

Safeguarding Policy

Issue	Date	Responsibility
1	14/07/2016	Karen Birch
2	24/08/2016	Karen Birch
3	23/11/2017	Karen Birch
4	November 2018	Emily Bowman
5	08/05/2019	Emily Bowman
6	29/04/2020	Emily Bowman
7	26/05/2021	Emily Bowman
8	28/07/2021	Emily Bowman
9	27/07/2022	Emily Bowman
10	21/07/2023	Caroline Frankland
11	25/10/2024	Caroline Frankland

Purpose

The purpose of The Mighty Creatives Safeguarding Policy is threefold: child protection; safeguard adults against accusations; keep the organisation within the law (statutory requirements). The policy aims to promote good practice, to raise awareness and to support trustees, staff, volunteers, contractors, and partners to make informed and confident responses to specific protection and safeguarding issues. It gives important information about how to recognise signs of abuse and clear procedures for action in the case of suspected abuse. The policy also sets out the process to be followed by staff when they have concerns about a child, key contacts at The Mighty Creatives and key organisations. The policy is available at www.themightycreatives.com.

Safeguarding is everyone's responsibility. Having safeguards in place within an organisation not only protects and promotes the welfare of children but also it enhances the confidence of trustees, staff, volunteers, parents, legal guardians, and the general public.

Designated safeguarding leads

The Mighty Creatives has appointed three designated safeguarding leads – one a trustee and two permanent members of the staff team. One of these officers will be available when work with young people is taking place.

Caroline Frankland, Business manager, caroline@themightycreatives.com 07889 645112
(lead responsibility for child protection)

Emily York, Head of Programmes, Emily.york@themightycreatives.com 07771 728163

James Blyth, Programme Manager, james@themightycreatives.com 07464481363

Emrys Green, Trustee

What you need to do

We expect trustees, staff, volunteers, and contractors to have read, understood and adhere to this policy, related policies, and procedures. Please make sure:

1. You have read this policy - the policy and related documents are available on SharePoint and the policy published online at www.themightycreatives.com.
2. As a new member of staff or Trustee, you receive the Safeguarding Briefing and Introduction to Safeguarding Children Training Course, NSPCC online.
3. Volunteers will receive a safeguarding briefing prior to starting any programme of activity and will be asked to sign a code of conduct.
4. You are aware of the signs and symptoms of possible abuse.
5. You know what actions to take when you have concerns about a child.
6. You know who to contact if you have concerns or to make a referral and who your designated safeguarding leads are.

7. You carry out risk assessments for activity using the form, guide and training provided.
8. You have effective risk management and reporting systems in place for activity, as required by contractor's risk management procedures.
9. You always follow-through on our values commitment to keep children, and vulnerable adults safe from harm.

Safeguarding Policy Statement

The Mighty Creatives is committed to safeguarding all children and vulnerable adults that come into contact with our work. We believe that the welfare of children and vulnerable adults is paramount.

- All children and vulnerable adults have an equal right to protection from abuse and to be kept safe from harm, regardless of their age, race, religion, nationality, ability, gender, language, or sexual orientation/identity.
- Vulnerable adults are defined as anyone, who, for any reason, is unable to take care of themselves or protect themselves from exploitation.
- Every person must be considered on an individual basis. People who are termed as vulnerable or at risk might:
 - Have a learning disability
 - Have mental health problems
 - Have substance misuse problems
 - Have a long-term illness or chronic condition
 - Have a physical disability
- All suspicions and allegations of abuse should be taken seriously and responded to swiftly and appropriately (see section Dealing with situations where a child is in need).
- All activities involving children and vulnerable adults should be managed in an exemplary manner, with consideration given to risk assessments and risk management as a routine aspect of our work.
- Trustees, staff, volunteers, contractors, and partners should be clear about their responsibilities and know how to respond appropriately, supported by good practice in recruitment and procurement.
- The Mighty Creatives is committed to sound selection and recruitment procedures and good practice for all individuals working with the organisation whether in a paid or voluntary capacity.
- The Mighty Creatives will ensure that individuals will receive support through education and training, to be aware of and understand best practice and how to manage any welfare issues which may come to light.

