

Child protection and safeguarding policy at Electric Medway

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Designated Safeguarding Lead (DSL)

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(contact details removed from public version)

Policy statement

Electric Medway believes that the welfare of children, young people and adults at risk of abuse is paramount. All children, young people and adults at risk of abuse have the right to protection from harm, whatever their age, disability, gender reassignment, race, religion or belief, sexual orientation or economic status. Everyone should be treated with respect and dignity, and everyone has a responsibility for safeguarding.

Definitions

Child or young person a person under the age of 18.

Vulnerable adult a person over the age of 18 who may be in need of extra support. This is because they are elderly or have a learning disability, physical disability, sensory impairment or mental health problems. They also may be unable to take care of themselves or protect themselves from harm.

Abuse can be physical, sexual, psychological or emotional harm, neglect, maltreatment, radicalisation or

exploitation. Abuse may consist of a single or repeated act, affecting one or more people. It can take place in person or online, and can be carried out by any person or organisation.

Adult at risk of abuse is defined by the Care Act (2014) as someone who is over the age of 18 and is experiencing or at risk of abuse and has needs for care and support which means that they are unable to protect themselves against the abuse or neglect, or the risk of it.

Child or young person at risk of abuse a person under the age of 18 that is experiencing or is at risk of abuse.

What we do

Electric Medway's mission is to enable communities across Medway to get creative with new technology, supporting our main beneficiaries - local young people, families and artists. The activities we provide are often the first opportunity for someone to access digital creativity and we believe there is a digital storyteller in everyone.

What this document contains

This document outlines our **Child protection and safeguarding policy** and the procedures for all work with children and young people under 18 yrs, and vulnerable adults. It also provides specific guidance for **Digital safeguarding**, which is relevant to our work. There are additional links to **other Electric Medway policies**, where needed.

The purpose of this policy

- to protect children and young people under 18 yrs, and vulnerable adults aged 18+ who take part in Electric Medway events and workshops. This includes those who take part in our activities online and offline.
- to provide the Electric Medway team with the tools and procedures to confidently deliver our approach to child protection and safeguarding. This includes our Company Directors, Advisory Board members, employed staff, freelancers, volunteers, interns and anyone else working on behalf of Electric Medway.

The scope of this policy

The policy is active across all our work, including but not limited to when we work with:

- audiences and participants at our programmed events e.g. our outdoor Festival, or an activity online.
- performers, artists, technicians and managers.
- schools, community venues or other established groups or organisations, alongside their own related policies.
- volunteer, work experience, internship and apprenticeship placements.
- visitors to our office space.
- vehicle drivers and public transport.

Recruitment processes for all staff

for Directors, Advisory Board members, paid staff and freelancers

1. Applicant completes a form or submits a CV.
2. We interview each person to assess their suitability.
3. We request a minimum of two references.
4. We undertake a risk assessment for the assigned role.
5. We ensure adequate employers liability and public liability is in place.
6. We undertake a DBS check (Disclosure and Barring Service).

for Volunteers, interns and work experience placements

1. Applicant completes a form from referral partner e.g. a school, college, university or Medway ChangeMakers volunteer scheme.
2. Referral partner assesses their suitability.
3. We provide referral partners with role description, risk assessment, child protection and safeguarding policy and evidence of employer's liability insurance certificate.
4. We ensure the person(s) are supervised by at least two DBS checked members of the team.

Staff code of conduct and behaviour

Electric Medway should:

- provide all staff with training on our child protection and safeguarding procedures in accordance with this policy. This will include:
 - o induction training within the first month of starting employment and always before working directly with participants. This will cover an overview of the organisation, its mission, values, programmes and structure. It will also provide staff with an understanding of our

- responsibility to provide a safe service, and guidance on how to recognise signs of abuse and report incidents.
 - o introducing the Designated Safeguarding Lead (DSL)
 - o refresher training in safeguarding annually by a qualified member of staff or external trainer.
 - o ensuring volunteers and Advisory Board members are included in training.
- ask external contractors to read this policy and sign an agreement to adhere to our safeguarding and child protection code of conduct and procedures.
- risk assess the activity(s) we are asking staff to undertake that involve children, young people and vulnerable adults, and share mitigations with them. This includes having adequate insurance.
- make our policy publicly available to both staff on our shared Drive and on our website.
- have one Advisory Board member responsible for the oversight of our Child protection and safeguarding policy.

Staff should:

- treat everyone equally, with respect and dignity.
- create a safe environment and put the welfare of participants first, including not taking part in harmful activities, taking breaks, having clear fire evacuation plans and access to water and toilet facilities.
- get written consent from parents and carers for children and young people under the age of 18 to take part in our activities. See the **Procedures** section below.
- obtain relevant emergency contact details, medical conditions information and data permissions, including photography.
- keep up to date attendance records.
- consider the mental health of participants and promote positive experiences.
- not misuse their power.
- ensure any physical contact is minimal, time limited and age appropriate e.g. administering first aid.
- not offer transport to children.
- not engage in communication with children e.g. via personal email, phone, video call, social media or chat room. Any such communication should be directed through official accounts and with a parent or carer.
- adopt safe practices when using digital spaces and digital data with participants e.g. virtual reality, video calls, artificial intelligence and 3D models. See the full **Digital safeguarding guidance** below.
- avoid being left alone with a single child, young person or vulnerable adult other than in the case of an emergency.

