

Safeguarding and Online Safety Policy

Table of Contents

POLICY STATEMENT	2
POLICY AIMS	2
KEY TEXTS	3
WHAT IS SAFEGUARDING?.....	3
WHAT IS CHILD PROTECTION?.....	3
SAFEGUARDING AT THE INSTITUTE OF IMAGINATION	4
NEW STARTERS	4
TRAINING.....	4
POLICY UPDATES.....	4
RECRUITMENT OF STAFF AND VOLUNTEERS.....	5
DBS REQUIREMENTS.....	6
FIRST AID.....	7
PARTNER ORGANISATIONS.....	7
LOST OR UNACCOMPANIED CHILDREN.....	8
UNACCOMPANIED ADULTS	8
ONLINE SAFETY ROLES AND RESPONSIBILITIES	9
EDUCATION & TRAINING – STAFF AND FREELANCERS	11
DEALING WITH INCIDENTS WITH UNSUITABLE/INAPPROPRIATE ACTIVITIES.....	12
SCHOOL AND EDUCATION VISITS.....	13
BEHAVIOUR MANAGEMENT	14
POSITIVE HANDLING AND TOUCH.....	14
RECORDS MANAGEMENT	14
OTHER SAFEGUARDING CONCERNS.....	15
CONTACT DETAILS	15
PROCEDURES.....	15
WITNESSING ABUSE	16
REPORTING SAFEGUARDING CONCERNS	17
ALLEGATIONS OF ABUSE AGAINST IOI STAFF.....	18
DISCLOSURE OF ABUSE	18
WHISTLEBLOWING	19
CRISIS COMMUNICATIONS.....	20
APPENDIX ONE: TYPES OF ABUSE AND POSSIBLE INDICATORS	21
APPENDIX TWO: SAMPLE SCENARIOS.....	22
APPENDIX THREE: PROCEDURE OF COMMUNICATIONS.....	25

APPENDIX FOUR: RESPONDING TO INCIDENTS OF MISUSE ONLINE.....	26
APPENDIX FIVE: INCIDENT REPORT FORM.....	27
APPENDIX SIX: CRISIS COMMUNICATIONS.....	29
APPENDIX SEVEN: SIGNS OF RADICALISATION.....	31
APPENDIX EIGHT: SIGNS OF FEMALE GENITAL MUTILATION.....	32

Policy Statement

The Institute of Imagination (iOi) recognises its responsibility to ensure that a safe environment is provided for all children and vulnerable adults taking part in its activities. This policy specifies how we will provide a safe environment and protect children and vulnerable adults while they are taking part in iOi experiences both in person and online. It also aims to protect iOi staff, freelancers and volunteers (referred to collectively as ‘staff’ throughout this document) from situations where they may feel threatened or open to suspicion or accusation. Furthermore, it provides procedures for dealing with situations where abuse or inappropriate behaviour is witnessed by or disclosed to staff. We also share how we will develop, monitor and review online safety and how iOi staff, freelancers and volunteers understand and commit to the online safety protocols and procedures.

It is the responsibility of individual members of staff, freelancers and volunteers to understand the content of this policy, to ensure that it is followed, and to report any breaches of policy to the Designated Safeguarding Lead in the first instance. Safeguarding is the responsibility of everyone.

iOi considers itself a safe space for all children, whatever their race, religion, ability, gender, social status or any other differing factor. All children will be treated fairly and equally at iOi experiences.

Children have the right to express themselves and to share information, provided that it is not damaging to themselves or to others. iOi aims to give them this freedom at our experiences and we endeavour to give them the tools to do so. iOi also aims to use a proactive approach to behaviour management with children, working closely with schools from the outset to ensure that iOi experiences can be delivered at the highest possible standard.

Children have the right to relax and play and join in a wide range of cultural, artistic and other recreational activities. iOi aims to support this by continually programming new and diverse activities, in which all children of all ages and abilities can participate. The iOi aims to, wherever possible, consult children when making decisions regarding programming. The iOi will endeavour to provide experiences where children can play, discover, experiment and learn in a safe environment.

Policy Aims

- To ensure children find a safe and enjoyable place at iOi experiences.
- To develop a consistent approach across all iOi activity in dealing with safeguarding issues.
- To inform staff about iOi’s responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.

“The support and protection of children cannot be achieved by a single agency...Every service has to play a part. All employees must have placed upon them a clear expectation that their primary responsibility is to the child and his or her family.”

Lord Laming, Victoria Climbié Report.

This policy covers the following iOi activities:

- Recruitment of iOi staff, freelancers, volunteers and partners.
- iOi experiences where staff, freelancers or volunteers come into direct contact with children or vulnerable adults.
- How to approach safeguarding and child protection at iOi experiences.
- What we expect from all staff working at iOi, including partner organisations.

For the purposes of this policy:

- Children are defined as young people under the age of 18.
- Vulnerable adults are defined as people over the age of 18 who are or may be in need of community care services because of age, illness, physical or learning disability, or those who are unable to take care of or protect themselves against harm or exploitation (including those for whom English is a second language).
- Responsible adults are defined as people over the age of 18 who assume responsibility for children or vulnerable adults during iOi activity (e.g. teachers, parents, guardians and group leaders). However, we recognise that some parents may be under the age of 18 and will be responsible for their children while at an iOi experience.
- iOi staff encompasses core staff, freelancers and volunteers working on iOi experiences.

Key texts

This policy has been developed in accordance with the principles established by the Children Act 1989 & 2004, and in line with the following:

- Working Together to Safeguard Children (2018).
- Keeping Children Safe in Education (2021).
- Information Sharing – advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers (2015).
- What to do if you're worried about a child being abused (2015).
- Statutory Framework for the Early Years Foundation Stage (2014).
- Local Safeguarding Children Board and Advisors.
- Special educational needs and disability act 2001.
- Counter Terrorism and Security Act 2015 (Section 26).

What is Safeguarding?

Safeguarding is defined as the process of proactively protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best life chances.

What is Child Protection?

Child Protection forms part of a suite of documents and policies, which relate to safeguarding responsibilities. It refers distinctly to children at risk of harm. Child protection aims to keep children safe, and where there is serious risk of harm, removing a child from risk or risk from the child. Child protection is reactive and responsive to situations that occur, that safeguarding aims to prevent.

In particular, safeguarding measures within this policy should be considered in conjunction with the clauses: **iOi Code of conduct, Recruitment of Staff & Volunteers, Behaviour Management, Anti-Bullying and Photography and Media.**

Safeguarding at the Institute of Imagination

Who are the key contacts at iOi?

It is important to reinforce that all staff are responsible for safeguarding at iOi experiences and activities. We expect all staff to be vigilant.

Designated senior persons for supporting staff and ensuring rigorous referral management, training and safeguarding procedures across the charity are:

Nileema Yesmin, Programmes and Content Manager (Designated Safeguarding Lead) and **Tom Doust**, Associate Director (Designated Safeguarding Lead). These persons should be the first port of call when any safeguarding concerns arise.

Martin Allen Morales, in his role as Chief Executive, should be kept informed of any incidents or concerns and receive any reports.