- Specialist support and training will be put in place as required, for example safeguarding children with disabilities.
- The Mighty Creatives recognises that it is not the responsibility of trustees, staff, volunteers, or contractors to determine if abuse has taken place, but it is their responsibility to act upon and report any concerns.
- The Mighty Creatives is committed to embedding and promoting safeguarding throughout the organisation at every level of operation.

We will endeavour to safeguard children and vulnerable adults by:

- Valuing them, listening to and respecting them.
- Adopting this policy and adhering to associated policies and procedures
- Ensuring all necessary checks are made in the recruitment of all The Mighty Creatives workers, including trustees, staff, volunteers and contractors.
- Ensuring the appropriate permissions and risk assessments are completed and that effective risk management procedures are in place and signed off by a designated safeguarding lead.
- Sharing information about our safeguarding and child protection procedures with children, young people, parents and legal guardians, schools, other organisations and contractors so that roles and responsibilities are clear.
- Reporting disclosures and other concerns to agencies with responsibility for children and vulnerable adults, involving children, parents and legal guardians, school and organisational staff appropriately (see Safeguarding Briefing).
- Providing effective leadership to trustees, staff and volunteers through briefings and training.
- Providing effective management to staff and volunteers through supervision, support and training.
- Maintaining up to date knowledge on best practice, current and forthcoming legislation and procedures.
- Promoting child protection and safeguarding throughout the organisation and across partnerships.

Policy review

We are committed to reviewing this policy and procedures annually or when changes in legislation require, updating the action plan and related policies and procedures as required. The related policies are:

- Anti-bullying and Harassment Policy
- Data Protection Policy
- DBS Policy

- Digital Policy
- Whistleblowing Policy

We will work with child protection and safeguarding specialists when reviewing the policy.

In addition to this policy, we have a Safeguarding FAQ document which provides further practical information about this policy.

Dealing with situations where a child or vulnerable adult is in need

The Mighty Creatives will take every reasonable step to ensure that children and vulnerable adults are protected where:

- Our own staff are directly involved in a project or partnership, including young people involved in the governance of our organisation, those in direct communication with us through our services, products and project activities, and those taking part in work placements.
- We contract an individual or organisation to work with children and vulnerable adults in schools and other settings.
- We work in partnership with another organisation.

It is important to remember that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is a task for the professional child protection agencies following a referral to them by a designated safeguarding lead.

Recognising signs of abuse

Suspicious

The Mighty Creatives trustees, staff, volunteers and contractors should be aware of the Signs and Symptoms of Abuse and should make sure they can recognise these in the children and vulnerable adults they come into contact with. Any suspicion of abuse must be shared with a designated safeguarding lead at The Mighty Creatives reported using a Reporting Disclosure Form (see appendix c) and shared with the designated safeguarding lead at the school/setting.

- If anyone sees or suspects abuse of a child or vulnerable adult, they should share this with the designated safeguarding lead.
- If they suspect that the person with legal responsibility is actually the source of the problem, they should make their concerns known to another designated safeguarding lead, and in schools, the Chair of Governors.
- The individual should make a note for record of what they have witnessed as well as their response.

Types of abuse

We acknowledge that there are five types of child abuse as defined in 'Working Together to Safeguard Children' (2018) which is also defined in the 'Keeping Children Safe in Education Statutory Guidance, 2024'. See appendix A for further information.

The Mighty Creatives understands that there are indicators of child abuse; however, these should not be considered as a definitive list, but used when considering the possibility of abuse in children. A full explanation of indicators is in Appendix B.

- Bullying including cyber bullying and cyber crime
- Children at risk of exploitation including child sexual exploitation
- Child sexual abuse within the family
- Compromised parenting, particularly in relation to babies and very young children
- Domestic Abuse and teenage relationship abuse
- Fabricated or induced illness
- Faith abuse
- Forced marriage, Female Genital Mutilation (FGM) and breast ironing
- Gangs, youth violence and trafficking
- Gender based violence/Violence against women and girls (VAWG)
- Hate including race hate, discrimination, including LGBTQI+
- Mental Health
- Missing children from education and home
- Online abuse/Sexting/harassment
- Private Fostering
- Preventing Radicalisation
- Substance and alcohol abuse

The Mighty Creatives understands that there are specific safeguarding issues, which we will ensure all trustees, staff, volunteers and contractors will be trained to understand, identify, report, and monitor these concerns.

