or consent from the school will always be obtained before UKfilmNet undertakes an organised activity involving children whether on or away from organisational premises.
- 1.5 UKfilmNet cannot accept responsibility for ensuring the welfare of children and young people under the age of 18 who are present on organisational premises without its knowledge or consent. Therefore, parents, guardians, schools or groups who bring their children onto UKfilmNet properties or events must take responsibility for their safety and welfare and ensure that their children do not disturb others or damage organisational property. (See information in the UKfilmNet Potentially Vulnerable Individuals Policy)

- 1.6 The policy and procedures applies to all members of the UKfilmNet community including staff, participants, contractors and volunteers who may be working with children (i.e. those aged under 16), young persons (i.e. those aged 16 to 18) and vulnerable adults whom UKfilmNet encounters through its teaching, professional practice and research activities as well as through its outreach programmes.

2.0 KEY RESPONSIBILITIES

- 2.1 Overall responsibility for Safeguarding lies with the UKfilmNet leadership team. Issues can be raised via direct contact or in writing to safeguarding@ukfilmnet.org
- 2.2 It is the responsibility of the Social Services and/or the Police to investigate safeguarding concerns; however, UKfilmNet will undertake a risk assessment of any reports of possible safeguarding concerns before making a referral to such an external agency.
- 2.3 Where face to face contact occurs, UKfilmNet run events staff will be responsible for ensuring that the actions included in this policy are followed for participants under 18 enrolled on UKfilmNet programmes.
- 2.4 The Director of UKfilmNet is responsible for communicating with staff whose duties are classified as regulated activity with children and for ensuring that Disclosure and Barring Service (DBS) checks are carried out for relevant staff.
- 2.8 All staff are responsible for ensuring they follow the guidance in the Potentially Vulnerable Groups policy in addition to UKfilmNet's stated position with regard to children on campus.
- 2.9 UKfilmNet events organisers are responsible for providing advice on any risk assessment process for under 18 participants and other vulnerable groups on location.
- 2.10 The leadership team is responsible for ensuring that appropriate ethical approval is in place for dealing with children and young people when considering research proposals.
- 2.12 All staff and volunteers are responsible for reporting concerns of abuse and/or harm through the relevant channels as laid out in Section 8

3.0 DEFINITIONS

3.1 Throughout this policy and procedures the following definitions are used

a) Vulnerable

A situation where a child or adult is at risk of exploitation, harm or abuse, including the risk of radicalisation. While the definition of “vulnerable adult” and “child” are set out below, a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation.

b) Vulnerable Adult

A person over 18 who is, or may be in need of, community care or health care services by reason of mental or other disability or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation (including risk of radicalisation or being drawn into terrorism).

c) Child

A person who is under the age of 18. Those aged 16 to 18 are generally referred to as ‘young people’ rather than ‘children’ UKfilmNet that does not impact on their status for the purposes of this Policy.

d) Vulnerable Group

The generic term that includes Children and Vulnerable adults

e) Abuse

abuse under the policy on safeguarding vulnerable groups includes:

- physical abuse, including hitting, slapping, pushing, kicking, or inappropriate sanctions;
- sexual abuse, including encouraging relevant individuals to look at pornography, harassing them by making sexual suggestions or comments, or sexual acts where the individual has not consented, or could not consent or was pressured into consenting ;
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and
- financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- discriminatory abuse, including racist, sexist, that is based on a person’s disability, and other forms of harassment, slurs or similar treatment.
- Exploitation including encouraging others to engage in acts of terrorism

4.0 POTENTIAL AREAS OF RISK

4.1 Examples of areas where UKfilmNet may have contact with children and adults who may be vulnerable may include (this is not an exhaustive list):

- Teaching, supervision and support of participants;

- Summer schools, school visits, and other events such as work experience;
- Outreach or widening participation activities taking place on or off site
- Research subjects;
- Attendance at private functions run by UKfilmNet;
- Events and Conferences;
- On placements and in other professional and production settings;
- Field trips, excursions & other activities such as volunteering and other social activities;
- The activities of participants societies and networks

4.2 Specific areas of activity, for example practical workshops, have specific risk assessment procedures designed to promote safeguarding practices.

