
LimeCulture CIC Safeguarding Policy

LimeCulture CIC is fully committed to safeguarding and we believe that everyone has the right to be safe. We believe safeguarding is of paramount importance and work tirelessly to ensure LimeCulture CIC is at the forefront of safeguarding practice to protect those within our care as well as influence organisations and professionals to promote the safety and well-being of all children, young people and adults at risk. This policy sets out our expectations of safeguarding at LimeCulture CIC and applies to everyone involved with LimeCulture CIC. We all share a responsibility for promoting and protecting the safety and welfare of all children, young people and adults at risk and encourage any person who has a safeguarding concern to contact our Designated Person as outlined in this policy.

A handwritten signature in black ink that reads "S Reardon".

Stephanie Reardon
Joint CEO
September 2020

A handwritten signature in black ink that reads "K Doyle".

Kim Doyle
Joint CEO
September 2020

Definitions:

Adult at risk means any person aged eighteen or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Child, children and young people means any person or persons who have not yet reached their eighteenth birthday.

Safeguarding

Safeguarding children and young people is the action taken to promote the welfare of children and young people and protect them from harm. This means protecting children and young people from abuse and maltreatment, preventing harm to their health or development, ensuring they grow up with the provision of safe and effective care, and taking action to enable all children and young people to have the best outcomes.

Safeguarding adults at risk means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and to stop both the risks and experience of abuse and neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Staff means any person employed or deployed by LimeCulture CIC whether in a paid, voluntary, consultancy or third-party capacity.

Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/ or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations

on children, young people and adults at risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which involves forcing or enticing a child, young person or adult at risk to take part in sexual activities. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children, young people and adults at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging children, young people or adults at risk to behave in sexually inappropriate ways, or grooming a child, young person or adult at risk in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation: A form of child/young person sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child/young person into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using children, young people and adults at risk. Gangs recruit children, young people and adults at risk through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an adult at risk who is unable to challenge them. County line gangs pose a significant threat to children, young people and adults at risk upon whom they rely to conduct and/or facilitate such criminality.

Neglect: Ongoing failure to meet the basic needs of children, young people and adults at risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

Grooming: The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children, young people and adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

Female genital mutilation (FGM): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act 2003 makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children/young people. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Discriminatory abuse: Abuse or bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of children, young people and adults at risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing children, young people and adults at risk in potentially compromising and uncomfortable situations, failing to ensure the safety of children, young people and adults at risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals. Staff going into organisations should challenge poor practice and inform LimeCulture's Designated Person.

Hazing: Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of children, young people and adults at risk.

Peer-on-peer abuse: children, young people and adults at risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

Infatuations: children, young people and adults at risk may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. They should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child, young person or adult at risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Designated Person (or the CEO's in his/her absence).

Domestic violence: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to: psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

Abuse specific to Adults at Risk

The Care Act 2014 defines additional types of abuse related specifically to safeguarding adults at risk which are described below.

Financial or material abuse: Stealing from a vulnerable person, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets.

Modern slavery: Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Organisational: Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within an adult at risk's own home. This may range

from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.

Neglect/acts of omission: Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services or the withholding of the necessities of life such as medication, adequate nutrition and heating.

Self-neglect: Neglecting to care for one's personal hygiene, health or surroundings, including behaviour such as hoarding.

Table of Contents

Aims of the policy.....	7
Principles	7
Evaluation and review.....	7
Designated Person	8
Safer recruitment and raising awareness	8
Relationships of trust.....	9
Partnerships and commissioned services	9
Behaviour.....	9
Dealing with a disclosure.....	11
Recording and reporting disclosures and other safeguarding concerns.....	13
Support for Staff	14
Referrals.....	14
Disclosure and Barring Service (DBS).....	15
Data protection	16
Listening culture.....	16

Communication	16
Photography and video footage	17
Interviewing children and young people for the purposes of commissioned services	17

Aims of the policy

The aims of this policy are to:

- Outline our commitment and expectations
- Promote the highest safeguarding standards
- Ensure there are effective measure in place to assess the suitability of staff and partners
- Ensure that staff are clear about what constitutes appropriate behaviour and professional boundaries

Principles

- Safeguarding is everyone's responsibility
- Everyone has the right to be protected from abuse, mistreatment and exploitation;
- We strive to create a culture and environment where everyone is empowered to protect themselves and others
- We actively promote working together to ensure all children, young people and adults at risk are safeguarded
- We have robust and transparent governance arrangements for safeguarding

Evaluation and review

We will regularly assess the implementation and effectiveness of this policy annually, or whenever there are changes in legislation, government or statutory guidance, personal changes within the organisation or after managing a safeguarding concern.