Domestic Abuse

Domestic Abuse is rarely a one-off incident, but a pattern of power and control. It is any threatening behaviour, violence or abuse between adults who are, or have been in a

relationship, or between family members. It can be psychological, physical, sexual, financial, or emotional abuse.

Children living with Domestic Abuse in their home or who are caught up in incidents of Domestic Abuse, are victims, and this can seriously harm children and young people. Some children are physically harmed as they can get caught up in the incident, some children are witnesses to the abuse, or hear the abuse. The impact on children living in a household where there is Domestic Abuse is likely to influence their development and social skills. We will treat any disclosure of information relating to Domestic Abuse as a Safeguarding concern and we will follow local Safeguarding Procedures.

Emotional/Mental Health and Wellbeing

All trustees, staff, volunteers and contractors should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that trustees, staff, volunteers and contractors are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

We acknowledge many children will have periods of feeling anxious, afraid and upset, and can develop phobias. However, some children will experience this more frequently.

Online Safety, Cyber Security

The Mighty Creatives will work with our partners to keep children safe when online.

We will ensure that we have information and processes to raise awareness of online safety and cyber security for all our trustees, staff, volunteers and contractors.

This will cover a range of online safety issues including:

- fraud and scams
- copycat websites, phishing e-mails
- identity theft
- cyberbullying/trolling, cyberstalking,
- online grooming, online radicalisation,
- offensive/illegal content including race hate
- child sexual exploitation online
- Youth produced sexual imagery (sexting, nudes, semi-nudes)
- Using social media platforms.

Cyber Security is a growing Safeguarding concern and we recognise the need to have procedures to ensure networks, data and systems are protected against Cyber threats and help keep our trustees, staff, volunteers, contractors and our beneficiaries safe, particularly when in relation to our CRM, remote learning platforms and remote teaching platforms and different delivery styles.

The Sending of Indecent Images from one child to another through Digital Media Devices, including nudes and semi-nudes.

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like which works offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and we will refer this to the police as a matter of urgency.

The Criminal Exploitation of Children

Criminal exploitation is child abuse where children under 18 and older where there is a vulnerable adult are manipulated and coerced into committing crimes.

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns and using dedicated mobile phone lines or "deal lines".

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. There are different types of cuckooing:

- Using the property to deal, store or take drugs
- Using the property to sex work
- Taking over the property as a place for them to live
- Taking over the property to financially abuse the tenant

The most common form of cuckooing is where drug dealers take over a person's home and use it to store or distribute drugs. Children living in these properties are at risk of neglect and other types of abuse.

The Sexual Exploitation of Children

Child Sexual Exploitation (CSE) is a type of child sexual abuse. It occurs where 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 sexual activity.

It can occur online, and many young people can be persuaded or forced to have sexual conversations by text or online, send or post sexually explicit images of themselves, take part in sexual activities via a webcam or smartphone.

Children and young people in sexually exploitative situations and relationships are persuaded or forced to perform sexual activities or have sexual activities performed on them in return for gifts, drugs, money, or affection.

All suspected or actual cases of CRE/CSE are a Safeguarding concern in which safeguarding procedures will be followed.

Forced Marriage/ Honour based Violence and Female Genital Mutilation (Child Protection)

All suspected or actual cases of FGM are a Safeguarding concern in which Safeguarding procedures will be followed. This will include a referral to the police. If any trustees, staff volunteers and contractors are concerned about a child, they should contact the Designated Safeguarding Leads. This will also apply to suspicions of a child been subject to treats of or honour-based violence.

If there are concerns that a child may be or is subject to breast ironing, this is Child Abuse and Safeguarding procedures will be followed and in all cases.

Prevent and Counter Terrorism

The Mighty Creatives will ensure all trustees, staff, volunteers and contracts will adhere to their duties under Prevent, as detailed in the Prevent Duty Guidance 2015, (also Prevent Duty Guidance for schools) to have due regard to the need to prevent people from becoming drawn into terrorism and to work with our partners to comply with any policies and procedures they have in place.

Peer on peer abuse

Definition

Peer on peer or child on child abuse occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children both on and offline. It is essential that all staff understand the importance of challenging inappropriate behaviours between children/young people.