4.3 Where there is a higher risk of a safeguarding issue arising, e.g. outreach work or field trips involving children or vulnerable adults, a risk assessment should be completed in advance.

5.0 GUIDELINES ON RISK ASSESSMENT IN RELATION TO SAFEGUARDING VULNERABLE GROUPS

5.1 Before embarking on any organisational activity that may involve staff or participants (whether acting in a paid or unpaid capacity) working with members of a vulnerable group, it is advisable for a risk assessment to be conducted, part of which should cover safeguarding issues. The member of staff responsible for the activity should undertake the risk assessment which, as well as identifying risks to be mitigated or removed, also provides an opportunity to consider and identify alternative working practices. There are no fixed rules on how a risk assessment should be carried out, although the following general principles should apply:

- a) A risk assessment is a careful examination of what, in your area of work, could cause harm to people so that you can assess whether you have taken enough precautions or should do more to prevent harm. Where appropriate, this process should include consideration of any risks that may occur involving vulnerable groups, both within UKfilmNet and in settings outside UKfilmNet, such as placements, field trips, summer schools, or open days where members of a vulnerable group are in our care.
- b) Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups. This is designed to help you identify the context within which the risks should be managed. Identifying the different types of contact that staff or participants may have with these groups should lead to consideration of where you might seek to minimise occasions where a single adult is in the company of a lone child, or adult in a vulnerable situation and where there is little or no possibility of the activity being supervised or observed by others. For this purpose, the terms 'frequently' and 'intensively' relate to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.
- c) Identify any potential risk areas and detail action to prevent the risk occurring. Once you have identified the risks you should consider how they might be mitigated or removed. For example, situations where there is only one member of staff or any participants present with a lone child or adult in a vulnerable situation should be avoided where practicable. This part of the process may involve consideration of alternative working practice. For example, on occasions when a confidential interview or one to one meeting is necessary, it should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open. Meetings with any participants or employee under the age of 18

outside the normal teaching or working environment of UKfilmNet should be avoided. Where such meetings cannot be avoided, another staff member should be informed that they are taking place and wherever possible ensure that more than one adult is present.

- d) Identify any situations where a Disclosure and Barring Scheme (DBS) check might be required. This would apply to staff or participants where their normal duties fall within the definition of Regulated Activity or are listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended) or the Police Act 1997 (Criminal Records) (Registration) Regulations 2006. The definition of “normal” in this instance is in accordance with the standard dictionary definition (or variations thereof), which is “usual, regular or typical”. Therefore positions that have incidental/irregular contact with children or scenarios where an individual has incidental or indirect contact not related to a position of employment do not give rise to eligibility for DBS checks. Decisions in relation to who should be subject to a DBS disclosure should be undertaken as part of the DBS Assessment process, taking into account the exact nature of the employee’s duties, where they work and the degree of contact that they have with any persons (including participants) under the age of eighteen years or any adults in a vulnerable situation. Additional guidance on DBS checks can be accessed in UKfilmNet’s Recruitment & Selection Procedures.

6.0 DISCLOSURE & BARRING SERVICE CHECKS (DBS)

- 6.1 UKfilmNet has processes in place to check the suitability of staff and participants whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. UKfilmNet is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate.
- 6.2 Where agency workers supplied by a third party are involved, then UKfilmNet will require the third party to undertake the necessary checks on the worker (where the role requires satisfactory clearance).
- 6.3 Where contractors are engaged on organisational Terms of Business, any requirement in respect of undertaking and verifying any necessary checks will be contained within the Agreement Letter.
- 6.4 Individual event co-ordinators organised by UKfilmNet are responsible for managing participant vetting.
- 6.5 All organisational Faculties and Professional Services handling DBS disclosure information are committed to storing and handling it securely in line with the Data Protection Act and the DBS Code of Practice. Where this relates to Staff Disclosures, information will be stored, handled and retained in accordance with the requirements of the UKfilmNet DBS policy.

