

Empire Kids Official Ltd

Child Safeguarding Policy

1. Introduction

The purpose of this policy statement is:

- To protect children and young people who receive Empire Kids Official Ltd services from harm. This includes the children of adults who use our services
- To provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection. This policy applies to anyone working on behalf of Empire Kids Official Ltd, including senior managers, paid staff, volunteers, sessional workers, agency staff and students.

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents, which can be found on our website.

Empire Kids Official Ltd believe children and young people should never experience abuse of any kind

- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them

We recognise that:

The welfare of children is paramount in all the work we do and in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse

- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to keep children and young people safe by:

- Valuing, listening to and respecting them
- Appointing a nominated child protection lead for children and young people, a lead trustee/board member for safeguarding
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Developing and implementing an effective online safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently

- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: [ico.org.uk/for](https://ico.org.uk/for/organisations) organisations]
- Sharing information about safeguarding and good practice with children and their families
 - Making sure that children, young people and their families know where to go for help if they have a concern using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment our website holds further information
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

Important Information

The following information is what we would like to highlight to our talents to make them aware of what is and isn't expected when on SET - please take your time to read and digest as it is very detailed but at the same time very important!

For the purpose of this statement policy statement, we are going to refer to the Film and Modelling Industry as **FMI** (please note this is not a governing body but purely an acronym)

- The welfare of the child is paramount ensuring that all children, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity entrusted into the care of FMI for any period of time, are and will feel contented and safe.
- Taking all reasonable steps to protect children from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
- Treating all suspicions and allegations of poor practice or abuse seriously and responding to them swiftly and appropriately
- All FMI's personnel who may in the course of their work for FMI work with children, will be recruited with regard to their suitability for that responsibility, and will be provided with guidance and/or training in good practice and child protection procedures
- Working in partnership with parents, child-guardians and children, for the protection of children

1.2 Monitor and review the policy and procedures

- All FMI personnel are urged to report any challenges, difficulties, gaps and areas that indicate child protection needs and/or the need to amend this policy, to the relevant Board of Directors of the appropriate industries and if deemed appropriate to other authorities.

2. Promoting Good Practice

2.1 Introduction

- To provide children with the best possible experience and opportunities in film production activities, all FMI directors, members, employees and volunteers must operate within the terms and conditions of industry Policies.

- It is not always easy to distinguish poor practice from abuse.

- It is therefore NOT the responsibility of members, employees, volunteers or participants to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the child, as explained in section 4.

This section will help you identify what is meant by good practice and poor practice.

2.2 Good Practice

- All personnel should adhere to the following principles and action:
- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience of working on a film or being filmed an enjoyable and rewarding experience: promote fairness, confront and deal with bullying
- Treat all young people equally and with respect and dignity
always put the welfare of the young person first, sacrificing the acquisition of desired film content if need be.
- Maintain a safe and appropriate distance from children and young people (e.g., it is not appropriate personnel or volunteers to have an intimate relationship with a child or to be alone with them in a room during recording)
- Avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person.
- Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given
- Involve parents/guardians wherever possible, e.g., where young people need to change cloths, encourage parents to take responsibility for their own child. For children under 16, parental consent

to film the child is mandatory (always required) and parents / guardians must be given the option to be present during interviewing and filming a child under 16 years of age.

- Written parental consent must be obtained if FMI personnel is required to transport young people in their cars
- Gain written parental consent for any significant travel arrangements e.g. overnight stays
- Ensure that if mixed teams are taken away, they should always be accompanied by a male and female member of staff ensure that at away events adults should not enter a young person's room or invite young people to their rooms
- Be an excellent role model, this includes not smoking or drinking alcohol in the company of young people
- Always give enthusiastic and constructive feedback rather than negative criticism
- Recognising the developmental needs and capacity of the young person. Industry directors, camera and sound operators must sacrifice seeking or retaining sought after recorded material (video, photographic stills, and audio) of children and young people under 18 if its recording or its broadcast puts the psychological and/or physical welfare of a child at risk.
- No child or young person should be persuaded or coerced into agreeing to do or say something on camera or audio recording that they feel reluctant or uncomfortable doing or saying.
- Secure written parental consent for the FMI to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises
- Keep a written record of any injury that occurs, along with details of any treatment given