It is most likely to include but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment; non-consensual sharing of nudes and semi nudes

images and/or videos; causing someone to engage in sexual activity without consent; upskirting; and initiation/hazing type violence and rituals.¹

Spotting the signs and indicators

- Absence from school or disengagement from school activities.
- Social isolation and withdrawal from daily activities
- Physical injuries.
- Mental or emotional health issues.
- Becoming withdrawn – lack of self-esteem.
- Lack of sleep.
- Alcohol or substance misuse.
- Changes in behaviour.
- Inappropriate behaviour for age.
- Harmful towards others.

Additionally vulnerable groups to peer-on-peer abuse

- Those aged 10 and upwards.
- Girls and young women are more likely to be harmed and boys and young men more likely to have harmed.
- Black and minority ethnic children/young people often under identified as having been harmed and over-identified as having harmed others.
- Children/young people with intra-familial abuse in their histories or those living with domestic abuse.
- Children/young people in care and those who have experienced loss of a parent, sibling or friend through bereavement.
- Children/young people who have harmed others can be younger than their victims.

It is important to remember that as with all safeguarding issues, peer on peer abuse can impact on children and young people without these characteristics. It is therefore important to look at interlinking factors and not isolated incidents.

What we can do

- Follow TMC's code of conduct and ensure all children and young people are supported and know their rights.
- Understand your local community and the context in which children and young people are growing up.
- Ensure children/young people know the risks – where appropriate, talk about peer-on-peer abuse in an age-appropriate way.
- Ensure those working with children and young people understand the impact of peer/child on child abuse on children/young people's mental health as well as the additional needs/vulnerabilities of children/young people with special educational needs or disabilities, who identify as lesbian, gay, bisexual and/or transgender; and/or have other perceived differences.

¹ Taken from <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse/>

- Where appropriate, check children/young people have safe relationships – in their family, with their peers and with your staff. Create the environment where it is OK to talk, even about the most difficult things.
- Spot the signs and know what to do – use the checklists above and be confident to raise peer on peer/child on child abuse as a possibility.

Historical or Non-Recent Child Abuse

Historical child abuse, sometimes referred to as non-recent child abuse, is when a child or young person experienced abuse when they were younger, or historically, that may or may not have been disclosed at the time. Because of the groups of children and young people we work with, hearing about historical child abuse is unfortunately common. This may be abuse that occurred prior to them coming into the care system, or abuse that took place whilst they were under a Child Protection Plan for example. It's important we know what to do when a child or young person discloses historical abuse.

We advise, that if a child or young person discloses or talks about historical abuse, that you respond in the same way you would if it was a disclosure of recent abuse and that you follow our normal reporting procedures as referenced on page 7. As part of this, we ask you to inform one of TMC's Designated Safeguarding Officers immediately. The DSO will then follow this up with the relevant parties to ensure that they are aware of this historical abuse and to take further action if needed. Whilst it may be that Children's Services are already aware of the historical abuse, it's important we share this information in the event that professionals are not aware and further action is required.

Handling a disclosure

It is possible that a child or vulnerable adult who is suffering, or has suffered abuse, will disclose to a The Mighty Creatives representative or member of staff. It is vital that the adult receives the full information. This is something that everyone should be prepared for and must handle carefully. The following action should be taken:

- Remain calm and in control ("I can help") but do not delay acting.
- The child or vulnerable adult should be reassured ("You've done the right thing sharing").
- Listen carefully to what is said. Allow the child or vulnerable adult to tell the story at their own pace and ask questions only for clarification. Do not ask questions that suggest a particular answer.
- Do not promise to 'keep it a secret.' The first opportunity should be taken to say that this information will have to be shared with others. It should be made clear that only people who need to know will be told and they should be able to help ("We might need to ask someone for help in dealing with the matter").
- The child or vulnerable adult should be told what is going to happen next.

- Notify a designated safeguarding lead at The Mighty Creatives and the designated safeguarding lead at the school/setting. It is that person's responsibility to liaise with relevant authorities, usually social services.
- In confidence, you should notify your line manager immediately that you have been disclosed to (not the details of the disclosure), so that you can be offered support.
- As soon as possible a note for record (see appendix c) should be made of what was witnessed as well as the response. Do not do this when with the child. Note the date, time, and any names that were involved or mentioned, and who the record was given to. Sign and date the record.

Remember not all disclosures are obvious. Some children and vulnerable adults will be too frightened to directly disclose abuse but will make hints and even jokes to try and make an appropriate adult aware of the issue.

