

Beacon Films CIC

SAFEGUARDING POLICY

A Safeguarding Policy, Procedures & Code of Conduct for the protection of children, adults at risk and project workers

All general queries:-
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Definitions:

The Company = Beacon Films CIC

Workers = Employees, freelancers or agency staff working for Beacon Films

Participants= Children (anyone aged under 18 years) or Adults at Risk* who are taking part in a programme of activity provided by Beacon Films

Project = The programme of activity being provided at any particular time by Beacon Films

*The Care Act 2014 has discontinued the definition of “Vulnerable Adult” as specified in No Secrets 2000. There is no longer a definition of “Vulnerable Adult”; instead we refer to the indicators of an “Adult at Risk”:

Safeguarding Duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing or 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.

Please also refer to our **Safeguarding: Reporting Procedures** document.

Please also refer to our **Policy Schedule & Checklist** (for training renewal dates etc)

Beacon Films CIC Safeguarding Officers (DSO) are:

DSO: MICHELLE FOX, 07775 850059, michelle@beaconfilms.org.uk

Workshop SO: JOHANNA SMITH, 07539 228 455, johanna@beaconfilms.org.uk

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SECTION A – SAFEGUARDING POLICY AND PROCEDURES

Part 1 – Acting on Concerns

1. Beacon Films CIC recognises that safeguarding children and adults at risk is everybody's responsibility. We should never assume that "someone else" is dealing with concerns or issues. We recognise that all organisations and the individuals that work in them have a responsibility for acting on concerns no matter where the source of that concern is.
2. In line with our Equality Policy, all participants will be treated equally in relation to this policy and code of conduct, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.
3. At the beginning of every project, all participants and their parent/carer or support sign a Data Protection agreement (see separate policy). This agreement explains that if Beacon Films receives information from a participant that leads to concerns that the participant may be at risk of harm - then the company will be required to share this information on a strictly "need to know" basis. We believe it is important that parents, carers, supporters and participants engage with us from the outset on this understanding.
4. Safeguarding Children means
 - protecting children from abuse and maltreatment
 - preventing harm to children's health 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.(source: NSPCC 2016)

Safeguarding children and child protection guidance and legislation applies to all children under the age of 18.

5. Safeguarding Adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect while at the same time making sure that the adult's welfare is promoted including where appropriate having regard to their views, wishes, feelings and beliefs in deciding on any action. (source: Care Act 2014).
6. Workers should be aware of signs and indicators of abuse that might be presented by participants for example:
 - Multiple bruises / scratches
 - Bruises in unusual places
 - Burns and scalds
 - Injuries to the mouth
 - Eating disorder, ravenousness or lack of appetite
 - Unexplained/sudden weight loss or weight gain
 - Self harming
 - Low self esteem

- Aggressive or withdrawn behaviour
- Unexplained change in behaviour
- Unexplained lack of attendance or punctuality
- Smelly or dirty appearance
- Inappropriate clothing or sexual behaviour
- Stealing or hiding food
- Difficulty in moving limbs
- “Frozen Watchfulness”
- Sudden unexplained lack of money
- Unexplainable “covering up” of parts of the body (in an attempt to hide physical signs of abuse.) E.g A scarf in summer?

5. Workers should particularly note that in the case of physical abuse, the injuries are often inflicted on parts of the body that are easier to hide under clothing. Therefore those agency staff that are involved in intimate care with participants should be particularly wary and report any concerns to the designated safeguarding officer.