2.3 Poor Practice

The following are regarded as poor practice and should be avoided by all personnel:

- Unnecessarily spending excessive amounts of time alone with young people away from others
- Taking young people alone in a car on journeys, however short
- Taking young people to your home where they will be alone with you
- Sharing a room with a young person
- Engaging in rough, physical or sexually provocative games, including horseplay
- Allow or engage in inappropriate touching of any form
- Allowing young people to use inappropriate language unchallenged
- Making sexually suggestive comments to a young person, even in fun
- Reducing a young person to tears as a form of control

- Allow allegations made by a young person to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature that the young person can do for themselves
- When a case arises where it is impractical/impossible to avoid certain situation e.g., transporting a young person in your car, the tasks should only be carried out with the full understanding and consent of the parent/guardian and the young person involved.
- If during your care you accidentally hurt a young person, the young person seems distressed in any manner, appears to be sexually aroused by your actions and/or if the young person misunderstands or misinterprets something you have done, report any such incidents as soon as possible to another colleague and make a written note of it. Parents should also be informed of the incident.

3. Defining Child Abuse

3.1 Introduction

- Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm, it commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust.
- Abuse can happen to a young person regardless of their age, gender, race or ability.
- There are four main types of abuse: physical abuse, sexual abuse, emotional abuse and neglect.
The abuser may be a family member, someone the young person encounters in residential care or in the community, including sports and leisure activities. Any individual may abuse or neglect a young person directly, or may be responsible for abuse because they fail to prevent another person harming the young person.
- Abuse in all of its forms can affect a young person at any age. The effects can be so damaging that if not treated may follow the individual into adulthood.
- Young people with disabilities or otherwise disadvantaged, may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse had occurred.

3.2 Types of Abuse

- Physical Abuse: where adults physically hurt or injure a young person e.g., hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning. Giving young people alcohol or inappropriate drugs would also constitute child abuse.
- This category of abuse also includes when a parent/carer reports non-existent symptoms or illness deliberately causes ill health in a young person they are looking after. This is called Munchausen's syndrome by proxy.
- In a filming situation, physical abuse may occur when a child is asked to do undertake in front of the camera, strenuous physical activity of a nature and intensity that exceeds the capacity of the

child's immature and growing body.

- Emotional Abuse: the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve telling a young person they are useless, worthless, unloved, inadequate or valued in terms of only meeting the needs of another person. It may feature expectations of young people that are not appropriate to their age or development. It may cause a young person to be frightened or in danger by being constantly shouted at, threatened or taunted which may make the young person frightened or withdrawn.
- Ill treatment of children, whatever form it takes, will always feature a degree of emotional abuse.
- Emotional abuse in filming may occur when a young person is asked to relate unpleasant experiences or make self-incriminating statements on video or audio recordings, or is expected to perform at levels that are above their capability.
- Other forms of emotional abuse could take the form of allowing children or young people to undermine their own dignity by recording them name calling, bullying or using the camera or audio recordings to spread rumours.
- Planned Industry filming shoots will be designed to prevent children and young people from disclosing information that could be held against them at any time in the future (e.g. lead to future employment discrimination), or cause them future discomfort or embarrassment (ghosts that come back to haunt them).
During film editing, further scrutiny will be applied to ensure all material which could cause children or young people under 18 discomfort, embarrassment or future negative repercussions, is excluded from the film.
- Bullying may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are four main types of bullying.
- It may be physical (e.g., hitting, kicking, slapping), verbal (e.g., racist or homophobic remarks, name calling, graffiti, threats, abusive text messages), emotional (e.g., tormenting, ridiculing, humiliating, ignoring, isolating from the group), or sexual (e.g., unwanted physical contact or abusive comments).
- In the media, bullying may arise when a parent or film maker (producer, director, camera or audio operator) pushes the young person too hard to disclose certain information or perform to a desired standard.
- Neglect occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or failing to ensure access to appropriate medical care or treatment.
- Neglect in interviewing and filming could occur when the personnel present do not keep the young person/people safe, or expose them to undue cold/heat or unnecessary risk of injury.
- Sexual Abuse occurs when adults (male and female) use children to meet their own sexual needs.