Designated Person

Our designated person holds operational responsibility for safeguarding. Our designated person is:

Annabel Timmins

Tel: +44 (0) 7762 591 664

Email: Annabel.Timmins@limeculture.co.uk

If the designated person is not available, the deputy designated person is:

Maria Putz

Tel: +44 (0) 7753 694 743

Email: maria.putz@limeculture.co.uk

Designated persons will be suitably qualified and experienced in safeguarding, or will be provided with additional training and support to fulfil their responsibilities.

Safer recruitment and raising awareness

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in respect of abilities and qualifications. LimeCulture is committed to applying its equal opportunities policy at all stages of recruitment and selection.

We are committed to safer recruitment procedures, detailed in the Employment Handbook, which include:

- Ensuring recruiters and interviewers are appropriately trained and supported.
- Fair and thorough application processes.
- Pre-recruitment checks which include identity verification, references and where applicable, criminal record checks.
- Role descriptions which accurately record responsibilities.
- Providing effective supervision, training and support.

All new members of Staff will receive an induction which will include familiarisation with this Policy and individual safeguarding responsibilities.

Relationships of trust

Those who have responsibility for and authority or influence over children, young people and/or adults at risk are in relationships of trust in relation to those children, young people and/or adults at risk in their care (for example our learners on our courses). A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity. It is vital for all those in such positions of responsibility to understand the power they may have over those in their care and the responsibility they must exercise as a consequence. All our staff who are perceived to be in a relationship of trust are informed of their inherent power and are bound by our behaviour guidelines set out in this Policy.

Partners and Consultants

We will actively promote safeguarding within all staff, Partners and Consultants by:

- Ensuring that safeguarding is a primary consideration.
- Actively communicating our safeguarding policies and procedures to staff, partners and Consultants. This will include email updates and agenda items in team meetings.
- Assessing the suitability of partners and Consultants and the adequacy of their safeguarding and practice.
- Ensuring that contractual agreements outline respective safeguarding responsibilities.

Where LimeCulture is not providing direct services to children, young people and adults at risk, we will always work in conjunction with the organisation who has commissioned our services. Therefore, to ensure we promote the safety and wellbeing of all children, young people and adults at risk we require a member of the organisation is present when LimeCulture is carrying out its activities. When there are incidents, disclosures or concerns of abuse or neglect, LimeCulture will encourage the organisation we are working with to follow their safeguarding policy, should LimeCulture not believe the adequate steps have been taken by the organisation we may choose to follow the referral process in this policy to safeguard the child, young person or adult at risk.

Where LimeCulture is providing a service direct to children, young people and adults at risk, and safeguarding concerns arise, the LimeCulture safeguarding procedures will be followed.

Behaviour

Staff are expected to ensure that the safety and welfare of children, young people and adults at risk is the primary consideration where no policy, rules or guidelines exist.

Staff have a responsibility to maintain confidence in their suitability to work with children, young people and adults at risk. Behaviour and actions that would lead any reasonable person to question motivation, intentions and suitability to work with children, young people and adults at risk must be avoided.