The Safeguarding Briefing sets out the process to be followed by staff when they have concerns about a child.

Where allegations of abuse are made against a member of staff

Rights and confidentiality

If a complaint or allegation is made against a member of The Mighty Creatives staff, they should be made aware of their rights under both employment law and internal disciplinary procedures. This is the responsibility of the Business Manager, Chief Executive or Chair of Trustees, as required. Both the alleged abuser and the person who is thought to have been abused have the right to confidentiality under the Data Protection Act 2018. In criminal law the Crown or other prosecuting authority must prove guilt and the defendant is presumed innocent until proven guilty.

Complaints against a representative will always and without exception be investigated. Where there is a complaint against a member of staff there may be three types of investigation:

- A disciplinary or misconduct investigation
- A child protection investigation
- A criminal investigation

Internal enquiries and suspension

In the event of an accusation of abuse being made against a The Mighty Creatives member of staff, following advice by the police and pending further investigations, the individual accused may be suspended. The temporary suspension of a The Mighty Creatives member

of staff in no way implies guilt or innocence. It is a measure intended to protect and reassure both staff and children.

Please note that The Mighty Creatives Whistleblowing Policy applies to child protection matters.

Disclosure and Barring Service checks

The Mighty Creatives Disclosure and Barring Service Policy outlines the policy and procedures for when Disclosure and Barring Service (DBS) checks are made. A central register is held.

When we DBS check

An Enhanced DBS, with a children's barred list check, will be required for all 'regulated' activity, such as any regular unsupervised teaching, training, supervision or guidance working directly with children, young people and vulnerable adults.

Contractors who work with TMC and directly with children, young people and vulnerable adults (for example as Creative Mentors) will all require Enhanced DBS Checks and preferably be part of the DBS Update Service. If a contractor is not registered with the DBS Update Service an Enhanced DBS Check provided by the contractor or another organisation, will only be accepted if the date of certification is within twelve months prior to the contract start date at TMC. If the date of certification is more than twelve months and the contractor is not registered with the DBS Update Service a new DBS check will be required prior to commencement of any work.

A standard DBS check will be required where all regulated activity criteria are met **apart** from the number of times the activity is carried out in a month.

If contractors who work with TMC are not carrying out regular, unsupervised work with children and young people, they will not need a DBS check.

At the current time, all TMC staff have an Enhanced DBS, and this will be monitored regularly. Decisions about when we DBS check will be made on a case-by-case basis and regularly reviewed.

Contracted organisations and individuals

All contractors, e.g. freelancers, consultants, and organisations in receipt of grants or contracts, must sign up to following statement:

If the activity involves work with children, young people, or vulnerable adults ("vulnerable people" aged 18 and under or people who need or may need community care services because of mental or learning disability, other disability, age, or illness, and who are, or may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation), you must

take all reasonable steps to ensure their safety. You must have an appropriate written policy and set of procedures in place at all times to safeguard vulnerable people. This will include procedures to check backgrounds and disclosures of trustees, employees, volunteers, or contractors who will have significant direct contact with vulnerable people with the Disclosure and Barring Service. You must make a copy of your policy and procedures available to us upon our written request.

What we do if we receive a positive DBS disclosure

The Mighty Creatives will make direct contact with the individual, or with the organisation's project manager, as required. The purpose of this conversation is to assess any risks attached to the individual involved working with children and young people or vulnerable adults. The conversation will also reinforce our processes and the next steps that will be taken.

It may be necessary for The Mighty Creatives and or the individual and or organisation to seek advice from Nacro. They will be able to advise whether the conviction is seen as 'spent,' offer advice on how much information to disclose at what stage and give clear guidance as to what your responsibilities are and issues relating to confidentiality.

With lead responsibility for child protection and as a designated safeguarding lead, the Business Manager will be informed of the situation, but at this stage does not necessarily need to know who the individual concerned is.

Who would we talk to next

Depending on the nature of the work to be completed, The Mighty Creatives may be required to inform the relevant partner organisation where any work is due to take place, this could include schools, other education settings, residential homes. These discussions would be with the relevant **designated safeguarding lead only** to share the contents of this disclosure. A discussion must be had with the individual concerned to make them aware of this and to discuss how they would like to handle the situation. It may be that this might take more than one meeting as the individual may wish to be consulted as to how much detail is revealed and at what point. If the individual is not then allowed to commence the work, following guidelines in the Rehabilitation of Offenders Act, the designated officer must meet with the individual concerned so they have a chance to state their case prior to a final decision being taken.

