



Media Trust Safeguarding Policy

Date of Policy	September 2024
Review Frequency	Annual
Date of next Review	September 2025

1.0 About

Media Trust (MT) carries out activities that may bring our employees, partners, and volunteers into regular contact with children or vulnerable adults. MT is committed to creating and maintaining the safest possible environment for any children and vulnerable adults we work with, as well as for our employees and volunteers, and ensuring all reasonable steps are taken to prevent them from harm.

1.1 Introduction

This policy applies to all members of staff whose duties bring them into contact with children or vulnerable adults. The term 'staff' in this policy relates to all employees, seconded staff, freelancers, contract and seasonal staff, volunteers, mentors, and students involved in Media Trust in any capacity and in any setting. Failure to comply with this policy may result in disciplinary action for employees and termination of their employment contract.

1.2 Legal considerations

MT will take into consideration all current and future legislation applying to this area and update this policy as needed.

1.3 Definitions

A "child" is a person who is yet to reach their 18th birthday. A "vulnerable adult" is a person aged 18 years or over who is unable to take care of themselves or to protect themselves from exploitation and may include the elderly or frail, those with learning disabilities, people who suffer from mental illness, people who have a physical disability, a substance misuser, people who are homeless or in an abusive relationship. An adult may become vulnerable, or stop being vulnerable, during the time in which they are involved with Media Trust.

1.4 Confidentiality

All information regarding children or vulnerable adults is highly confidential and should be treated as such at all times. Any relevant information that needs to be kept on file will be securely stored with access limited and should be shared only within appropriate

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professional contexts and in accordance with law. Please refer to MT's Data Protection Policy for further guidance.

1.5 Staff Training

All staff at Media Trust will be made aware of this policy. Media Trust also recognises its responsibility to invest in training for staff that work with children and vulnerable adults to give them the confidence and skills to safeguard children and vulnerable adults.

1.6 Designated Safeguarding Leads

The Designated Safeguarding Lead has responsibility for:

- Acting as the main contact within MT for the protection of children and vulnerable adults.
- Providing information and advice to MT staff on the protection of children and vulnerable adults.
- Supporting and raising awareness of this policy and related procedures.
- Ensuring all relevant information under this Policy is communicated to all relevant people.
- Keeping abreast of developments and understanding the latest information on data protection, confidentiality, and other legal issues that impact on the protection of children and vulnerable adults.
- Where necessary, establishing and maintaining contact with local statutory agencies including the police and social services.
- Working to maintain confidential records of reported cases and actions taken, and liaising with the relevant statutory agencies to ensure they have access to all necessary information.
- Taking the lead with specific allegations where there are suspicions of abuse, harm or neglect of a child or vulnerable adult.

Designated Safeguarding Lead Contact Details

Naomi White

Tel: 07873 495634

Email: naomiw@mediatrust.org

1.7 Consent

Media Trust will obtain parent/carers' permission for children under 16 and vulnerable adults and a self-certification form for 16 & 17 year olds. Template forms can be obtained from the Designated Safeguarding Lead.

Parents and Carers:

- Should have given their written consent for their child/vulnerable adult attendance
- Should provide information about any medical needs/allergies that the child/vulnerable adult may have and provide sufficient medication for the event if necessary
- Whose child/vulnerable adult is disabled, must provide information relating to any care needs, consent must be given if intimate care needs to be provided
- Should provide details about any specific dietary requirements
- Should provide accurate emergency contact details

2. Safer recruitment of staff who work with children and vulnerable adults

2.1 Criminal records

Any individuals involved in situations where they have sustained or prolonged unsupervised access to children or vulnerable adults are exempt from the Rehabilitation of Offenders legislation. This means that prospective employees, self-employed contractors, and volunteers must declare all criminal convictions, however long ago; and these will be taken into account when MT is deciding on their suitability for working with children and vulnerable adults. MT may require enhanced DBS disclosure for those who are in direct contact with children or vulnerable adults. MT also reserves the right to carry out a basic DBS check for those working in an administrative or support role that requires access to the data of children or vulnerable adults. In the event of a DBS check result that raises doubt as to the suitability of someone to work with children or vulnerable adults, MT reserves the right to terminate their employment immediately.