Procedures

Who is responsible?

It is the duty of all staff, including Advisory Board members and volunteers, to ensure that participants are protected from harm. The policy should help all staff recognise and respond to cases of abuse.

It is the Designated Safeguarding Lead (DSL) that has responsibility for recording all instances of alleged or reported abuse. Staff should approach the DSL with any concerns of abuse.

Confidentiality

Confidentiality must be upheld in line with the Data Protection Act 2018, GDPR and the Human Rights Act 1998.

By law, Electric Medway cannot share any of the information we're told without permission from the person telling us, unless it "is a necessary and proportionate measure ... to safeguard the protection of the individual". See [Data protection: The Data Protection Act - GOV.UK](#) for more information.

The procedure to get written consent

1. A parent or carer must give permission for a child or young person to:
 - a. take part in an Electric Medway activity at a designated venue(s) or online
 - b. to be recorded using video, sound, photography and 3D scans for the purpose of marketing and evaluation. This could include use of their name, likeness, image, voice and participation.
2. Both types of consent are obtained through an activity-specific Registration Form or ticket system. This will also ask for relevant emergency contact details and medical conditions.

The procedure to deal with accidents and injuries

1. If a child, young person or vulnerable adult is injured while at an Electric Medway activity, or arrives with an injury a trained first aider should assess the situation, alert the key staff member and administer first aid if required.
2. If the incident is serious and medical attention is required, call an ambulance by dialling 999.
3. Log the incident by completing the form in the Accident Report Book, located with the onsite First Aid box.
4. Inform the emergency contact for the injured person.
5. Inform the Designated Safeguarding Lead (DSL).

The procedure if an allegation or complaint is made against a member of staff or a participant

1. If a complaint or allegation is made against a member of staff, he or she should be made aware of his or her rights under both employment law and internal disciplinary procedures, which may include temporary suspension pending an internal investigation.
2. This is the responsibility of the Designated Safeguarding Lead (DSL) supported by the Advisory Board member who oversees Child Protection and Safeguarding.
3. If the complaint or allegation is made against the Designated Safeguarding Lead (DSL), then responsibility passes to the Advisory Board member who oversees Child Protection and Safeguarding. If the complaint of allegation is made against the Advisory Board member, then responsibility passes to another Advisory Board member. Stage 1 of this procedure applies to all.

The procedure to report alleged or suspected abuse

- 1) If a staff member is concerned or suspicious about the welfare of a child, young person or vulnerable adult, or an allegation of abuse is made, they must report the concern or allegation immediately by completing the **Safeguarding incident or concern report form**. See how to report alleged abuse below.
- 2) The staff member (reportee) must complete the form in English, and provide a detailed and accurate account of the incident or concern. If the form is completed by hand, the reportee should avoid using abbreviations, and ensure it is written in sentence case, and is legible to read.
- 3) The reportee should remember to use empathy and interpersonal skills when communicating with a child, young person or vulnerable adult who discloses abuse. This includes using open body language, compassion, respect pauses in conversation and to reflect back to check your understanding.
- 4) All sections of the form should be filled in, which include details of:
 - a. the reportee
 - b. the child, young person or vulnerable adult at risk and their parents/carers
 - c. the alleged incident or concern
 - d. the outcome - and whether first aid was given or emergency services were called
 - e. any immediate next steps.
- 5) If the incident is serious and medical attention is required, call an ambulance by dialling 999.
- 6) if the person is under immediate danger, call the police by dialling 999.

- 7) Once complete, the reportee should sign and date the form, and pass on to the Designated Safeguarding Lead (DSL) as soon as possible afterwards.
- 8) Any staff concerns must be kept confidential, and should not be discussed with anyone other than the Designated Safeguarding Lead (DSL).
- 9) The Designated Safeguarding Lead (DSL) must complete the final section of the report, and decide what action should be taken, which could include reporting to Medway Council. See how to report alleged abuse below.

How to report alleged abuse

For Electric Medway staff

Safeguarding incident or concern report form (link removed from public version)

For the Designated Safeguarding Lead (DSL)

Medway Council

[Report a child safety concern](#)

[Report an adult safety concern](#)

[Report a radicalisation or extremism concern with Prevent](#)

Further guidance

Six Values

In England and Scotland, the [Care Act 2014](#) wants us to think about six values when safeguarding. These are:

- empowerment
- prevention
- proportionality
- protection
- partnership
- accountability

Making decisions for vulnerable adults

The [Mental Capacity Act 2005](#) (MCA) helps consider if a person's able to make a decision that's in their best interests. The most important thing is to make sure the person has a clear understanding of what might happen because of their

decision (the consequences). Whether or not someone can do this might be affected by things like:

- an age-related health condition
- a neurodiverse condition such as dyslexia, dyspraxia, ADHD, or is autistic
- a neurological condition, such as Parkinson's disease, dementia, motor neurone disease, multiple sclerosis (MS), a learning disability or cerebral palsy
- an acquired brain injury
- a speech impairment
- a mobility difficulty
- being Deaf or having hearing loss
- being blind or partially sighted
- mental health needs
- a long-standing condition such as cancer, HIV, diabetes, chronic heart disease or epilepsy
- being unable to make their own decisions and needs care and support
- being a young adult, over the age of 18, who has care and support needs and is transitioning from children to adult services
- being a carer (looking after another person with care and support needs)

Digital safeguarding

The majority of Electric Medway's work is carried out using creative technology with participants. This includes activities that use the Internet, virtual reality headsets, collaborative tools, chat spaces, AI and more.

The guidance below is designed to support Electric Medway staff in our duty to ensure everyone is safe during our digital activities.

The key risks are around:

- Digital spaces: bullying, accessing inappropriate content, exploitation and radicalisation.
- Digital data: manipulation, misrepresentation, fraud and creation of inappropriate content.

This guidance has been created alongside the [Online Safety Act \(2023\)](#) and [UK General Data Protection Regulation \(GDPR\) and the Data Protection Act \(2018\)](#).

If staff have a digital safety concern they should adhere to the same process of reporting alleged abuse, and alerting the Designated Safeguarding Lead (DSL), as set out in this policy document.

This section was last updated on 21 February 2025 by Janet Moore, Creative Director in consultation with the Electric Medway team, Advisory Board and the national ENGAGE Network, made up of digital arts organisations. It will be reviewed every year with the option to update earlier if emerging technology or legislation requires us to.

1. Concerns working in digital spaces

This includes but is not limited to the following platforms we use :

- virtual reality headsets eg. Meta Quest
- virtual worlds eg. Spatial, Styly
- chat app and forums eg. WhatsApp, Zoom, Google Meet, Discord
- collaborative apps and documents eg. Open Brush, Google Docs, Scaniverse, Miro Board.

a) When staff cannot see the content participants access or how they interact with others in a digital space.

We reduce the risk by...

- screen casting
- content management systems eg. Air Server, Abor XR
- kiosk mode - eg iOS Guided Access Mode
- staff are present in shared spaces eg: metaverse or chat rooms
- work offline or within closed networks
- time limited activities
- firewalls and blockers
- participants are made aware of digital safety and how to report abuse.
- staff are adequately trained.

b) When a member of staff works alone with participants in a digital space.

We reduce the risk by...

- having a chaperone (second member of staff present)
- using a company phone and email address for file sharing
- avoid engaging with chat or text messages with participants outside of working hours
- participants are made aware of digital safety and how to report abuse
- staff are adequately trained and DBS checked.

c) When third parties can access or view digital spaces without the knowledge or consent of participants.

We reduce the risk by...

- using private group, pages and channel when sharing work (not public)
- password protection eg. Zoom
- staff admin manage and approve who enters spaces
- discourage use of 'anonymous' avatars or profiles by staff and participants
- use of backgrounds and blurring in video calls

- participants are made aware of digital safety and how to report abuse
- staff are adequately trained.

2. Concerns working with digital data

This includes but is not limited to the following types of data we work with:

- AI-generated content from prompts
- Photos and videos
- 3D models taken from scanning techniques such as photogrammetry
- Audio recording including voice
- Written documents
- Meta data such as geolocation, time stamp, IP address
- Personal details collected from participants which may include name, address, email, mobile, DOB, medical information, financial information and protected characteristics
- Electric Medway passwords for online accounts
- Staff data

a) when the personal data of participants is accessed (seen, downloaded or copied) by someone who shouldn't have access to it.

We reduce the risk by...

- avoiding printed and visible docs
- use iPad for sign ups, or ask public to use own devices
- lock and password protect docs, set to prevent downloading, disable copy, paste and screen grabs
- use an encrypted WiFi network
- use good data management e.g. regularly delete or file content away
- participants are made aware of digital safety and how to report abuse.
- staff are adequately trained
- where consent is obtained from parents/carers, it is clear to them how we will use the participant's data including any work they have created for co-creation projects.

b) when the personal data of participants is used for malicious purposes.

We reduce the risk by...

- use of word block and filters within apps we use e.g. AI generators
- once files are rendered or baked in eg. 3D models and videos, keep only the final versions that have fewer editing options
- where possible, use avatars or other visual representation instead of identifiable faces and imagery
- remove unnecessary meta data from files e.g. geolocation

- where consent is obtained from parents/carers, it is clear to them how we will use the participant's data including any work they have created for co-creation projects
- use good data management e.g. regularly delete or file content away
- ensure we use our own encrypted networks and company-only accounts for file sharing
- staff only have access to data they need, for the projects they are working on
- participants are made aware of digital safety and how to report abuse.
- staff are adequately trained and DBS checked.

List of related internal documents

Available for staff on our shared Drive:

- HSE incident form
- Risk assessment template
- Content release form
- Equality, diversity and inclusion statement