6. If workers have concerns about any participant, they should speak to the designated safeguarding officer at the soonest possible opportunity. **If in doubt, share your concerns.**

7. It may be that a participant comes directly to you with an allegation. If they do:

- a) Respond to them as quickly as possible (don't say you'll “talk to them about it later”. Ask a fellow worker to deputise for you if you are running a session)
- b) Remain calm and take seriously what they tell you
- c) If appropriate, ask the participant if they can choose another worker to come with you as an additional witness to what they say. This may include circumstances where you may struggle to communicate with the participant and require help from someone else to understand them. In all circumstances the participant must choose which additional worker is invited into the conversation and if they decide that no-one else should be involved, then this wish must be respected.
- d) Under no circumstances say that you will keep a secret or “not tell” and let them know that you will have to tell someone what they tell you.
- e) Listen and be non judgemental
- f) Be reassuring and avoid any direct questioning* (avoid “who”, “what”, “where” etc).
- g) Be aware of the TED approach when gathering information from the participant, i.e. using questioning that begins “Tell me”, “Explain” or “Describe”.
- h) **As soon as possible after they have told you** record in **their own words*** what they say.
 - i) What was seen or said
 - ii) Names of alleged victim, alleged abuser, witnesses
 - iii) Record the actual words said by the alleged victim
 - iv) Separate fact from opinion
 - v) Sign, time and date the document. This could be used in court.
 - vi) Adult safeguarding guidelines now include that we should ask what the best outcome for them would be (whilst remaining clear that to ‘not refer’, what they are telling you onwards, is not an option).
- i) Avoid writing things down whilst they are telling you as this may distract and put them off.
- j) Preserve any evidence, where possible.
- k) Avoid comforting the participant physically (i.e through a hug etc)

- l) Report this at the soonest possible opportunity to the designated safeguarding officer and **do not** directly challenge the alleged perpetrator/s.
- m) The designated safeguarding officer will support the worker to complete an incident form and deal with all concerns in line with guidance from the relevant local authority

** If your written account ends up going to court, it is vital that the account is as close as possible to how the participant describes it, including the language and words they use. For example, if the participant refers to their “nanna”, but in your account you write “grandma”, this could be picked up by the defense as you “putting words into their mouth”.*

8. If the allegation is from one participant to another participant, the same steps as above should be followed. Once this has taken place, form two separate groups, ensuring that the accuser and the accused are in different groups. Keep these two groups separate for the remainder of the session. Try to ensure that there are two workers with each group if in different rooms, or if there aren't enough workers, have the two groups at different ends of the same room. Ensure that accuser and accused do not have any unsupervised contact for the remainder of the session. Under no circumstances should reference to the allegations be made to the group as a whole or the accused but the accuser should be given appropriate support **and allowed to go home if they wish to**. The Safeguarding Officer should be informed as immediately as possible so that reporting can take place and advice sought straight away.

9. If a worker witnesses a participant acting inappropriately towards another participant, the perpetrator should be taken to one side and it should be explained clearly why that behaviour is inappropriate. Thereafter, as in #8, form two groups and ensure that they are separated for the remainder of the session. The Safeguarding Officer should be informed as soon as possible who will seek immediate advice from the relevant agencies as to how to proceed.

10. When sharing information it is of vital importance that workers do this so on a strictly “need to know” basis and in line with our confidentiality policy. In the first instance workers should share their concern with the designated safeguarding officer unless the individual is in immediate danger, in which case, call the police. Remember that if you are ever contacted about a participant the person contacting you **might not be who they say they are**. If ever contacted by a Social Worker (or other official) who you do not know call them back through the relevant switchboard to confirm their identity.

11. All reporting of concerns will be compliant with new GDPR data protection legislation, coming into effect on 25.5.2018. Please refer to “Reporting of Concerns” document and data protection policy.

Part 2A – Creating a Safe Environment at Beacon Films

1. All workers should all have DBS (Disclosure and Barring Service) Enhanced Disclosures that are less than three years old at the time they are working on a project.

2. All DBS documentation, accompanied by photo ID, should be presented to designated safeguarding officer or someone they have assigned prior to project commencing.

3. The DBS and photo ID documentation presented must be original (not photocopies). All documentation must be checked in full. In line with our **Data Protection Policy**, the following information should be recorded in the **passworded** Word document on the Beacon Films cloud:

- The full name
- The date of birth
- The unique reference number
- The date of issue
- The issuing authority

4. Should the DBS documentation make reference to any convictions, the designated safeguarding officer should be informed before the person concerned is engaged in the project.