All **iOi Trustees** have responsibility to annually review safeguarding-related policies and procedures that operate across the charity. They also have a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements.

New Starters

Facilitators or staff working directly with children as their main job role must read this policy and complete online safeguarding and child protection training before they work with children.

All other new starters are asked to read this policy on their first day of work and must also complete these courses within their first month of work or before they begin working directly with children.

New starters must sign a copy of this policy to prove that they have read it and this will be kept in their HR file.

Training

iOi is committed to providing safeguarding training to all staff annually. Key staff (i.e., named Designated Safeguarding Leads) will receive advanced safeguarding training and all other staff will complete online training with EduCare. After their first year of completing their safeguarding training, all staff, including Freelance Facilitators who hold ID Building Passes, will complete an annual refresher if appropriate or the full course again if no refresher is available. All staff will also complete School 360's Training and Quiz.

Volunteers must read this policy before volunteering with iOi and will receive a safeguarding briefing at each experience and workshop they attend.

Policy Updates

iOi commits to updating this policy annually. It is also saved on the iOi file server. Staff and Trustees will be informed of policy updates when they occur.

The development and monitoring of the policy with the iOi is taken place through a range of formal and informal meetings.

Schedule for Development, Monitoring and Review

This Safeguarding and Online Safety Policy was approved by the Board of Trustees.	June 2023
The implementation of this online safety policy will be monitored by the Designated Safeguarding Lead.	Nileema Yesmin
Monitoring will take place at regular intervals and reviewed twice a year	6-month review
Laura Watson (Lead Safeguarding Trustee) will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents should they occur) before Board meetings.	Annual Review
The online safety policy will be renewed annually. In the light of significant developments in the use of technologies, new threats to online safety or incidents that have taken place, it may be reviewed and renewed more regularly.	12-month review in June 2024
Should serious online safety incidents take place, the following external agencies will be informed.	Local Authority Designated Safeguarding and/or The Police

The iOi will monitor the impact of the policy using:

- Logs of reported incidents.
- Records of online sessions.
- Both of these will be on the server under a password protection.

Recruitment of Staff and Volunteers

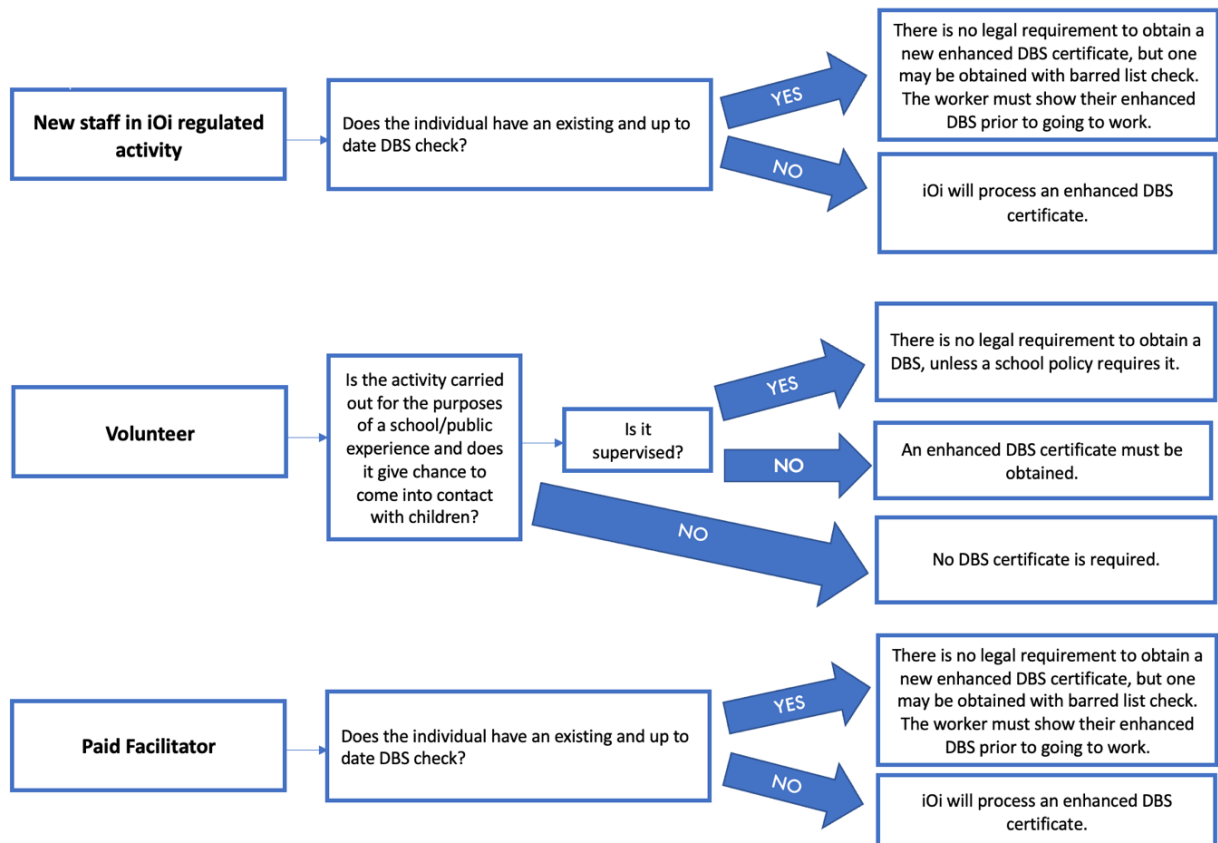
iOi requires all staff that are in regulated activity with children to complete an Enhanced DBS check on or before their first day of work with iOi and annually thereafter. Where the individual has signed up to the DBS Update Service, with their consent, the iOi will carry out an annual status check of the individual's existing certificate, using the Update Service.

Any third-party organisations that the iOi commissions to deliver activities with children or vulnerable adults who will be in regulated activity with children are required to provide evidence that their employees have a recent (within the last calendar year) DBS check. This situation is unlikely as iOi, apart from in extraordinary circumstances, will be present at the activity in question.

Partners will be required to read and sign a brief overview of our policy and its key aims and objectives. Regular partners and volunteers will be required to complete a DBS check with the iOi.

The iOi uses the following flow chart of disclosure and barring service criminal record checks and barred list check for each employee, freelancer and volunteer they work with.

DBS Requirements



First Aid

All children and young people have the right to feel safe and know that they will be attended to with care when in need of first aid. At every experience or workshop, iOi has a designated and qualified first aider who is responsible for providing first aid in the experience of an accident. The designated first aider should be stated at the start of the experience to all staff present.

If an accident, illness or injury occurs, the person who witnesses this should immediately call the iOi First Aid officer or host/visiting school first aider and allow them to deal with the situation. They should assist the first aider and if they are different persons, inform the lead iOi person for the experience.

Only a qualified first aider should administer first aid.

Use of mobile phones, photographs and video

It will frequently be the case that photographs, and videos are taken of children and vulnerable adults participating in public experiences and learning workshops and that these images will be used for publicity purposes.