2.2 Recruitment

All job descriptions should clearly set out the extent of the relationship with and the degree of responsibility for the children or vulnerable adults with whom the person will have contact. Each job description should state if a DBS check is required for the role

2.3 Offer of Employment

Offers of employment or mentor roles working with children and/or vulnerable adults should be conditional upon satisfactory checks, including appropriate DBS references. Employment and character references should be obtained for each applicant (including volunteers) including where applicable, one from the applicant's most recent employer.

2.4 Induction

Newly appointed staff should be made aware of MT's Safeguarding Policy. They should also be made aware of the members of staff with safeguarding responsibilities. New staff who will be working with children and/or vulnerable adults will be required to complete the initial online or face to face safeguarding training required by Media Trust within their first six weeks at Media Trust. Further appropriate children and vulnerable adults training programmes will be provided where necessary.

2.5 Recruitment

Media Trust is committed to the safer recruitment of staff. This also includes ensuring the appropriate checks are made and records kept. Media Trust:

- Will ensure that safeguarding information is part of the induction programme for new employees, including ensuring staff working with children or vulnerable adults complete any training required by Media Trust.
- Will, through safer recruitment and selection processes, ensure that the appropriate level of DBS checks and references are taken up before commencement of post, where appropriate.
- Will maintain a record of all employees who have completed a DBS check
- Will ensure that DBS disclosures and references are kept secure and confidential.
- Will renew DBS checks at least every three years.
- Will, in consultation with the Designated Safeguarding Lead, make referrals to the Independent Safeguarding Authority (ISA) where there is a requirement.

2.6 Managers

Managers will monitor the staff they line manage to ensure this policy and procedures are adhered to. They:

- Are responsible for making sure that their staff are aware of, understand and act in accordance with this policy and related guidance, regardless of the hours their staff work.
- Must make sure that any contractors, agents, or other representatives whom they engage to undertake duties on Media Trust's behalf, which involve contact with young people and/or vulnerable adults understand and comply with this policy.
- Ensure that, when alcohol is present with children and/or vulnerable adults for whom they are responsible, steps are taken to prevent consumption.
- Will ensure DBS checks are made for all appropriate posts and renewed at least every three years.

2.7 All staff

- Should attend appropriate safeguarding children and vulnerable adults training if their role involves substantial access to children, young people, or vulnerable adults.
- Should not begin any unsupervised activity involving substantial access to children or vulnerable adults prior to a DBS check being processed and training being undertaken.
- Have a responsibility to disclose any convictions, cautions or bind-overs that may occur during their employment with Media Trust.
- Should be aware of what constitutes appropriate and inappropriate conduct for those employees in charge of children and vulnerable adults, as referred to in section 3.
- Should not lend money to children or vulnerable adults.
- Have a responsibility to inform the Designated Safeguarding Lead of any cause for concern.

2.8 Trustees

Trustees have a collective responsibility to ensure that safeguarding is prioritised within the organisation. Trustees must maintain a risk register which includes safeguarding risks and actions taken to mitigate those risks as far as reasonably possible.

3. Code of Behaviour

This behaviour code outlines the conduct expected of staff and volunteers from Media Trust and staff from other organisations who engage with children and young people through Media Trust and its activities.

3.1 Purpose

Following this code will help protect children and vulnerable adults from abuse and inappropriate behaviour. It will also help staff maintain the standard of behaviour expected of them and will reduce the possibility of unfounded allegations of abuse being made against them.

3.2 Upholding this code of behaviour

All staff are expected to report any breaches of this code to the Designated Safeguarding Lead under the whistle-blowing procedure or, if necessary, under child protection procedures.