5. It is NOT permitted to make photocopies of DBS documentation.

6. At its discretion, the company may involve adult workers in project activity who do NOT have a valid DBS check (e.g. an industry professional delivering a masterclass) as long as this only applies to those who do not have regular contact with participants and is thoroughly risk assessed.

7. Regardless of whether they have a DBS or not, workers should avoid being left alone in a space with participants. They should always try to ensure that they always have at least one other worker with them.

8. The company understands that there are certain situations in which being alone with participants is unavoidable and that a common-sense approach is required. The company therefore accepts that workers may spend periods of time alone with project members (e.g. volunteers working in the office, participants working as a member of staff, a participant arriving early for a session or leaving late, a participant being engaged in an evaluation conversation) on condition that a) the worker retains the right to request that they are not left alone with the participant and that this request will be honored by the company b) this never applies to workers who have not presented a DBS (see point #6 above) c) it should be for the shortest time possible d) that they avoid being alone with any participants that display behaviour outlined in the next clause, and d) that when working with participants alone whilst workshop activity is happening nearby, workers try to remain in view or in close proximity to main workshop activity.

9. Workers should avoid any physical contact with participants unless appropriate to the activity concerned. They should not feel embarrassed to discourage and report any inappropriate physical behaviour displayed by participants towards them to the designated safeguarding officer.

10. Workers should also be aware of any inappropriate behaviour presented by one participant towards another (particularly flirtatious/sexual), and likewise report any concerns. See also Section A, Part 1, point 8.

11. Workers, whilst respecting the confidentiality of issues that may be raised by participants, should never promise to “keep a secret” or “not tell” (See Section A - Safeguarding Policy & Procedures, Part 1 – Acting on Concerns”)

12. Workers should – at the soonest possible opportunity – report any concerns regarding any participants to the designated safeguarding officer. They should avoid taking any unilateral action unless the participant is in immediate danger. (See Section A - Safeguarding Policy & Procedures, Part 1 – Acting on Concerns”)

13. If a participant begins acting inappropriately towards a worker, they should inform the designated safeguarding officer at the soonest possible opportunity and take extra-special care to avoid being left alone in a space with that participant.

14. If a participant requires assistance to find the toilet, workers should never enter the toilet with the participant. If the participant needs assistance to return, the worker should wait outside the toilet exterior entrance (e.g. in the corridor) and then return with the participant once they exit.

15. If participants require more assistance than this for going to the toilet, a separate risk assessment will be created for that individual student who will receive support from an appropriately accredited worker in accordance with our Health and Safety and Support policies.

16. Workers should familiarise themselves with the workshop risk assessment, which will include provision for individual students who have individual or complex needs.

17. All concerns or incidents that arise should be recorded in an incident form (see Health and Safety policy). The designated safeguarding officer will advise on this.

18. Participants should not be allowed to take photographs on their own phone or cameras during sessions.

19. Participants who take part in projects and/or appear on film or photographs must complete a Media Release and Consent Form before doing so. Participants who are under 16 must ALWAYS have the form countersigned by a parent or legal guardian. Participants who are over 16 must have the form countersigned by a parent/guardian where Beacon Films believes that the individual requires support to fully understand the Media Release and Consent Form.

20. All participants under 16 will be credited by first names only in all instances.

21. Participants aged 16 and over and their families must give explicit permission before full names of participants are used to credit their involvement in a project.

22. The separate Data Protection agreement which is signed by all participants and their parents /carers before each project begins, includes references to use of full names (and making clear the option to opt out of this) and the importance of e-safety and checking privacy settings e.g. on Facebook. See Data Protection policy for more information.

23. Above all, workers should never be afraid to ask even the most basic questions. The Designated Safeguarding Officer is Michelle Fox, her contact details are above.