Staff are expected to:

- Familiarise themselves with this Policy.
- Know who the Designated Persons are and how to contact them.
- Ensure the safety of children, young people and adults at risk at all times.
- Always act in the best interests of children, young people and adults at risk.
- Build balanced relationships with children, young people and adults at risk based on mutual trust.
- Maintain appropriate and professional boundaries at all times.
- Treat all children, young people and adults at risk equally, with respect, dignity and fairness.
- Ensure that the same professional standards are applied regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability.
- Respect the views, wishes and feelings of children, young people and adults at risk.
- Recognise the developmental needs of children/young people and capacity of children, young people and adults at risk.
- Help maintain an ethos whereby staff, partners, children, young people and adults at risk and their parents/carers feel able to express any concerns comfortably and safe in the knowledge that effective action will be taken as appropriate.
- Promote an environment where poor practice is challenged and reported.
- Ensure that any concerns or allegations pertaining to the safety and/or welfare of children, young people and adults at risk are recorded and acted upon in accordance with this Policy.
- Encourage and demonstrate consistently high standards of behaviour and understand the types of behaviour that may call into question their suitability to work with children, young people and adults at risk.
- Be aware that behaviour outside of work time may impact upon their suitability to work with children, young people and adults at risk.
- Be aware that breaches of the law and this Policy may result in criminal and/or disciplinary action being taken against them.

Staff should never:

- Use their position of power and influence to intimidate, threaten, coerce, exploit or undermine children, young people and adults at risk.

- Use their status and standing to form or promote inappropriate relationships. Professional boundaries must be maintained at all times.
- Use their position to gain access to information relating to children, young people and adults at risk for their own or others' advantage. Such information should only be used or shared to protect children, young people and adults at risk and to meet their needs.
- Carry out their duties whilst under the influence of alcohol, solvents or drugs.
- Engage in any discussions relating to sexual behaviour, betting, gambling or related activities in the presence of children, young people and adults at risk, except in a clear educational context and with the knowledge and agreement of LimeCulture CIC Senior Management.
- Never use LimeCulture CIC equipment to access pornography or access pornography on personal devices when on duty.
- Access, make or distribute illegal or indecent content or images of children, young people and adults at risk.

Dealing with a disclosure

When working alongside a commissioning organisation when working with children, young people and adults at risk disclosures should be managed in line with that organisation's Safeguarding Policy. However, should a member of staff receive a disclosure and either

- there is no member of the commissioning organisation present or
- the staff member is of the view that the response of the commissioning organisation is inadequate
- or LimeCulture are providing a direct service to children, young people or adults at risk, the following guidelines should be followed.

If a child, young person and/or adult at risk discloses that he or she has been abused or is at risk of abuse, staff must ensure that the child, young person or adult at risk's immediate needs are met and prioritise their safety and protection from further abuse above all else. It is important to remember that, while it is a member of staff's responsibility to be a supportive listener and to refer the information to the Designated Person/s or the CEOs in the absence of the Safeguarding Person/s, it is not their role to counsel the children, young people and adults at risk or to investigate their claims. Staff are, however, expected to act in the best interests of children, young people and adults at risk at all times.

Children, young people and adults at risk must be listened to and taken seriously. Once it has been established that a child, young person or adult at risk has been harmed, or is at risk of being harmed, staff should not pursue the conversation any further.

This means that Staff should:

- Ensure that the child, young person or adult at risk's immediate needs are met and that the priority is their safety and protection from further risk of harm.
- Allow the person disclosing to lead the discussion, to talk freely and at their own pace.
- Listen and remember that their role is supportive rather than investigative.
- Limit any questioning to the minimum necessary to seek clarification only.
- Put their own feelings aside and avoid expressing their views on the matter.
- Provide reassurance that the person disclosing is being taken seriously and that they are doing the right thing by disclosing.
- Be mindful that if physical abuse has taken place, they may observe visible bruises and marks, however they should not ask them to remove or adjust their clothing to observe them.
- Engage the person disclosing as far as possible about how best to respond to their safeguarding situation.
- Explain to the person disclosing what action they will be taking and that they will support them through the process.
- Always act in the best interests of children, young person and adults at risk and seek advice from the Designated Person/s (or the CEO's in his/her absence) if in any doubt about sharing information.

Where it is suspected that a crime has been committed, physical, forensic and other evidence must be preserved and consideration should be given to contacting the police as well as Children or Adult Services.

This means that Staff should not:

- Make promises or promise confidentiality.
- Seek details beyond those the person disclosing willingly discloses.
- Document the conversation while the person is disclosing. This should be done as soon as possible after the disclosure has been made.
- Ask leading questions.
- Name behaviour and/or body parts in language different to that used by the person disclosing.