7.0 SAFEGUARDING ISSUES ARISING IN A PRODUCTION / WORKPLACE SETTING

7.1 UKfilmNet staff, participants and volunteers may come into contact with children or vulnerable adults whilst undertaking a professional or workplace placement or volunteering.

Where a concern arises in such a setting the member of staff or participants should normally report any safeguarding concern in the first instance to the UKfilmNet leadership team.

8.0 PROCEDURE FOR RAISING CONCERNS

8.1 The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect staff, participants and volunteers from false or unfounded accusations. Examples of the type of situations which may result in UKfilmNet implementing this policy and procedure may include where:

- a child or adult raises an allegation of abuse, harm or other inappropriate behaviour;
- a participants or staff member discloses information involving themselves or family members which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals;
- there are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation). The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member's responsibility to decide whether a child or adult has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have;
- there are observable changes in a child or adult's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation)
- a child or vulnerable adult becomes unduly distressed or angry
- a concern is raised that an individual presents a risk of abuse or harm towards a child or adult in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material. If there is concern that a member of staff or participants may present such a risk, UKfilmNet will invoke its risk assessment procedure (see section 5 above) and/or take action under another relevant policy
- Concerns arise that a participant or member of staff is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

8.2 UKfilmNet will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly.

8.3 It is the remit of Social Services and/or the Police to investigate safeguarding concerns; however UKfilmNet will undertake a risk assessment before making a referral to such an external agency. If a member of UKfilmNet, staff or participant, has any immediate risk concerns (including outside normal organisational hours) they may refer directly to the Police or Social Services, but otherwise they should follow the internal referral process set out below.

- 8.4 All issues of concern should normally be raised with the UKfilmNet leadership team. If the concern has been identified by participants engaged with outreach activities, it may be more appropriate for the concern to initially be raised with the UKfilmNet project / event coordinator of the relevant event where contact is taking place.
- 8.5 The leadership team will conduct a risk assessment and determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.
- 8.6 If the leadership team deems the risk such that the issue should be raised externally they will be the main point of contact for the relevant external agency(ies)
- 8.7 Any persons who are involved in a disclosure of any kind may feel that they need to speak to a professional for reassurance. The NSPCC operate a 24 hour help line for anyone concerned about a child or young person. It is primarily for use by adults and can be used anonymously: 0800 800600

9.0 EMPLOYING STAFF WHO FALL INTO THE VULNERABLE GROUP CATEGORY

- 9.1 There are a number of restrictions affecting the employment of children and young people (i.e. those under 18 years of age), mostly relating to health and safety, working hours and training. This includes anyone on a work experience placement at UKfilmNet.
- 9.2 It is the general policy of UKfilmNet to ensure that all employees and others who may be potentially vulnerable (e.g. due to their age, declared disability or condition, or sexual orientation) are given an appropriate level of support so that they are not harmed by being in our working environment. Please refer to UKfilmNet's Potentially Vulnerable Groups Policy.
- 9.3 Under the Employment Rights Act, an employee aged 16 or 17 has a right to take time off work for study or training which leads to a relevant qualification. The amount of time that may be taken is that which is reasonable, taking into account the nature of the training or study and the needs of the employer.
- 9.4 The [Working Time Regulations 1998](#) sets out the working hours and rest breaks for young people employed as workers Under the Management of Health and Safety at Work Regulations 1999, employers must ensure that young persons are protected at work from any risks to their health or safety because of their age and inexperience, and must not be given work, which is beyond their physical or psychological capacity. Before young persons start work the employer must carry out a risk assessment to include:
- Their inexperience, their absence of awareness of existing or potential risks, and their immaturity
 - The fitting out and layout of the workplace and the workstation
 - The nature, degree and duration of exposure to physical, biological and chemical agents
 - The form, range and use of work equipment and the way in which it is handled
 - The organisation of processes and activities
 - The extent of the health and safety training provided

10.0 ACTION BY UKFILMNET

- 10.1 UKfilmNet reserves the right to take action under its disciplinary procedures should it later receive information that suggests that its conduct standards may have been breached. Staff or participants who are dismissed from UKfilmNet as a result of safeguarding concerns will be reported to the Disclosure and Barring Service and any relevant professional body.
- 10.2 Support from internal or external services will be provided as appropriate for any individuals, staff or participants, impacted by safeguarding issues

11.0 TRAINING

- 11.1 All staff and participants whose roles and responsibilities include regular contact with children and potentially vulnerable individuals will receive training and guidance appropriate to their role. All staff will be made aware of this policy and procedure and related guidance.