It is the designated safeguarding lead's decision as to whether the individual can work in their setting. Based on The Mighty Creatives knowledge of the offence and individual, we can choose to recommend to the setting whether we feel the conviction is relevant and will do our utmost to ensure that we do this in an anti-discriminatory manner. Details of the disclosure will be handled with discretion and through appropriate decision-making channels.

If the individual chooses to withdraw from the project, all paperwork relating to that person and their disclosure must be returned to them or destroyed.

The Disclosure and Barring Service

For enquiries about DBS checks and process please contact The Mighty Creatives Business Manager on 07889 645112.

The Mighty Creatives uses Aarons Department for the processing of DBS checks.

All concerns, and allegations of abuse will be taken seriously by trustees, staff and volunteers and responded to appropriately - this may require a referral to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees, and other volunteers, and in emergencies, the police. For LADO contacts follow [this link](#).

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the police immediately by calling 999.

The Safeguarding Briefing sets out the process to be followed by staff when they have concerns about a child.

NSPCC: 0808 800 5000

Training and professional development

All new trustees, staff and volunteers will be introduced to The Mighty Creatives Safeguarding Policy and procedures as part of the induction process. Staff receive a safeguarding briefing within their first 2 weeks. Volunteers will receive a safeguarding briefing prior to them undertaking any work with us. Trustees will undertake child protection training within their first 6 months and staff and volunteers within their first 2 months. Once a year The Mighty Creatives will deliver internal child protection briefings for all staff based on needs, updates on policy and practices and changes in legislation. Annually, trustees, staff and volunteers will be offered refresher training.

Creative Mentor Induction and Training

Our Creative Mentors undergo robust recruitment and induction procedures to ensure that they are well informed and equipped to deal with any safeguarding queries and disclosures. After successful recruitment, Creative Mentors undergo TMC's bespoke Safeguarding training as a compulsory part of their induction training programme. If they do not have a recent Safeguarding qualification from an approved provider (Local Authority, NSPCC, Virtual College or otherwise), they will also be asked to undertake training provided by NSPCC as an Introduction to Child Protection. They have annual Safeguarding briefings in the Autumn to provide ongoing support.

Our Creative Mentors also have a rich annual training programme informed by social pedagogy and Trauma Informed Practices, as well as access to Group and 1:1 Professional Supervision provided by Local Authority Educational Psychologists to support them in their role on an ongoing basis. This programme is responsive and shaped on the current needs of the Creative Mentors.

Collection, storage, and use of personal information

Informed consent must be given by young people for The Mighty Creatives to collect, store and use their personal details. Only necessary data should be collected when:

1. meeting young people for first time at event or via a website enquiry – initial contact
2. young people are taking part in activity – active engagement

Personal information about young people is kept digitally on our Salesforce CRM, with access restricted via user permissions. There may be occasions when some personal information about young people is kept outside of our Salesforce CRM, in which case they must be kept digitally in a central password protected folder on SharePoint. Personal information should not be held in hard copy, on individual laptops, communications devices, or open folders on SharePoint. One exception is when young people are asking part in a project and contact details (name, email, phone number) are required to directly contact individuals. In this instance contacts can be held in Outlook and must be deleted at the end of the project.

Data is reviewed, deleted or renewed every two years. Data will only be held once a young person is contacted, and consent given again to continue holding information whilst ensuring that it remains accurate and up to date.

Consent: participation, photography, and filming

Written consent from a parent or person with legal parental responsibility must be given for a child or young person to do the following:

- Be photographed or filmed if under 16
- Use ICT and internet equipment if under 16
- Take part in engagement activity if under 16

Use of photographs and videos

- Parents and legal guardians of children and young people will be asked to give their permission for photographs and filming to be taken

- Parents and legal guardians of children and young people must give prior written permission for the use of any photographs and video
- Images will not be identified with the child or young person's name unless specifically agreed.

The following guides/templates must be used:

- Photo Consent Guide
- Photo Consent Form Individual
- Photo Consent Form Group
- Contact Data Consent Form
- Participation Consent Form

Online safety

Because of the increased dangers faced by children online, online safety is reflected in this policy, covered comprehensively in the Digital Policy, and delivered in staff training. The Digital Policy is aligned with the Data Protection Policy.