- Give the impression that the person disclosing is to blame.
- Approach the alleged abuser or person whose conduct there are concerns about.

A disclosure is not the only way that Staff may be made aware of a safeguarding concern. Staff should immediately contact the Designated Person (or the CEO's in his/her absence) if they witness an incident or come upon information that causes concern or puts children, young people and adults at risk at risk of harm.

Recording and reporting disclosures and other safeguarding concerns

All safeguarding concerns and disclosures must always be taken seriously and every effort should be made to ensure that confidentiality is maintained for all concerned when dealing with a disclosure or a safeguarding concern. It is important to ensure that information is handled and disseminated on a 'need to know basis' only. Those who need to know are those who have a role to play in protecting the children, young people and adults at risk and others who may be at risk, for example:

- Designated Persons (those with specific operational responsibility for safeguarding).
- Statutory authorities (Police and Local Authorities).
- The DBS who help employers make safer recruitment decisions and prevent unsuitable people from working with children, young people and adults at risk.
- Regulatory Bodies (such as sport's or education's governing bodies)

If necessary any member of Staff may make a referral themselves directly to statutory authorities, particularly if they are concerned about a child, young person or adult at risk's immediate safety, if they are having difficulty contacting the Designated Person (or the CEO's in his/her absence) if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately. The Designated Person (or the CEO's in his/her absence) must be notified immediately after contacting a statutory authority or emergency services.

It is vital that clear and concise notes are made at the time of the concern or soon after a disclosure is made to support the completion of a more detailed record later. A written record should include the following information wherever possible:

- The date and time of incident or disclosure, parties involved i.e. victim(s), the person(s) whose conduct there are concerns about, any witnesses, person(s) reporting the concern, person(s) to whom the concern was reported.
- Factual information. Staff might convey their intuitive thoughts but these should be recognised as such and should not form part of the record.

- In the case of bruises or observed injuries, a body map (a drawing of a body outline, upon which the location of bruises/injuries can be indicated) can be completed.
- The date and time of referring the information and to whom the information was referred.

Such records must be signed and dated by the individual recording the information. If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

Staff should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

Support for Staff

Dealing with a disclosure or a safeguarding concern may have an impact on the wellbeing of the Staff involved. It is important that anyone affected seeks help if they feel that they need support.

In the first instance, Staff can seek support from their line manager, and the CEO's if their line manager is not available.

Referrals

Where LimeCulture is commissioned and working alongside other organisations to work with children, young people and adults at risk, if there is a safeguarding concern about a child, young person or adult at risk, Staff should speak with the Designated Person at the commissioning organisation and encourage a referral as per the organisations' Safeguarding Policy. Staff should also contact LimeCulture's Designated Person/s informing them of their concerns. LimeCulture may escalate concerns to Children's or Adult's Services if they deem that the organisations' response or referral was not adequate.

Where LimeCulture is working directly with children, young people and adults at risk, the following process should be followed.

In the event that a Staff member has concern that an adult working with children or adults at risk has acted in the following ways, a referral should be made to the Local Authority Designated Officer (LADO) for children/young people or to Adult Social Care for adults at risk:

- Behaved in a way that has harmed, or may have harmed a child, young person or adult at risk;
- Possibly committed a criminal offence against or related to a child, young person or adult at risk;
- Behaved towards a child, young person or adult at risk in a way that indicates they may pose a risk of harm.

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk.

The LADO is responsible for management and oversight of all Child Protection allegations made against Staff and volunteers who work with children/young people. The LADO may also be known as the Designated Person within the Local Authority.

Where there are concerns for the safety or well being of a child or young person, contact should be made with the Designated Person/s (or the Deputy, in their absence) and a referral should be made to the relevant Local Authority Children's Services. Where possible parents/carers should be informed, unless to do so would place the child at risk.

Where there are concerns for the safety or well being of an adult at risk, contact should be made with the Designated Person/s (or the Deputy, in their absence) and a referral should be made to the relevant Local Authority Adult's Services.