Part 2B – Supporting a safe environment outside Beacon Films

1. It is recognised that increasingly, Beacon Films is supporting participants to use their film skills more independently in their local communities.
2. When participants are operating outside its direct supervision, it is not possible for Beacon Films to be directly responsible for them. However the company believes it is important to put in place additional measures to support safeguarding against abuse and neglect in these circumstances.
3. The following additional measures will be put in place for any official Beacon Films programmes that involve participants using their film skills beyond the direct auspices of the company.
4. The additional measures are:
 - a) a simple one-page, easy read and up to four-way agreement between i) **Beacon Films**, the ii) **project member/s**, iii) the **organisation or individual** who is supporting them to use their film skills beyond Beacon Films and iv) the project member/s **parent, carer or supporter** where appropriate
 - b) a **safeguarding risk assessment** specifically for the project, agreed by the same parties and
 - c) **safeguarding training for project members** themselves, so they can find it easier to judge when behaviour towards them is inappropriate and what to do about it in such circumstances.
5. Refer to the **Supporting a Safe Environment Outside Beacon Films Implementation Plan** document for more information on implementation of this section of our safeguarding policy and for the template agreement.

SECTION B – BEHAVIOURAL CODE OF CONDUCT

All workers must follow this personal / behavioural code of conduct, in addition to the procedures above. It is the duty of all workers to inform the designated safeguarding officer if they witness another worker breaching this following code of conduct or procedures listed above.

1) Duty of Care and Professional Judgement

All workers will:-

- understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.
- always act, and be seen to act, in the participant's best interests
- avoid any conduct which would lead any reasonable person to question their motivation and intentions
- take responsibility for their own actions and behaviour.
- discuss the circumstances that informed their action, or their proposed action, with a senior colleague. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted
- always discuss any misunderstanding, accidents or threats with the designated safeguarding officer
- always record discussions and actions taken in relation to safeguarding with their justifications.

2) Positions of Power and Trust

Workers will never:-

- use their position to gain access to information for their own advantage and/or a participant's or family's detriment

- use their power to intimidate, threaten, coerce or undermine participants
- use their status and standing to form or promote relationships with participants, which are of a sexual nature
- embarrass or humiliate participants

3) Confidentiality

Workers:-

- are expected to treat information they receive about participants in a discreet and confidential manner.
- if in any doubt about sharing information they hold or which has been requested of them should seek advice from the designated safeguarding officer
- understand the need to be cautious when passing information to others about a participant.

4) Propriety and Behaviour

Workers will not:-

- behave in a manner which would lead any reasonable person to question their suitability to work with participants or act as a role model.
- make sexual remarks to a participant (including email, text messages, phone or letter)
- discuss their own sexual relationships with, or in the presence of, participants
- discuss a participants' sexual relationships in inappropriate settings or contexts
- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.

5) Dress and Appearance

Workers will:-

- ensure they are dressed decently, safely and appropriately for the tasks they undertake.
- promote a positive and professional image
- not wear clothes likely to be viewed as offensive, revealing, or sexually provocative
- not wear clothes that distract, cause embarrassment or give rise to misunderstanding
- wear clothes that are absent of any political or otherwise contentious slogans

6) Gifts

Workers will:-

- ensure that gifts received or given in situations which may be misconstrued are declared using incident forms.
- generally, only give gifts to an individual participant as part of an agreed reward system
- where giving gifts other than as above, ensure that these are of insignificant value and given to all participants equally.

7) Infatuations

Workers will:-

- report any indications (verbal, written or physical) that suggest a participant may be infatuated with a worker (on incident forms and directly to designated safeguarding officer)

8) Social Contact

Workers will:-

- advise designated safeguarding officer of any regular social contact they have with a participant which may give rise to misunderstanding.
- report and record any situation, which they feel, might compromise Beacon Films' or their own professional standing.