When running workshops in person or online, iOi will not allow images of children to be used on the Institute of Imaginations websites, publicity, social media or press releases, without express permission from the school and/or the parent/carer, in line with the school's policy. If we do obtain such permission, the individual children featured will not be identified by name. Consent forms are kept on the iOi file server that must be completed by the relevant parent/teacher/carer and once completed these forms are saved in perpetuity on the iOi server.

At public iOi experiences where filming and photography is taking place, there will be clear signs stating this throughout the experience. iOi will not assume permission to use images but will gather individual consent forms from parents/carers when taking recognisable images of children. When using these photos, names of children will not be used unless express permission to do so has been obtained, for example when announcing a competition winner.

When permission is obtained, the iOi will use an organisation device e.g., phone or tablet. Personal phones should not be used to take photos or videos. Volunteers are briefed on this before any activity begins.

A member of iOi staff should challenge anyone who appears to be taking photographs or videos in inappropriate circumstances. The iOi staff member should have reasonable grounds for suspicion.

Partner organisations

The iOi runs public experiences on occasion, which can have partner organisations running workshops together with the iOi. Before these experiences, we require organisations to complete a booking form and we request DBS numbers or certificates. If practitioners from partner organisations will be running regulated activity, without a member of iOi staff present, they will be required to present a DBS certificate. Partner organisations should also supply an individual risk assessment prior to every experience, and we will send them an overview policy in advance of any public experiences.

iOi will also complete a risk assessment for each individual public experience.

Lost or unaccompanied children

At in person iOi experiences, we recognise that there is a risk of lost or unaccompanied children. At the briefing before the experience starts, a meeting point will be communicated to the whole team. This will be at the reception area unless otherwise stated. If a lost child is discovered during the experience, a DBS checked member of iOi staff should accompany the child to this point. A staff member with a DBS check will remain with the child until their parent/carer can be found.

If a child is reported as lost, then a discreet announcement using the code sentence, '**Mrs Tinker please come to the main reception**' will be made. iOi will take a full description of the child and contact details of the parent/guardian. We DO NOT share their name or description with members of the public who may be aware of the situation. Staff will then search for the child. If a lost child under the age of 13 is not found within 20 minutes the police should be called to notify them of the situation.

Unaccompanied adults

Unaccompanied adults are not encouraged at iOi experiences, which are designed for children and families to attend together. Visitors to an iOi experience are asked to sign in with the iOi Team and will wear a visitor lanyard throughout their visit. They will always be accompanied by a member of iOi staff.

Technology

Tablets and other technology are used throughout and are essential to iOi's work. To prevent unattended Internet access, restricted access is used on all iOi iPads and computers during public experiences.

Online Safety Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within The Institute of Imagination when working with audiences online:

Board of Trustees

- The Board of Trustees are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out by an appointed member of the Board of Trustee who will receive updates and information about online safety incidents and monitoring reports. Laura Watson is the Lead Safeguarding Trustee. This is reviewed annually.

The role of the Safeguarding and Online Safety Trustee will include:

- Meeting up to four times a year with The Designated Safeguarding Lead and the Associate Director of iOi.
- Up to date training and monitoring of the policy.
- Monitoring of safeguarding incident logs.
- Reporting to the Board of Trustees.
- The Lead Trustee has a duty of care for ensuring the safety (including online safety) of children, young people and families. The day-to-day responsibility for online safety will be delegated to the Designated Safeguarding Lead.

The Designated Safeguarding Lead and the Executive Director of the iOi should be aware of the procedures that must be followed in the experience of a serious online safety allegation being made against a member of staff (see flow chart on dealing with online safety incidents – **Appendix Five – page 25** “Responding to incidents of misuse online”.)

Martin Allen Morales in his role as Chief Executive should be kept informed of any incidents or concerns and receive updated reports.

The Designated Safeguarding Lead and the Executive Director of the iOi are responsible for ensuring that all staff (full-time, part-time and freelance) receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.

The Designated Safeguarding Lead will ensure that there is a system in place to allow for monitoring and support of those in the organisation who carry out online sessions, in order to ensure that best practice is being applied to their sessions.

The Executive Director of the iOi will receive regular monitoring reports from the Designated Safeguarding Lead. They will report to the designated supporting Trustee.

Designated Safeguarding Lead

- Leads the Online Safety work within the organisation.
- Takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the organisation’s online safety policy and relating documents.

- Ensures that all staff are aware of the procedures that need to be followed in the experience of an online safety incident taking place.
- Ensures workshop plans align with the online safety guidelines.
- Provides training and advice for staff.
- Liaises with the Local Authority, MAT, Police or relevant body (Multi-Academy Trust?).
- Receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.
- Keeps up to date with online safety technical information in order to effectively carry out the role and informs and updates others as relevant.
- Meets regularly and reports with Executive Director of the iOi to support on reporting for Board meetings to discuss current issues, review incident logs.
- Should be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues to arise from:
 - Sharing of personal data.
 - Access to illegal/inappropriate materials.
 - Inappropriate online contact with adults/strangers.
 - Potential or actual incidents of grooming.
 - Online-bullying.

iOi Staff and Facilitators

Are responsible for ensuring that:

- Prior to running an online session iOi staff must ensure they have an up-to-date awareness of online safety training including the privacy and permission settings and of the current organisational online safety policy and practices to safeguard participants.
- They have read, understood and signed the iOi staff acceptable use policy/agreement for online safety.
- They report any suspected misuse or problem to the Designated Safeguarding Lead and Executive Director of the iOi who will investigate action or sanction.
- All digital communications with young people and families should be on a professional level and only carried out using online meetings (guideline below).
- Online safety issues are embedded in all aspects of the workshop plans and other activities.
- Young people and families understand and follow the Online Safety Policy and acceptable use policies (guideline below).
- We have parental, teacher or partner consent to authorise a group or an online session to be set up. This can be done through a partner organisation that has agreed consent with parents or through iOi consent forms online or in paper form. This includes taking photos of activity relating to the workshops.

iOi will use Zoom, Microsoft Teams, Google Hangouts and WhatsApp as digital platforms for teachers, children/young people and families participating and engaging in online learning. WhatsApp will only be used with parents and not with children and young people.

Online Platforms

Zoom/Microsoft Teams/Google Hangouts/Streamyard

iOi staff will:

- Ensure that all meetings are password protected and private (using a paid account).
- Ensure that attendees of meetings don't join before the host, setting up a waiting room for participants.
- Ensure that there is one person managing the room and one additional person hosting the session.
- Ensure there is a register of expected attendees and sign-ups for the experience who are checked against this as individuals enter.
- As participants join an online experience, greet them by asking to have their camera and microphone on and use this moment to check their names and identity against the register. Note that some children may be registered under their parents' name. If they are not on the register, ask your co-host to put them in the waiting room and ask your co-host to confirm their identity through the chat function.
- Ensure that ground rules for using any platform are agreed with participants before beginning experience including people taking photos of other people within the session.
- Ensure that there is consent to take any images or screen shots prior to taking them.
- Ensure the host is in control of who can control the screen, save the video and chat content.
- Be conscious of background environments and others in the room.
- Be conscious of the content that participants will be making and how to pick up on safeguarding concerns E.g., If child writes or describes a safeguarding concern that may be happening in the home through story telling.
- Remind users about respecting other participants and using the chat box for commentary.
- Dress and talk appropriately.
- Avoid having only one facilitator in the session.
- Ensure that when recording video during the session, we let our audience know at the beginning of the session, alerting them to when we are beginning a recording.
- Ensure that when working with a partner organisation, they will have overall consent of the parent or young person. The partner will need to be present within the meeting.
- Ensure that facilitators learn how to mute and unmute all participants, including video screens.