Based on the systems we have in place in addition to the commissioning of new systems, we will ensure that appropriate filtering and monitoring systems are in place. Because we recognise that no filter can block all undesirable material, we take a whole organisation approach that is best practice with regards to online safety. The Digital Policy covers all aspects of company related marketing, information technology and internet activity.

With regards to online safety and child protection, the following sections cover social media, the website and microsite.

We will use guidance provided by the UK Safer Internet Centre and will do what is appropriate in terms of The Mighty Creatives services, products, and marketing to ensure that filtering and monitoring measures taken are proportionate to the risk.

We will signpost for parents and professionals through our website to relevant resources on NSPCC and Child Exploitation and Online Protection Centre (CEOP) websites and include the CEOP reporting button on our website.

Social media

- The data protection officer is responsible for the Digital Policy and Action Plan. The corporate and project use of social media tools are included in this policy in addition to use of IT equipment

- The Mighty Creatives staff, trustees, volunteers or freelancers are never allowed to accept as a “friend” a child, young person, or vulnerable adult they are or have worked with through The Mighty Creatives
- If social media is planned for use in a project or activity, a plan and risk assessment should be developed and shared with the lead designated safeguarding officer, prior to initiating.
- The Mighty Creatives contact details will always be included on social media sites so that any issues or concerns can be reported directly to The Mighty Creatives
- Any concerns regarding content generated by users on social media sites linked to The Mighty Creatives should be reported to the data protection officer.
- Online concerns can also be reported immediately to the CEOP.

The Mighty Creatives **website and Mighty Gallery and My Creative Track online**

- Children are advised that they should protect their own privacy online, The Mighty Creatives website and microsite includes The Mighty Creatives Privacy Statement
- The Communications & Marketing Manager is responsible for the team that administers The Mighty Creatives website and microsite in adherence to this policy.

Glossary of terms

CEOP is a law enforcement agency to help keep children and young people safe from sexual abuse and grooming online. <https://www.ceop.police.uk/safety-centre/>

Designated Safeguarding Lead is named person for safeguarding children and young people. The designated safeguarding lead has a responsibility at both a strategic level within the organisation and on a day-to-day basis.

Local Authority Designated Officer is an identified role in local authorities (referred to as the LADO) to be involved in the management and oversight of individual cases of allegations of abuse made against those who work with children.

NACRO is a national social justice charity with more than 50 years’ experience of changing lives, building stronger communities, and reducing crime. <https://www.nacro.org.uk>

NSPCC is a national charity campaigning and working in childcare in the United Kingdom and the Channel Islands. <https://www.nspcc.org.uk>

UK Safer Internet Centre is a partnership of three leading organisations: SWGfL, Childnet International and Internet Watch Foundation whose mission is to promote the safe and responsible use of technology for young people.

Appendix A Types of Child Abuse

- **Physical Abuse** - may involve hitting, shaking, throwing, poisoning, burning/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.
- **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 or 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 or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve 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.
- **Sexual Abuse** and child sexual abuse within the family (CSIF) 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 or 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 is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.
- **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. It may include a failure to:
 - Provide adequate food, clothing, and shelter.
 - Protect a child from physical and emotional harm or danger.
 - Ensure adequate supervision (including the use of inadequate caregivers); or
 - Ensure access to appropriate medical care or treatment.
 - Respond to a child's basic emotional needs

- **Bullying** and forms of bullying on and off line including prejudice based and Cyber Bullying is also abusive which will include at least one, if not two, three or all four, of the defined categories of abuse **[cross reference /refer to School Bullying Policy and similar other policies]**.

Appendix B Indicators of Child Abuse

Physical Abuse

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks, or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home.

Emotional Abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress.

Sexual Abuse

It is recognised that there is underreporting of sexual abuse within the family. School / College all staff and volunteers should play a crucial role in identifying / reporting any concerns that they may have through, for example, the observation and play of younger children and understanding the indicators of behaviour in older children which may be underlining of such abuse.

All Staff and volunteers should be aware that adults, who may be men, women, or other children, who use children to meet their own sexual, needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down

- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults.

Neglect

It can be difficult to recognise Neglect, however its effects can be long term and damaging for children.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from other children.
- Losing weight or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

ENDS.