Staff who breach this code of behaviour may be subject to Media Trust's disciplinary procedures. Any breach of the code involving a volunteer or member of staff from another agency may result in them being asked to cease working with Media Trust.

Serious breaches may also result in a referral being made to a statutory agency such as the police, the local authority children's social care department and/or the Independent Safeguarding Authority.

3.3 The role of staff

When working with children and vulnerable adults for Media Trust, all staff are acting in a position of trust. It is important that staff are aware that they may be seen as role models by children, young people, and vulnerable adults, and must act in an appropriate manner at all times.

3.4 The role of volunteers and mentors

Volunteers and mentors with Media Trust are expected to abide by this code of behaviour with the same expectations as for staff. Volunteers and mentors who are part of a particular programme may be provided with a programme-specific code of conduct which details the elements of this code of behaviour plus any other elements which are most relevant to their volunteering or mentoring role. This code of behaviour and any programme-specific code of conduct must both be adhered to.

3.5 Communication

Communication with children and young people is vital in establishing relationships built on trust. Those working with children and vulnerable adults should listen to what they are saying and respond appropriately. Children and vulnerable adults are entitled to the same respect as staff. MT encourages staff to demonstrate the standards of communication listed below:

- Always listen to and respect children and vulnerable adults
- Avoid favouritism
- Treat everyone fairly without prejudice or discrimination. Refer to MT's Equality & Diversity Policy for further guidance.
- Value and take participants' contributions seriously, actively involve children and vulnerable adults in planning activities wherever possible
- Always ensure language is appropriate and not offensive or discriminatory
- Provide examples of good conduct
- Recognise that special caution is required when discussing sensitive issues with children or vulnerable adults

Staff members must not:

- Patronise or treat children and vulnerable adults as if they are silly.
- Cause distress by shouting or using derogatory names.
- Make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children and vulnerable adults.
- Make inappropriate promises to children and vulnerable adults, particularly in relation to confidentiality.

- Act in a way that can be perceived as threatening or intrusive.
- Smoke, drink alcohol or use offensive language directly in the presence of a child or vulnerable adult.
- Discuss inappropriate aspects of their personal life.
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3.6 Physical contact and professional boundaries

There are occasions when it is appropriate for staff to have physical contact with children or vulnerable adults, but it is crucial that it is only done in ways that are appropriate to their professional role. Staff should therefore use their professional judgement at all times. MT encourages staff and volunteers/mentors to demonstrate the standards listed below:

- Ensure any contact with children and vulnerable adults is in relation to the work of the project.
- Ensure that whenever possible, there is more than one adult present during activities with children and vulnerable adults. Where this is not possible, for example a child or vulnerable adult specifically asks for or needs some private time or it is a one-to-one session, see section 3.7 – Lone Working.
- The extent of the contact should be made clear to the parent/carer and once agreed, should be undertaken with permission of the child or vulnerable adult.
- If a child or vulnerable adult is hurt or distressed, the staff member should do his/her best to comfort or reassure the affected person without compromising his/her dignity or doing anything to discredit the person's own behaviour.
- Respect a child's or vulnerable adult's right to personal privacy.

Staff must not:

- Hold a child or vulnerable adult in such a way that causes them pain.
- Physically restrain a child or vulnerable adult except to protect them from harming themselves or others.
- Encourage or take part in horseplay or rough games.
- Do things of a personal nature for that child or vulnerable adult that they can do for themselves – this includes changing their clothing or going to the toilet with them unless another adult is present.

3.7 Lone Working

There may be occasions when it might not be possible or appropriate for two adults to be present when working alone with children or vulnerable adults. This could be because the staff member is mentoring on a one-to-one basis, or they are left on their own whilst the other person deals with an urgent situation.