WhatsApp

The purpose of a WhatsApp group is to engage with parents, carers and adults only to provide information about a programme. This is not an engagement tool for children and young people.

WhatsApp groups must be managed and overseen by an iOi member of staff. WhatsApp groups must be monitored by a second member of iOi staff to ensure the channel is being used correctly.

Education & Training – Staff and Freelancers

It is essential that all iOi staff and freelancers receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

A planned programme of formal online safety training will be made available to staff through EduCare services to complete Online Safety Module (two parts).

All new staff should receive online safety training as part of their induction programme, ensuring that they

fully understand the iOi online safety policy and acceptable use agree.

The Designated Safeguarding Lead and Co Director Experience and Learning will receive regular updates through relevant organisations and review guidance documents released by those relevant organisations. This online safety policy and its updates will be presented to and discussed by iOi staff, at team meetings and in training sessions. The Designated Safeguarding Lead will provide advice/guidance/training to individuals as required.

Training – Trustee

A designated Trustee should take part in safeguarding, online safety training/awareness sessions. This may be offered in a number of ways:

- An online safety and safeguarding training will be made available to the designated trustee through EduCare services to complete an Online Safety module.
- Presently, Laura Watson is the Lead Safeguarding Trustee, and this will be reviewed annually.

Dealing with Incidents with unsuitable/inappropriate activities

It is hoped that all members of the iOi community will be responsible users of digital technologies and that they understand and follow the iOi policy. We hire and train all our staff on the premises that they commit to and work toward protecting and safeguarding children and young people at all times. However, there may be times when infringements of the policy could take place, through irresponsible or through deliberate misuse.

iOi believe that the activities referred to in the following section would be inappropriate in any workshop or online learning setting. The iOi policy prohibits the following acts:

- Cybercrime.
- Incidents of ‘grooming’ behaviour.
- The sending of obscene materials to a child or young person.
- Adult material which potentially breaches the Obscene Publications Act.
- Criminally racist material.
- Promotion of terrorism or extremism.
- Offences under the Computer Misuse Act 1990 (the act of accessing or modifying data stored on a computer system without appropriate consent or permission).
- Threatening behaviour, including promotion of physical violence or mental harm.
- Any other information or behaviour which may be offensive to staff or breaches the integrity of the ethos of the iOi values or brings the iOi into disrepute.

In the experience of suspicion, all steps in this procedure should be followed:

1. Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported. Involve the designated Trustee.
2. Conduct the procedure using a designated computer which can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
3. Ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).

Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used

for investigation. These may be printed, signed and attached to an incident form (except in the case of images of child sexual abuse).

Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:

- Internal response or disciplinary procedures.
- Involvement by Local Authority.
- Police involvement and/or action.
- If content being reviewed includes images of child abuse, then the monitoring should be halted and referred to the Police immediately.

Other instances to report to the police would include:

- Incidents of 'grooming' behaviour.
- The sending of obscene materials to a child.
- Adult material which potentially breaches the Obscene Publications Act.
- Criminally racist material.
- Promotion of terrorism or extremism.
- Offences under the Computer Misuse Act.
- Other criminal conduct, activity or materials.
- Threatening behaviour, including promotion of physical violence or mental harm.
- Any other information which may be offensive to staff or breaches the integrity of the ethos of the iOi values or brings the iOi into disrepute.
- Isolate the computer in question as best one can. Any change to its state may hinder a later police investigation. It is important that all of the above steps are taken as they will provide an evidence trail for the iOi and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed incident form should be retained by the iOi for evidence and reference purposes.
- Please refer to **Appendix 4 on page 25** for a flow chart guide on how to an incident of misuse.

School and Education Visits

At iOi school and education visits, a teacher must be present in the room at all times. This also applies when a school has come to an iOi space or event.

iOi education visits require a minimum ratio of 1 school staff member to 15 school children.

During any school visits to the iOi spaces, separate toilets will be used by children and iOi staff. A teacher or DBS checked facilitator will direct children to the iOi toilet and iOi staff. At experiences and workshops where children are not accompanied by an adult, it is important that iOi staff are aware of when children enter and return from the toilet.

Upon being booked to deliver a workshop with a school, iOi will send DBS certificates of all iOi staff that will be delivering the workshop to the school, if requested by the school.

As before, if tablets or laptops are provided by iOi for the workshop, these must be put onto restricted access to prevent unattended Internet access. We use a range of applications in workshops and on occasion restricted access will be lifted to allow access to all digital tools.

There should always be hard copies of the incident report form at iOi experiences, in case they are required.

Behaviour Management

All iOi activity that takes place within a school requires a booking form that allows the staff to prepare for the children and additional needs those children may have. iOi staff are encouraged to keep open communication with school staff in advance of all workshops, to ensure that needs are met.

iOi takes a proactive approach to working with schools and the public in order for children to get the best possible experience. We aim to work jointly with schools and the public to ensure behaviour management is managed appropriately.

Positive Handling and Touch

The Institute of Imagination understands the importance of listening to and respecting children to create a positive, supportive and engaging learning environment. The team may work with specific groups that have, social, emotional & behavioural difficulties, special educational needs and early years.

A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background.

This means that iOi staff should:

- Be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.
- Never touch a child in a way which may be considered indecent.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Never indulge in horseplay, tickling or fun fights.
- Any such contact should be agreed. Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible.
- Use a level of contact which is acceptable to the child for the minimum time necessary. E.g., a tap on the shoulder to get their attention.

Records Management

Reports regarding any matter or concern of safeguarding should be made by hand as soon as possible following the incident or experience. Any incident that causes concern to a member of iOi staff should be reported, using the incident report form template found at **Appendix Five**.

1. Alert the Designated Safeguarding Lead of the concern witnessed.
2. The staff member who witnessed the concern should write a safeguarding report by hand using the iOi incident report form template (see **Appendix Five**).
3. This should then be given to the Designated Safeguarding Lead. No copies of this document should be made, and it should not be sent electronically.
4. The Designated Safeguarding Lead should then discuss the report with the Executive Director and the Chief Executive. If the concern refers to either of these individuals, it should be discussed with the nominated trustee.
5. The report should be discussed with the relevant local authority and/or school.

6. The Designated Safeguarding Lead should follow up with the school or local authority.

Other Safeguarding Concerns

This section is to help iOi staff spot signs of these behaviours in children that they are dealing with during school education visits or public experiences.

Radicalisation

Radicalisation has become a pressing child protection issue and one that is unlikely to go away. It is inherently a secretive act, which can be hard to familiarise when a young person is subject to such a threat. iOi staff should familiarise themselves with the key indicators, in order to be able to flag any potential concerns that they see in a child and may take part in Online Prevent Training. Please refer to **Appendix Seven** for further information.