9) Social Networking

Workers will:-

- uphold the law and maintain a good standard of behaviour both inside and outside of the company; both online and offline. The content in cyberspace does not elude the law – a posting in the public domain can still constitute a defamatory publication. Employers can take disciplinary action if they can prove your conduct has caused detriment.
- note that they may lose respect in their post and defamation of character by placing things in the public eye that relate to their role or other members of staff.

10) Public Communications

- Placing images and videos of themselves on a public space on the internet such as 'YouTube', or 'Facebook', which could show themselves or other workers in a way which could damage the company's reputation should be avoided and the company will take seriously any action deemed to show a lacking in standards both online and offline.
- Discussing other workers or participants in a negative fashion in a public space on the internet goes against this 'Code of Conduct' and does not treat people with respect and courtesy.
- All workers have the responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of participants.

11) Communication with Participants

- Communication between workers and participants by whatever method should take place with clear and explicit professional boundaries.
- Workers should not share any personal information with any participants. They should not respond to requests or request any personal information from the participant, other than that which may be appropriate as part of their professional role.
- Workers should ensure that all communications are transparent and open to scrutiny.

By adhering to these guidelines staff are not only protecting the reputation of Beacon Films but also their own reputation and chances for future employment.

12) Participants in Distress

Workers will:-

- consider the way in which they offer comfort to a distressed participants
- record situations which may give rise to concern on an incident form.

13) Behaviour Management

- Workers will avoid any physical intervention unless it is imperative to prevent physical harm being caused to participants or workers.
- Individual risk assessments and/or procedures will be carried out for participants who may, through their behaviour, present a risk to themselves or to others

14) Sexual Contact

Workers will:-

- not pursue sexual relationships with participants either in or out of project sessions. In particular your attention is drawn to the provisions of the Sexual Offences Act 2003, which creates a new criminal offence of abuse of a position of trust (when a person aged 18 or over is in a 'position of trust' with a person under 18 and engages in sexual activity with or in the presence of that child, or causes or incites that child to engage in or watch sexual activity)
- avoid any form of communication with a participant which could be interpreted as sexually suggestive or provocative ie verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

15) One to One Situations

Workers will:-

- avoid meetings with participants in remote, secluded areas of project venue/s
- avoid being left alone in a space with participants and try to ensure there is always another worker with them.
- Ensure, in situations where being alone with participants is unavoidable, there is visual access and/or an open door in such situations
- avoid use of 'engaged' or equivalent signs wherever possible.
- consider the needs and circumstances of the participants involved.
- This code of conduct recognises that where a participant has become a paid member of staff or a volunteer that there will be one-to-one situations in the office environment with workers or other volunteers. A common sense approach is required including a risk assessment when necessary.

16) Transporting Participants

- Workers will not be expected to transport participants for any reason except when a specific risk assessment and/or necessary procedures are followed for the purpose as per health and safety policy. This includes that the worker is adequately insured and that they are not transporting the participant alone and always have another DBS-checked worker with them. See Health and Safety policy for further information.

17) Intimate Care

- Beacon Films workers are not permitted to carry out any activity constituting "intimate care" or "personal care" including, but not limited to, supporting toileting, any activity which means seeing parts of the body ordinarily covered by clothes, and support with eating or drinking unless such duties are carried out by agency workers from reputable and appropriately accredited agencies (CQC) to carry out such duties in line with their own intimate/personal care policies. See Support Policy for more information.

18) Photos, Videos and Creative Arts

Workers will:-

- ensure participants complete necessary documentation before being photographed or filmed (see points 18-22 in Part 2A – Creating a Safe Environment at Beacon Films)
- ensure that all images are available for scrutiny in order to screen for acceptability
- be able to justify images of participants in their possession

19) Sharing of Concerns

Workers will:-

- report any behaviour by colleagues or participants, or allegations, that raises concern (to designated safeguarding officer).
- be familiar with the system for recording concerns (incident forms)
- take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the project environment