In such situations, the staff member should make use of other safeguards and make sure that:

- The extent of the contact should be made clear to the parent/carer and once agreed, should be undertaken with permission of the child or vulnerable adult.
- Someone else always knows the time and place when the staff member is alone with a child/vulnerable adult.
- If possible, ensure someone else is in close proximity – for example, meeting in a public place or making sure an adult is in the next room. The staff member should ensure they remain visible for example through a glass window or door and within hearing distance.

- The staff member and the child/vulnerable adult know what to do in an emergency, how to contact the parent/carer and/or another worker.
- The staff member has access to a phone or can summon help by calling out.
- The child/vulnerable adult is given permission to stop the one-to-one contact and knows how to complain or to get help.
- The staff member should stop the session if they become aware that the child/vulnerable adult is uncomfortable with being alone with the staff member concerned.
- If for any reason the staff member is not able to inform the parent/carer and person in charge in advance that they have been alone with a child/vulnerable adult, they should do so as soon as possible afterwards.
- If lone working was unplanned, the staff member should make a record of the fact that they were alone with a child or children, the reason for this, and what happened.

3.8 Contact outside of work

Contact should not be made with any of the children or vulnerable adults with whom MT is working for any reason unrelated to the particular project and social or other non-work-related arrangements should not be entered into with them.

Staff members should not:

- Give their home address to children or vulnerable adults.
- Contact children and vulnerable adults by telephone or email outside of working hours (apart from in extenuating circumstances and with approval from their line manager/Designated Safeguarding Lead).
- Contact children or vulnerable adults outside of the remit of their direct role within the organisation.
- Give children or vulnerable adults a lift in their car.

3.9 Social Networking and e-safety

MT recognises that its staff use the Internet outside of the work environment for various reasons and would like to remind staff of how to promote e-safety by:

- Supporting and encouraging everyone to use the opportunities offered by mobile phone technology and the Internet in a way that keeps themselves safe and shows respect for others.
- Ensuring that usernames, logins, and passwords are used appropriately and safely.
- Using only official email accounts and phone numbers provided via Media Trust and monitoring these, as necessary.
- Where volunteers are using their own personal contact details and information (e.g., their personal email address), they should monitor it appropriately and keep details secure. Personal contact details should never be provided to children aged under 18 – only work contact details should be used.
- When emailing a child aged under 18, ensure that another staff member is also copied into the email, and that the parent or carer of the child under 18 is aware that this communication is taking place.
- When phoning or conducting a digital meeting with a child under 18, ensure that someone else is always present in the same room.

- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given. No details which could identify a child aged under 18 should be included when images or videos are shared publicly (e.g., only their first name and not surname should be used).
- If someone shares content on their private personal social media account, this should not be shared more widely without the consent of the individual and (if they are a child aged under 18) their parent or carer.
- Not engaging on any social media platform with somebody who does not meet the age requirement for that particular platform.
- Staff should use their professional judgment in assessing the suitability of social media tools to be used in the course of MT's work with children and vulnerable adults.
- If Internet access is required as part of the work, staff are asked to ensure that steps are taken to protect children from accessing inappropriate web content,
- Not initiating contact with a child or vulnerable adult using social media
- Not sharing personal information with children or vulnerable adults through webcam, photographs, blogs etc.
- Not encouraging or pressuring others into sharing images, videos, or details online, whether as a private message or publicly.
- Not sharing inappropriate material (e.g., pornography) and being careful when sharing material which discusses sensitive topics or could be perceived as offensive, harmful, or discriminatory.
- Not sharing or asking for personal financial information unless it is through a secure channel for a necessary purpose such as claiming expenses.
- When conducting remote meetings digitally (e.g., using Zoom), the same principles should be applied as detailed throughout this Policy, e.g., conducting the meeting in an appropriate space, not smoking, or drinking alcohol on camera.

MT will deal firmly, fairly, and decisively with any examples of inappropriate ICT use, complaints, or allegations, whether by an adult or a child/vulnerable adult (this may include breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse).