Female Genital Mutilation

Female Genital Mutilation is illegal in England and Wales and professionals should intervene to safeguard and protect girls and women who may be at risk of FGM or have been affected by it. iOi staff should familiarise themselves with the key indicators that would signal a girl has undergone, or is about to undergo, FGM. Please see **Appendix Eight** for further information.

Contact Details

Institute of Imagination

Designated Safeguarding Lead **Nileema Yesmin**

Designated Safeguarding Lead **Tom Doust**

Office: 0207 4949153

For email inquiries: hello@ioi.london

Newham Child Protection

Tel: 0203 373 4600 (9am – 5:15pm)

0208 430 2000 (other times)

Lambeth Local Authority Designated Officer Professionals' Line

020 7926 3100 Public Line 0207 926 5555 (24 hours) or 0207 9263344

Email: dutymanager@lambeth.gov.uk

Procedures

This section will deal with supporting staff

1. Witnessing abuse
2. Reporting safeguarding concerns
3. Allegations of abuse
4. Disclosure of abuse
5. Whistleblowing
6. Crisis communications

Witnessing abuse

Abuse in this context refers to any action by another person - adult or child - that causes significant harm to a child. It can be physical, sexual or emotional.

This section refers to when a staff member witnesses or views abuse taking place during a school workshop or public experience.

In this case, the staff member has seen the child being abused. If you think a child is in immediate danger - call the police on 999 or call the NSPCC on 0808 800 5000. Do this straight away, before anything else.

Following this, the staff member should:

1. Alert the Designated Safeguarding Lead of the abuse witnessed. This should be done as soon as possible following calling the police or NSPCC. Do NOT end a call with the police or NSPCC until you are certain of their outcome. i.e. they are coming to the school or experience and have given you instruction.
2. The staff member who witnesses the abuse should then complete an incident report form using the iOi template (see **Appendix Five**). While doing so, the iOi Designated Safeguarding Lead should inform the Chief Executive.
3. The staff member should then give this report to the Designated Safeguarding Lead and Chief Executive.
4. If necessary, the Designated Safeguarding Lead should then discuss the report with the Local Authority Designated Safeguarding Officer, and ensure the report is filed in a secure location at the registered office.
5. The Designated Safeguarding Lead or Chief Executive should follow up with the school or local authority where needed.
6. The Designated Safeguarding Lead or Chief Executive should continue to follow up until they are confident that the matter is being dealt with appropriately.
7. Please see **Appendix One** for signs of abuse and **Appendix Two** for potential scenarios.

Reporting Safeguarding concerns

When at a school workshop, we report all concerns about a child’s welfare, possible abuse or neglect, to the Designated Person for Safeguarding at the child’s school and you should follow the below procedure. Alert the iOi Designated Safeguarding Lead of the concern witnessed.

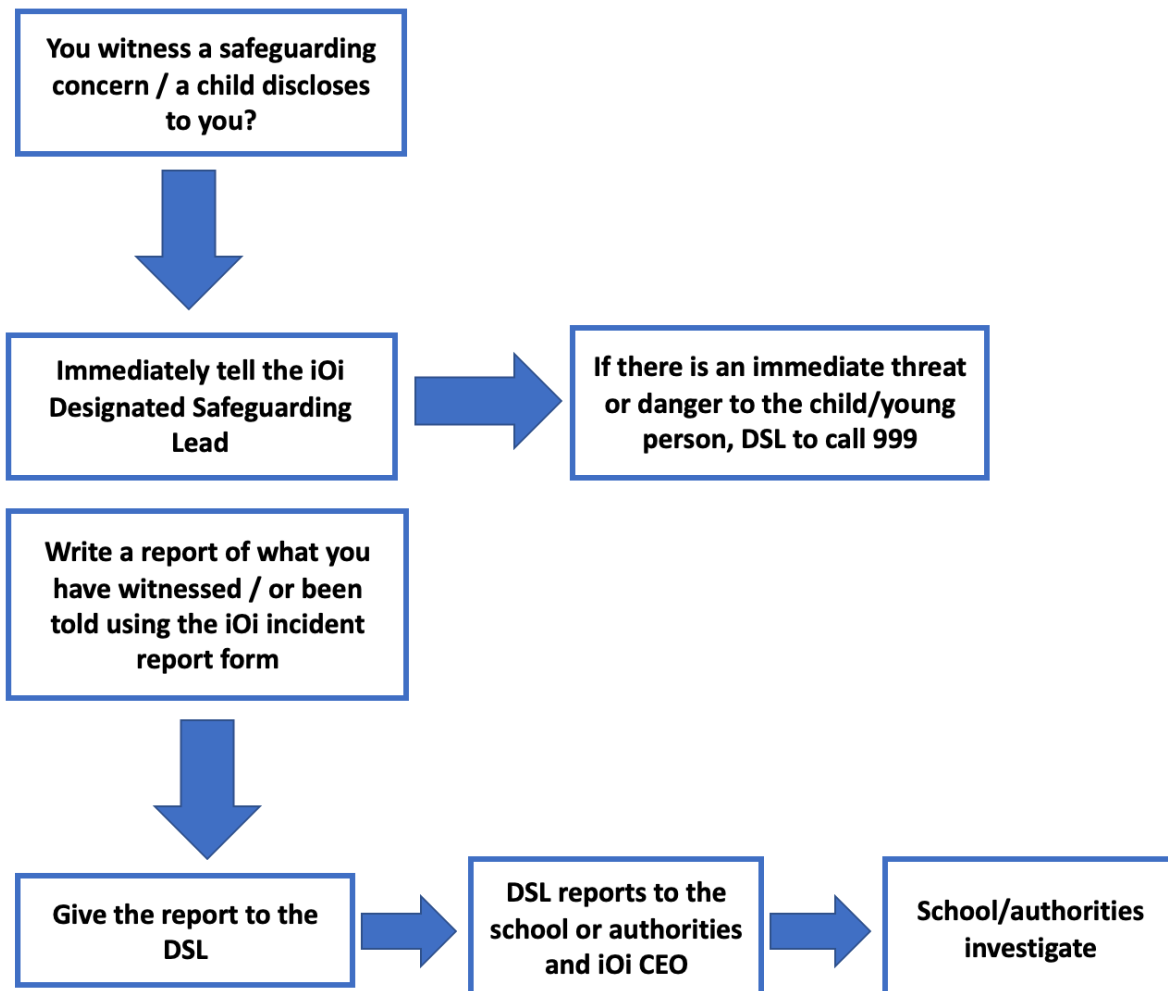
The staff member who witnessed the concern should complete an incident report using the iOi incident report template (see **Appendix Five**) and send by email using password protection on the document.

This should then be given to the iOi Designated Safeguarding Lead and Chief Executive.

The Designated Safeguarding Lead should then discuss the report with the Designated Person for Safeguarding at the relevant school and save the original in a secure location at the registered office.

The iOi Designated Safeguarding Lead or Chief Executive should follow up with the school.

If the concern for a child’s welfare is observed at a public experience, all concerns are reported to the relevant local authority. Efforts should be made to find out the child or parent/carer’s name. If this is not possible, give a detailed physical description.