This could include full sexual intercourse, masturbation, oral sex, anal intercourse and fondling. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse.

- The Industry requires that children and young people aged under 16, and those aged under 18 who are looked after by local authorities or are under a court order, are only interviewed and recorded in the presence of 2 or more Industry personnel. The FMI requires that a parent or legal guardian of any child aged under 16, signs a consent form permitting the FMI to interview and/or film the child prior to the child being interviewed and/or filmed.

4. Indicators of Abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- An injury for which an explanation seems inconsistent
- The young person describes what appears to be an abusive act involving them
- Another young person or adult expresses concern about the welfare of a young person
- unexplained changes in a young person's behaviour e.g., becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- Inappropriate sexual awareness engaging in sexually explicit behaviour
- Distrust of adult's, particularly those whom a close relationship would normally be expected
- Difficulty in making friends
- Being prevented from socialising with others displaying variations in eating patterns including over eating or loss of appetite
- Losing weight for no apparent reason, becoming increasingly dirty or unkempt

Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down.
- An unexplained drop off in performance
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g., on food, alcohol or cigarettes
- A shortage of money or frequent loss of possessions

- It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of those working in FMI to decide that child abuse is occurring. It IS their responsibility to act on any concerns.

5. Use of Photographic/Filming Equipment at Group or Public Events

There is evidence that some people use filming events as an opportunity to take inappropriate photographs or film footage of young people. All Industry personnel should be vigilant and any concerns should be reported.

All parents should be made aware, and required to give their consent when Industry personnel use recording equipment to record their child even if only in crowd scenes e.g. during a lesson in a classroom.

6. Responding to Suspicions and Allegations

6.1 Introduction

It is not the responsibility of anyone working in FMI in a paid or unpaid capacity to decide whether or not child abuse has taken place. However there is a responsibility to act on any concerns through contact with the appropriate authorities so that they can then make inquiries and take necessary action to protect the young person. This applies BOTH to allegations/suspicions of abuse occurring within the industry and to allegations/suspicions that abuse is taking place elsewhere. This section explains how to respond to allegations/suspicions.

6.2 Receiving Evidence of Possible Abuse

- We may become aware of possible abuse in various ways. We may see it happening, we may suspect it happening because of signs such as those listed in sections 2.3 & 3 of this document, it may be reported to us by someone else or directly by the young person affected.
- In the last of these cases, it is particularly important to respond appropriately. If a young person says or indicates that they are being abused, you should:
 - Stay calm so as not to frighten the young person
 - Reassure the child that they are not to blame and that it was right to tell
 - Listen to the child, showing that you are taking them seriously
 - Keep questions to a minimum so that there is a clear and accurate understanding of what has been said. The law is very strict and child abuse cases have been dismissed where it is felt that the child has been led or words and ideas have been suggested during questioning. Only ask questions to clarify inform the child that you have to inform other people about what they have told you. Tell the child this is to help stop the abuse continuing.

6.3 Safety of the child is paramount

- If the child needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a child protection issue
- Record all information
- Report the incident to the relevant Industry Officials
- To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions.

Information should include the following:

The child's name, age and date of birth

The child's home address and telephone number.

6.4 Reporting the Concern

- All suspicions and allegations MUST be reported appropriately. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.
- The Industry expects its members and staff to discuss any concerns they may have about the welfare of a child immediately with the person in charge and subsequently to check that appropriate action has been taken.
- As mentioned previously in this document the FMI are not child protection experts and it is not their responsibility to determine whether or not abuse has taken place. All suspicions and allegations must be shared with professional agencies that are responsible for child protection. Social services have a legal responsibility under The Children Act 1989 to investigate all child protection referrals by talking to the child and family (where appropriate), gathering information from other people who know the child and making inquiries jointly with the police.
NB: If there is any doubt, you must report the incident: it may be just one of a series of other incidences which together cause concern

Contact details

Nominated child protection lead Name: CAROL GILBY

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NSPCC Helpline 0808 800 5000 We are committed to reviewing our policy and good practice annually.

Further links can also be viewed on our website.

This policy was last reviewed on: 22nd March 2021

Signed: Carol Gilby EKO Company Director

Date: 22/03/21

Any questions Please Contact Empire Kids Official Ltd (EKO)