Referrals could be by telephone but must always be followed up in writing.

If there is immediate concern for welfare, the police should be contacted. Any member of staff can contact the police if there is an immediate threat of harm.

Details of this procedure can be found in the Escalation and Safeguarding Procedure.

Disclosure and Barring Service (DBS)

The duty to refer to the DBS is met when an employer has dismissed or removed a person from regulated activity (defined in the Safeguarding Children and Adults at Risk Act as amended by the Protection of Freedoms Act) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has:

- Been cautioned or convicted for a 'relevant offence'. A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the children's or adults' barred list.
- Engaged in 'relevant conduct'. 'Relevant conduct' is that which endangers or is likely to endanger children, young people and adults at risk.
- Satisfied the 'harm test':
 - The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm or may incite another person to harm a children, young people and adults at risk.

Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

Data protection

We will maintain confidentiality of all; (i) data collected (in writing or electronically) relating to children, young people and adults at risk, (ii) information and documentation relating to safeguarding allegations, concerns and incidents, and (iii) information and documentation relating to recruitment and selection procedures in accordance with relevant data protection legislation and our Knowledge Management Policy.

Listening culture

We believe that children, young people and adults at risk have the right to be heard and involved in decisions that affect them. LimeCulture CIC will always act in the best interests of children, young people and adults at risk and we will seek their views (and in the case of a child/young person, the views of their parents/guardians where appropriate) as far as is feasible taking their age, understanding and capacity into account when responding to disclosures and safeguarding concerns.

In the absence of consent from an individual making a disclosure or to whom the information relates, we will take proportionate action that does not increase the risk of harm. This may include sharing information where there is an overriding duty to do so for legitimate purposes. This may include taking action and/or sharing information where there is an overriding duty to do so for legitimate purposes.

We are committed to ensuring that safeguarding is person-led and outcome-focused. We will engage children, young people and adults at risk about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving wellbeing and safety.

Communication

Communication with children, young people and adults at risk, by whatever method, should take place within professional boundaries. This includes the wider use of technology, for example, mobile phones, emails and social media.

This means that Staff should:

- Never share any personal information and should not request any personal information from children, young people and adults at risk. LimeCulture CIC must be aware of all personal data processed by Staff.
- Be circumspect in their communications with and about children, young people and adults at risk to avoid any possible misinterpretation of their motives or behaviour.
- Only contact children, young people and adults at risk for professional reasons and with the agreement and knowledge of LimeCulture CIC.

Photography and video footage

Photography and video footage include the taking of still photographs, filmed and moving images and video recordings by whatever means. Staff should never take, display or distribute images of children, young people and adults at risk without their knowledge or consent (and parental/guardian consent in the case of a Child) and without the agreement and knowledge of LimeCulture CIC. Carer consent is not required prior to taking images and/or video footage of adults at risk, however, care must be taken to ensure that the adult at risk understands the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media or on the internet.

Interviewing children and young people for the purposes of commissioned services

Staff should never interview children and young people in relation to a safeguarding incident. However, they may interview children and young people during the course of delivering a piece of commissioned work. Staff should follow the guidelines set out below and seek guidance from the Designated Person when undertaking such services.

Consent: Consent to interview a child or young person needs to be obtained from the person with parental responsibility and/or the child or young person if they are of sufficient age and understanding to make this decision.

Adults accompanying the child or young person: A child or young person may choose to be accompanied (in addition to the interviewer) during interviews. Anyone accompanying a child should be briefed about their role in supporting the child.

Interviewers: LimeCulture CIC will ensure that only those with sufficient experience and expertise are appointed to interview children and young people.

Interviewers must ensure that:

- They adhere to LimeCulture CIC's policies, procedures and guidance.
- Interviews take place in safe and appropriate environments.
- They request permission to record interviews if this is required.
- They maintain professional boundaries at all times.
- Contact by whatever means and meetings with children/young people should never take place without the agreement and knowledge of LimeCulture and the Child/young person's parents/carers.
- They record and report any situation which may place a child/young person at risk.
- Information suggesting that children and young people at risk of harm is immediately reported to the Designated Person (or the CEO's in their absence).