Allegations of abuse against iOi staff

In the first instance, staff should not put themselves into a vulnerable position with children, for example by always conducting activities in full view of other colleagues and adults. School staff should be present at all times during school workshops and parents should accompany their children at all times during public experiences.

We understand that a child or young person may make an allegation against a member of iOi staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Designated Safeguarding Lead and the most senior member of staff available from the iOi.

Alert the iOi Designated Safeguarding Lead or the most senior member of staff available, if the LSO is not available.

The staff member accused should be removed from the activity immediately and the staff member receiving the allegation must complete a report using the format provided in **Appendix Five**.

The iOi Designated Safeguarding Lead will discuss the content of the allegation with the Local Authority Designated Officer before taking any action.

If the Designated Safeguarding Lead is implicated in the allegation in any way, the nominated trustee should be informed immediately, and they will communicate with the Local Authority Designated Officer. The iOi Designated Safeguarding Lead (or nominated Trustee) should then give the report to the Chief Executive and store it in a secure place in the registered office.

The procedure for disciplinary against staff should be followed as instructed in the iOi Team Handbook. Any suspension of a staff member requires careful consideration and consultation should be undertaken with the Local Authority professionals.

Disclosure of Abuse

What is disclosure?

Some incidents of abuse only come to light because the abused person discloses the information himself or herself.

The abused person may not understand that they are being abused and so not realise the significance of what they are telling you. Some disclosures happen many years after the abuse. There may be good reasons for this e.g., the person they were afraid of has left the setting. Therefore, any delay in an individual reporting an incident should not cast doubt on its truthfulness.

Never attempt to carry out an investigation of suspected abuse by interviewing the young person or any others involved. This is a highly skilled role and any attempts by you could affect possible criminal proceedings.

If you feel that a child or vulnerable adult is disclosing to you, use the following steps:

RECEIVE

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Listen quietly and actively, giving your undivided attention. Allow silences when needed. Do not show shock or disbelief but take what is said seriously.

REASSURE

Stay calm. Do not pass judgement and ensure that you empathise. However, never promise a child that you can keep the conversation a secret but do give reassurance that only those who need to know will be told. Make sure that you reassure the child that they were right to tell you.

REACT

React to the child only as far as is necessary for you to establish whether or not you need to refer the matter but do not interrogate for full details.

Do not ask leading questions but keep them open ended e.g., 'is there anything else you want to say?' Do not criticize the perpetrator; the child may have affection for him/her.

Explain what you will do next which is inform the relevant persons/teacher and that you will keep in contact with the child.

RECORD

If possible, ask the person if you can make brief notes or drawing about what they are actually telling you at the time. Keep these notes, however rough they are. If you are unable to make notes at the time, write down what was said as soon as you can.

Try to record what was actually said by the child rather than your interpretation of what they are telling you. Record the date, time and any noticeable nonverbal behaviour.

Make your report, using the incident report form (**Appendix Five**).

Who do you give the report to?

- Alert the Designated Safeguarding Lead of the concern witnessed.
- The staff member who witnessed the concern should write an incident report using the iOi template (see **Appendix Five**).
- This should then be given to the iOi Designated Safeguarding Lead and Chief Executive.
- The iOi Designated Safeguarding Lead should then discuss this with the Designated Person for Safeguarding at the relevant school or local authority, and ensure the report is stored in a secure location in the registered office.
- The iOi Designated Safeguarding Lead or Chief Executive should follow up with the school.

Whistleblowing

Whistleblowing is a process used to flag wrongdoing in the workplace. The wrongdoing you disclose must be in the public interest, which means that it must affect others e.g., the general public. If you have a concern about the workplace, we encourage you to discuss it with your line manager or the Chief Executive in the first instance.

For further information on whistleblowing, please refer to our whistleblowing policy, saved in Public/HR/General/Approved policies and included as an **Appendix** here on **page 28**.

The NSPCC whistleblowing helpline is available for staff that do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Crisis Communications

In the experience of an incident taking place at an iOi experience, staff should follow the crisis communications procedure and revert all communication to externals and the media through the Communications team.

Please see the crisis communications procedure for further information (**Appendix Five page 28**).

Appendix One: Types of Abuse and Possible Indicators

The table below outlines the four main categories of abuse as defined by the Department of Health 'Working Together to Safeguard Children' document 2010. The possible indicators are not definitive, and some children may present these behaviours for reasons other than abuse.

<p>Neglect The persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairments of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide food, clothing and shelter; protect a child from physical and emotional harm or danger. Ensure adequate supervision; ensure access to appropriate medical care or treatment.</p>	<p>Obvious signs of lack of care including: Problems with personal hygiene Constant hunger Inadequate clothing Emaciation Lateness or non-attendance at school Poor relationship with peers Untreated medical problems Compulsive stealing and scavenging Rocking, hair twisting, thumb sucking Running away Low self-esteem</p>
<p>Physical Abuse May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or care fabricates the symptoms of, or deliberately induces illness in a child</p>	<p>Physical signs that do not tally with the given account of occurrence Conflicting or unrealistic explanations of cause Repeated injuries Delay in reporting or seeking medical advice.</p>
<p>Sexual Abuse Forcing or enticing a child 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, penetrative or non-contact activities.</p>	<p>Sudden changes in behaviour Displays of affection which are sexual and age inappropriate Tendency to cling or need constant reassurance Tendency to cry easily Regression to younger behaviour – e.g., thumb sucking, acting like a baby Unexplained gifts or money Depression and withdrawal Wetting/soiling day or night Fear of undressing for PE</p>
<p>Emotional Abuse 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.</p>	<p>Rejection Isolation Child being blamed for actions of adults Child being used as carer for younger siblings Affection and basic emotional care giving/warmth, persistently absent or withheld</p>

Appendix Two: Sample scenarios

We have created a number of scenarios for the iOi staff for public and school's engagement programmes that we hold. These scenarios have been checked with our local safeguarding officer in order to follow the appropriate procedures.

Scenario A

A large experience is taking place. Various organisations and schools are involved in the experience. A school of 30 children is partly engaged in a workshop activity but it is clear that the teachers do not have complete control of the class in relation to behaviour management. There is an expectation of behaviour management falling on iOi staff team. One child working in the group makes what appears to be a racist comment to another child. It isn't said very loudly but is overheard by an iOi staff member and the staff member is certain they heard a racist comment made from one child to another.

What are the steps an iOi staff member and school should take?

Schools Experience

If iOi is responsible for the experience, ensure that the iOi Lead is aware and that the teacher responsible for the school is informed. Allow the teacher to speak to the child and manage the behaviour. iOi should report to the school. The iOi Lead would be responsible for filling in an incident report form and sending this to the school before the end of the day. As in line with iOi's behaviour management procedure schools should lead on behaviour management wherever possible.

Public Experience

If the situation were having a direct effect on public engagement iOi would be entitled to ask the child and parent/carer to leave. If you felt it was directly abusive, you should call local authority adviser and report it.

Scenario B

A child exposes a bruise. They do not show it to you, instead you happen to see it, and when you ask what happened they imply that it was their fault or that they did something wrong.