MT is aware that much of its material is post-watershed material and may deal with topics that are unsuitable for children or vulnerable adults and can be distressing (e.g., wife beating, AIDS awareness, prostitution). Our managers are asked to ensure that steps are taken to ensure such subjects are dealt with sensitively and in an appropriate manner when a child or vulnerable adult will be seeing or hearing such material.

3.10 Confidential information

Anyone who is likely to have access to confidential material regarding children, young people, or vulnerable adults, or any of the charities on behalf of whom Media Trust is working, is reminded that they have signed a non-disclosure agreement as part of their contract of employment.

4. Procedure for children and vulnerable adults at possible risk of abuse

This procedure applies to any member of staff who may be concerned about the safety and protection of a child or vulnerable adult.

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4.1 Purpose

We aim to ensure those children or vulnerable adults who visit Media Trust or attend Media Trust events or programmes, receive the protection, and support they need if they are at risk of abuse.

4.2 Dealing with incidents and suspicions of abuse

Staff members should report, record, and inform their line manager/ the Designated Safeguarding Lead if the following occurs:

- A child or vulnerable adult makes an abuse/harm/neglect disclosure (in this case refer to and inform the Designated Safeguarding Lead by telephone as soon as possible ensuring it is on the same day – see section 4.3 Dealing with abuse).
- A staff member/another learner accidentally or deliberately hurts a child or vulnerable adult.
- First aid is performed on a child or vulnerable adult.
- A child or vulnerable adult seems very distressed.
- A child or vulnerable adult significantly misunderstands or misinterprets something that a staff member/another child or vulnerable adult has said.
- A child or vulnerable adult/staff member/volunteer is/appears to be sexually aroused by a staff member/volunteer/child or vulnerable adult.
- A child or vulnerable adult is restrained in self-defence.

A full record should be made using the prescribed cause for concern form and reported to a Designated Safeguarding Lead. This should include information relating to the date, time and place where the incident happened, the staff member's name and the names of any others present, the name of the complainant and where different the name of the child or vulnerable adult who has been involved in the incident, the nature of the incident and a description of any injuries observed.

It is NOT MT's responsibility to investigate suspicions or decide whether abuse has taken place. MT's role is to act if there is a cause for concern and to report it to the appropriate authority to investigate and take any necessary action.

Any allegations of abuse made against anyone working for Media Trust will be thoroughly investigated and dealt with through its disciplinary procedure. Serious breaches may lead to dismissal.

The Designated Safeguarding Lead will appropriately record an allegation or reported incident. He/she will be responsible for contacting the statutory child protection agency such as the Local Safeguarding Children Board or the police if necessary.

4.3 Dealing with Abuse

The 4 Rs are **Recognise, Respond, Record and Refer** (in accordance with the NSPCC (National Society for the Prevention of Cruelty to Children) framework). Whether the abuse occurs on Media Trust premises, in the home, or in any other setting (including digitally), the 4 Rs should be followed when dealing with the suspected abuse of children or vulnerable adults.

Recognise

The ability to recognise signs that might indicate abuse is of fundamental importance. Staff members should contact the Designated Safeguarding Lead immediately if they have any concerns about the following:

- Excessive tiredness

- Aggressive behaviour
- Nervous behaviour
- Bite or burn marks
- Lack of confidence
- Stealing food
- Fear of making mistakes
- Self-harm
- Flinching
- Sudden behaviour changes
- Frequent absences
- Sexualised language
- Hinting at secrets
- Fear of a specific individual

Respond

No report or concern about possible abuse should ever be ignored. In order to determine the most appropriate response, the context of the disclosure must be determined.

Information received about a child or vulnerable adult might fall into one of the categories below:

- Suspicion/allegation of abuse, harm, or neglect where an MT member of staff is the alleged perpetrator.
- Suspicion/allegation of abuse, harm, or neglect where a child, young person or vulnerable adult is the alleged perpetrator.
- Suspicion or allegation of abuse, harm, or neglect where a third party is the alleged perpetrator.
- Suspicion/allegation of inappropriate conduct.