12.0 INFORMATION SHARING AND CONFIDENTIALITY

- 12.1 A general principle for processing information is that information is only shared with the consent of the subject of the information. In some circumstances however, it will not be appropriate to seek consent before sharing information with others and / or information can be shared where consent has been refused. The exception to this is where to do so would: 1. Place the child, an adult or others at increased risk of Significant Harm; or 2. Undermine the prevention, detection or prosecution of a serious crime (i.e. any crime which causes or is likely to cause significant harm to a child or to an adult) including where seeking consent might lead to interference with any potential investigation.

13.0 APPENDICES

- Appendix 1 – Code of Practice on Working with Vulnerable Groups
Appendix 2 – Reporting flowchart for Staff and Participants

APPENDIX 1 - CODE OF PRACTICE ON WORKING WITH VULNERABLE GROUPS

The following code of practice applies to all organisational staff and participants working with children, young people or adults in a vulnerable situation, whether acting in a paid or unpaid capacity:

- Avoid unnecessary physical contact.
- Avoid taking members of vulnerable groups alone in a vehicle on journeys, however short.
- Unless circumstances make it impossible to comply, do not take members of vulnerable groups to the toilet unless either (a) another adult is present or (b) another adult is aware (this may include a parent or group leader).
- If working off campus, enter schools and other organisations through the main entrance and sign in at reception
- If you find you are in a situation where you are alone with a member of a vulnerable group wherever practicable make sure that others can clearly observe you.
- Avoid close personal relationships with members of vulnerable groups in relation to whom you are in a position of trust.
- Do not take photographs of children unless parental permission has been given in advance. Never take photos on a mobile phone
- Do not accept gifts from children or vulnerable adults and do not give gifts unless they are part of an agreed reward scheme
- When dealing with children in particular, wear clothing that promotes a positive and professional image
- Do not make suggestive or inappropriate remarks to or about members of vulnerable groups, even in fun, as this could be misinterpreted. Keep all channels of communication professional
- Avoid using mobile phones in front of children and young
- If a member of a vulnerable group accuses a participants or member of staff of abuse or inappropriate behaviour, you should report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusations of historic, and not just recent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusation from a member of a vulnerable group, it is important to listen without making or implying any judgement as to the truth of the complaint or accusation. Avoid jumping to conclusions about others without checking facts
- If a member of a vulnerable group makes a complaint, or if there are other reasons for suspecting abuse, you should not attempt to investigate this yourself, but should report your concerns to the designated individual appointed under UKfilmNet's policy ("the policy") on the safeguarding of children and other vulnerable groups.
- Participate in the training available to you to support you in your work with vulnerable groups.
- Remember that those who abuse members of vulnerable groups can be of any age (even other members of vulnerable groups), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.

- Good practice includes valuing and respecting members of vulnerable groups as individuals, and the adult modelling of appropriate conduct – which would exclude bullying, aggressive behaviour and discrimination in any form.
- Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in the policy. Any information received should be acted upon sensitively, effectively and efficiently. Wherever possible, those making allegations should be given information about the outcome.
- Keep details and personal information confidential and ensure they are stored securely
- Although allegations should be reported only on a “need to know” basis, staff and participants making allegations need not be concerned that they will be breaching confidentiality or the Data Protection Act, as complying with the policy overrides such obligations. If the person making the allegation feels they need counselling or other appropriate support from UKfilmNet, they are encouraged to seek it.
- Ensure that you comply with appropriate licensing laws.

APPENDIX 2 – REPORTING FLOWCHART FOR STAFF OR PARTICIPANTS