What are the steps an iOi staff member should take?

The person having this conversation must not make leading questions or make presumptions about the situation. However, if you think it is significant, draw a stick person showing where the bruise is, how fresh, and its width and colour.

You should write an incident report about on the facts of the conversation.

If it is with a school, collect details of the participant and report it to the school and if it is with the public, report it to your local authority officer.

Scenario C

Other children are bullying a child verbally and it turns physical.

What are the steps an iOi staff member and school should take?

Schools Experience

Stop the session and ask the responsible teacher to manage the behaviour. iOi should write and file an incident report with the school.

Public Experience

The iOi lead should ensure that the adults responsible for the children are made aware and allowed to manage the behaviour.

Scenario D

Child showing "inappropriate behaviour", e.g. exposing genitalia to other children, in the toilet or in public

What are the steps an iOi staff member should take?

Schools Experience

The iOi staff member must report it to the school. The teacher present should manage the situation during the workshop.

Public Experience

The iOi experience manager should manage the situation, report to social services and to the parents/carers if appropriate (it could be a result of abuse). iOi should ask Local Authority for advice following logging the report.

Scenario E

A child is being excluded at a school's workshop by other children, sitting alone, does not want to engage, is very withdrawn rather than angry or sulky. When asked to join says that his parents/carers do not like him playing or talking to other children

What are the steps an iOi staff member and school should take?

iOi staff should try to engage with the child and get the support of the teachers present to allow the child to be included. If you sense there is something that is wrong with the child and there is some evidence verbally or physically then the iOi Lead should write a report (using reporting steps above), discuss with teacher and discuss with the school.

Scenario F

You are at a public experience and there is a child of whom you are unsure of adult's connection to child or child does not seem to want to go home with the adult.

What are the steps an iOi staff member should take?

Check with NSPCC/local authority procedure. If the child is distressed or seems in danger, call the police. Write up a report using the steps above and log this with the Local Authority officer.

Scenario G

A child discloses, but then takes it back and says they didn't mean it.

What are the steps an iOi staff member should take?

Schools Experience

The iOi member of staff should report it to the teacher and write an incident report.

Public Experience

The manager of the experience reports it to the Local Safeguarding Authority officer regardless of any follow up from the child (i.e., saying that they didn't mean it) as it is something that the child has said, and it must be investigated.

Scenario H

A child is violent towards someone (either an adult or another child) at a public or schools experience.

What are the steps an iOi staff member should take?

Schools Experience

The lead teacher would manage the situation. A report would be written by the iOi staff member and sent to school. iOi would decide whether to report to our Local Authority officer too.

Public Experience

The iOi Experience Manager will be called to manage the situation. If there was a risk of safety towards other members of the public, the children and accompanying adults should be asked to leave. The member of staff will write a report and the iOi Designated Safeguarding Lead will log this with the Local Authority officer.

Scenario I

An uninvited or unfamiliar adult is trying to join an online experience and you do not recognise their name on the register.

What are the steps an iOi staff member should take?

Keep them in the Waiting Room and have the supporting member of staff maintain a conversation with them to identify who they are.

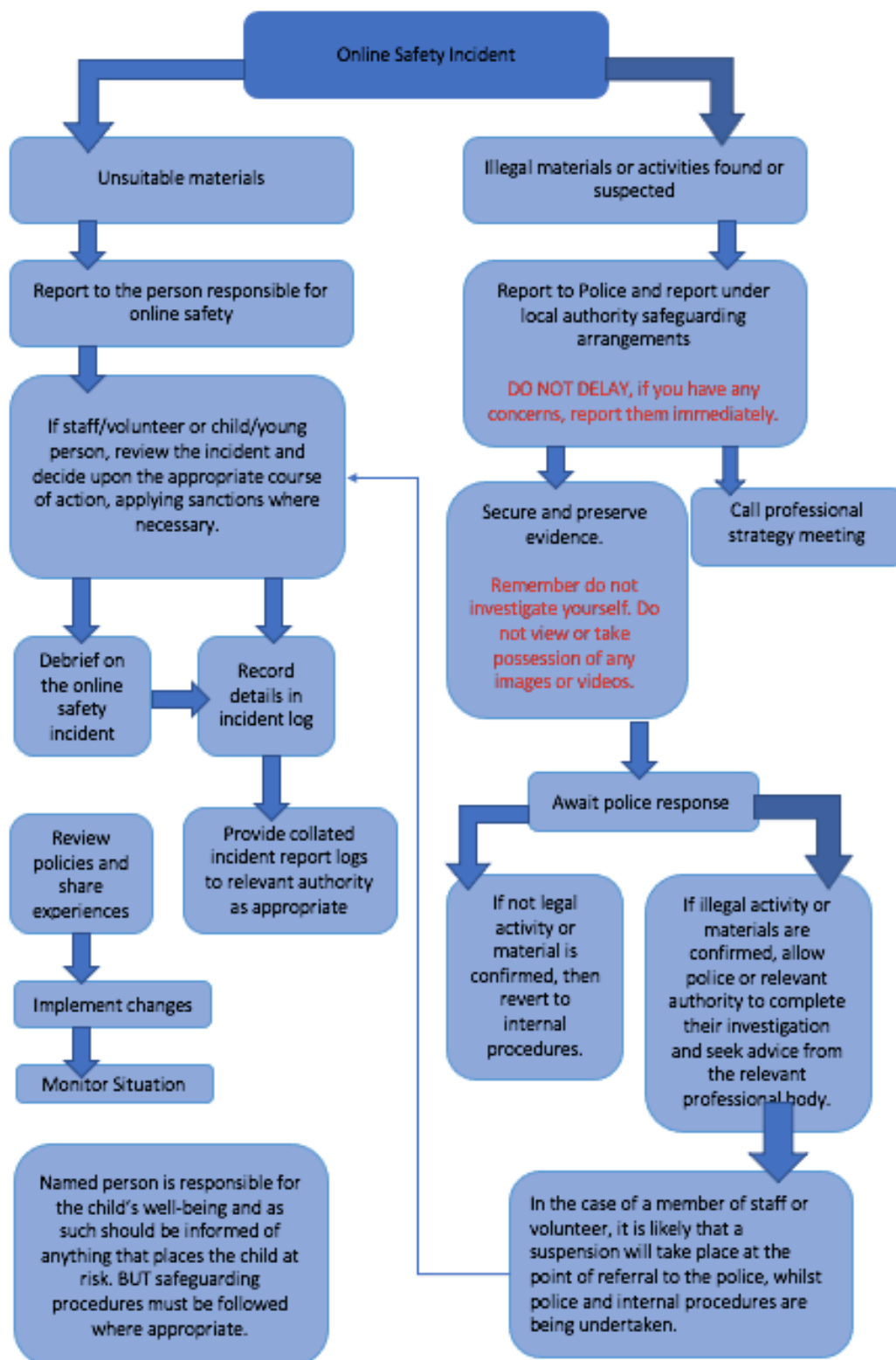
Appendix Three: Procedure of Communications

In any cases where an iOi staff member is concerned/unsure/worried about a child, vulnerable adult or the actions of an adult, they should follow the below procedure:

- Alert the Designated Safeguarding Lead of the concern witnessed.
- The staff member who witnessed the concern should write an incident report by hand using the iOi template (see **Appendix Five**).
- This should then be given to the iOi Designated Safeguarding Lead.
- The Designated Safeguarding Lead should discuss this with the Director of Experience and Learning and the Chief Executive and ensure that the original is kept in a secure location in the registered office. If the concern refers to either of these individuals, it should then be discussed with the nominated trustee.
- The report should be discussed with the relevant local authority and/or school.
- The Designated Safeguarding Lead should follow up with the school or local authority.