It is vital to listen carefully to any information that a child, young person or vulnerable adult discloses with reference to abuse, harm, or neglect. If a child, young person, or vulnerable adult chooses to disclose this information to a staff member, the staff member must make them aware that if it is concerning something which puts either the child, young person, or vulnerable adult at harm or in danger, the staff member will have to tell the appropriate person.

Whilst listening, the following good practice is essential:

During the disclosure:

- React calmly, try not to show disbelief or project other emotional reactions.
- Demonstrate you are listening by demonstrating attentiveness and concern.
- Do not ask leading questions; instead, ask by repeating back what the person has said in their own words.
- Take all information given from the person seriously.
- Tell the person that they are never to blame for abuse and that they have the right to tell somebody.
- Reassure the person they have done the right thing in reporting their concerns, and state you will do everything you can to support them.

Do not:

- Make unrealistic promises
- Introduce personal information from your own experiences
- Apportion blame or pass judgement
- Guarantee confidentiality

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- Tell the person that ‘everything will be alright’

After the disclosure:

- Tell the person sharing the disclosure the concern they have raised will be recorded and passed onto a limited ‘need-to-know’ basis.
- Inform a Designated Safeguarding Lead immediately.
- Make a full record of what has been said, heard or seen (please see the Record section below) – you can also conduct this while the disclosure is being made if appropriate and possible.
- Ensure that the complainant and the subject of the allegation are treated in line with this policy.

Do not:

- Verbally speculate about what might have happened, with anyone.
- Approach an alleged abuser or make comments about him/her to the child or vulnerable adult.

Record

The staff member should report their concerns to the Designated Safeguarding Lead that working day. In the event this is not possible, they should report their concerns to their line manager. In all cases, the recipient of the report should, without delay and having carefully recorded the information, report this him/herself to the Designated Safeguarding Lead. Once the staff member has reported concerns about the abuse to any of the colleagues mentioned above, the responsibility for taking any further decisions and/or actions resides with them. It is their responsibility to make further decisions. Once the staff member has spoken to a Designated Safeguarding Lead, they should make notes using the cause for concern form.

Refer

This is the responsibility of a Designated Safeguarding List only – or of a member of the senior management team in extenuating circumstances.

Please note concerns should be discussed with the family unless:

- The view is that a family member might be responsible for abusing a child or vulnerable adult.
- Someone may be put in danger by the parents or carers being informed.
- Informing the family might interfere with a criminal investigation.

If any of these circumstances apply, consult with the local authority children’s social care department, or adult services in the case of a vulnerable adult, to decide whether or not discussions with the family should take place.

The only agencies that can investigate child protection cases are the police, social services, and the NSPCC.

4.4 Escalation of concerns

If a member of staff or volunteer is in any way concerned that the disclosure or report which they have made has not been handled appropriately or sufficiently, they should refer to Media Trust’s Complaints Policy.

4.5 Useful Contact Details

Westminster

Please call 020 7641 7668 and ask to speak to the Duty Child Protection Adviser
Email lado@westminster.gov.uk

Named LADO: Aqualma Daniel

Safer Organisations Manager & Local Authority Designated Officer (LADO) Kensington and Chelsea and Westminster

Tel : 07870 481712

Email Aqualma.Daniel@rbkc.gov.uk

Police

Victoria Police Station, 202-206 Buckingham Palace Rd, Belgravia, London SW1W 9SX

Non emergency number – 101

[Website](#)

NSPCC

Helpline: 0808 800 5000

E-mail: help@nspcc.org.uk

[Website](#)

IN AN EMERGENCY ALWAYS DIAL 999

4.3 Different Types of Abuse

Children and vulnerable adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including sexual, physical, and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take.