Appendix Four: Responding to Incidents of Misuse Online

This guidance is intended for use when iOi staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities.



Appendix Five: Incident Report Form

The format of this form should be used by members of staff or volunteers to record disclosures or suspicions of abuse. The completed form should be completed digitally and sent as a password protected document to the Designated Safeguarding Lead dealing with the allegations.

Your name	Your position
Place of work	Contact phone number
The child's details	
Name	
Address/phone number	
Date of birth/Age	
Other relevant details about the child/vulnerable adult: E.g., family circumstances, physical and mental health, any communication difficulties.	
Parent/guardian/carers details	
Details of the allegations/suspicions	
Are you recording: Disclosure made directly to you by the child. Disclosure or suspicions from a third party? Your suspicions or concerns? Computer or App that was in use? (If there are any images or URL please attach them as PDF to this report.) Inappropriate sharing of personal data	
Date and time of disclosure/incident	
iOi staff members present	
School representation present	
At what type of experience did this occur? (School workshop/public experience)	



Details of the allegation/suspicions. State exactly what you were told/observed and what was said. Use the persons own words as much as possible

Use this space to draw a stick man pointing out any affected areas on the child's body, if relevant

Action taken so far:

Signed:	Date
Counter signature (Designated Safeguarding Lead, if applicable):	Date
Chief Executive signature:	Date

Appendix Six: Crisis Communications

All organisations are exposed to physical, virtual and reputational risks that need to be skillfully managed, as efficiently and discreetly as possible.

Crises can take various forms. They can involve:

- Experience attendees (e.g., an accident workshop or event).
- Staff (employee misconduct, corporate negligence, unethical behaviour, malpractice, leaking of confidential documents, fraud, corruption).
- Processes (a computer or power failure, fire, explosion, malfunction of equipment, spillage or emissions affecting the safety of the community or environment, collapse of a building or other structure).
- Financial (loss of business, cancellation of contracts, donor issues).
- Regulatory / political (problems with proposed regulatory changes, official investigations, or outspoken remarks by an influential politician or businesses that might affect us).
- Third Parties (pressure groups; demonstrations).
- Natural (floods, gales, landslides).

Which procedures does iOi follow in a crisis?

All team members will report a crisis or incident immediately to the Chief Executive or the most senior person available, preferably a member of the Senior Leadership Team.

They will evaluate the situation to determine whether iOi is facing an incident or buildup of circumstances that have the capacity to undermine our ability to conduct business as usual or damage our reputation severely. If they are satisfied that the situation or incident satisfies such criteria, they should immediately contact the iOi CEO (who in turn should alert the Board if it's significant enough) and convene call or meeting to establish the facts of the incident and our response.

Media management in a crisis

The Communications team will be responsible for all communication with the media. All communication is governed by the following rules:

- All information provided to the media must be factual and verified.
- Avoid speculation.
- A media holding statement will be drafted immediately to hold off further queries until more is known. All statements and press releases must be cleared by a legal adviser prior to issue (and an insurer), if necessary; and, once sufficient facts are ascertained, the holding statement will be updated to deal with immediate press enquiries and to give staff dealing with the media a basic script from which to work.
- A Q and A to identify all potential media and stakeholder questions will be started.

Dealing with negative coverage

At some point we may receive negative or incorrect coverage. If the journalist simply does not like us/iOi or what iOi is doing, there is little we can do as this is his/her opinion (and the reason media coverage is so important is because readers trust it to be impartial). We can address this by trying to build a relationship with the journalist, giving them useful information and remaining available for comment - don't try to 'punish' them by refusing to deal with them. If they have misunderstood or misinterpreted the facts, clarify this for them and offer them a spokesperson for interview. Sometimes we just can't win them over, so remain professional and continue to send them releases/speak to them.

If, however, a journalist has published incorrect or deliberately defamatory information, contact them immediately and ask them to correct the information online/in the next publication. We have no right to insist on this, but a professional journalist likes to get the facts right. If they refuse, and it is a serious matter, we could contact the editor. We can also send them a letter marked for 'publication' where we correct the information (though, again, they do not have to publish this).

Unless an article is genuinely defamatory or damaging, it is not worth making a legal threat - this will damage our relationship with that publication forever. If a comment is very seriously negative however, further steps might be made.

If the problem is a comment in the article made by a third party, then it is not the journalist's problem - unless he/she deliberately used a negative comment but did not ask the IOI in advance for a response or did not include our response. Never get into a slanging match in the media with anyone making a negative comment about us - or the fight will become the story, instead of our positive messages. (In the same way, never make a negative comment about anyone to a journalist - a partner past employee, supplier or anyone. Even if the remark is 'off the record' it could easily be published or broadcast).

The best defense against negative coverage is to ensure we have good media relationships and have lots of positive news to issue.

Appendix Seven: Signs of Radicalisation

A child who is being radicalised may show the following signs:

- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- Unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

If you are concerned that a child is being radicalised, you should document these concerns and the actions that led to them and share this with the relevant bodies, following the safeguarding reporting procedure.

Appendix Eight: Signs of Female Genital Mutilation

The age at which girls are subjected to female genital mutilation varies greatly, from shortly after birth to anytime up to adulthood. The average age is 10 to 12 years.

Indications that FGM may be about to take place:

- The family comes from a community that is known to practice FGM.
- A child may talk about a long holiday to her country of origin or another country where the practice is prevalent, including African countries and the Middle East.
- A child may visit a travel clinic, or equivalent, for vaccinations or anti-malarial medication in preparation for a trip abroad.
- A child may confide to a professional that she is to have a 'special procedure' or to attend a special occasion.
- A child may request help from a teacher or another adult.

Any female child born to a woman who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family. Any female child who has a sister who has already undergone FGM must be considered to be at risk, as must other female children in the extended family.

Indications that FGM may have already taken place include:

A child may spend long periods of time away from the classroom during the day with bladder or menstrual problems if she has undergone Type 3 FGM.

A prolonged absence from school with noticeable behaviour changes on the girl's return could be an indication that a girl has recently undergone FGM.

A child may present abrupt or uncharacteristic behavioural changes indicating emotional distress or psychological difficulties (e.g., withdrawal, depression etc.)

If you are concerned that a child is due to undergo FGM, you should complete an incident report form detailing information that led to your concerns and contact the relevant bodies with this form.

I, Laura Watson (Lead Safeguarding Trustee) confirm that the Institute of Imagination's Safeguarding Policy has been approved by the IOI's Board of Trustees on 19/09/23.

Date: 19/09/23

Signature: 

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www.ioi.london

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