Media Trust views the following as being the main categories of abuse:

Physical abuse

Is violence causing injury or occurring regularly. It happens when:

- A child or vulnerable adult is hurt or injured by being hit, shaken, squeezed, thrown, burned, scalded, bitten, or cut.
- Someone tries to drown or suffocate a child or vulnerable adult.
- Someone gives a child or vulnerable adult poison, alcohol, or inappropriate drugs.
- Someone fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

In some cases, the injuries will be caused deliberately. In others they may be accidental but caused by the child or vulnerable adult being at risk.

Sexual abuse

Occurs when someone uses power or control to involve a child or vulnerable adult in sexual activity in order to gratify the abuser's own sexual, emotional, or financial needs or desires.

It may include:

- Forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening.
- Encouraging children or vulnerable adults to behave in sexually inappropriate ways.

- Showing children or vulnerable adults' pornographic material or involving them in the production of such material.
- Involving children or vulnerable adults in watching other people's sexual activity or in inappropriate discussions about sexual matters.

Emotional abuse

Is persistent or severe emotional ill-treatment of a child or vulnerable adult that is likely to cause serious harm to his/her development. It may include:

- Persistently denying the child or vulnerable adult love and affection.
- Regularly making the child or vulnerable adult feel frightened by shouts, threats, or any other means.
- Hurting another person or a pet in order to distress a child or vulnerable adult.
- Being so over-protective towards the child or vulnerable adult that he/she is unable to develop or lead a normal life.
- Exploiting or corrupting a child or vulnerable adult, e.g., by involving him/her in illegal behaviour.
- Conveying to a child or vulnerable adult the message that he/she is worthless, unlovable, inadequate, or his/her only value is to meet the needs of another person. This may or may not include racist, homophobic, or other forms of abuse.

Neglect

Involves persistently failing to meet a child's or vulnerable adult's physical, psychological, or emotional needs. It may include:

- Failing to ensure that a child's or vulnerable adult's basic needs for food, shelter, clothing, health care, hygiene and education are met.
- Failing to provide appropriate supervision to keep a child or vulnerable adult out of danger. This includes lack of supervision of particular activities or leaving a child alone in the house.

4.4 Relationships and Sexual Abuse

The age of consent (the legal age to have sex) in the UK is 16 years old. The laws are there to protect children. They are not there to prosecute under-16s who have mutually consented sexual activity but will be used if there is abuse or exploitation involved.

To help protect younger children, the law says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be subject to penalties set out under the Sexual Offences Act 2003.

The law also gives extra protection to young people who are 16 to 17 years old. It is illegal to:

- Take, show, or distribute indecent photographs.
- Pay for or arrange sexual services.
- For a person in a position of trust (for example MT staff) to engage in sexual activity with anyone under the age of 18.

Conducting a sexual relationship with a child or vulnerable adult or indulging in any form of sexual contact with a child or vulnerable adult using the services of Media Trust represents a serious breach of trust on the part of the staff member and is not acceptable under any circumstances.

- If a child or vulnerable adult makes a comment about you being good-looking or seems to be expressing intent to initiate a relationship with you, immediately explain that this is an inappropriate conversation due to professional boundaries. Then inform your line manager/Designated Safeguarding Lead.

- Be alert to the possibility of children or vulnerable adults being romantically/sexually attracted to you, and to your words and actions being misinterpreted.
- If a child or vulnerable adult who is a friend or relative, or with whom you are in a romantic relationship, is due to join MT, inform your line manager or HR or a Designated Safeguarding Lead.

Members of staff must not:

- Rely on their reputation or that of the organisation to protect them.
- Develop inappropriate relationships such as contact with children or vulnerable adults that is not a part of the work of MT or agreed with the manager or leader of a youth organisation.
- Allow or engage in inappropriate touching of any kind.
- Allow or engage in sexually suggestive behaviour within a person's sight or hearing or make suggestive remarks to or within earshot.
- Give or show anything that could be construed as pornographic.
- Buy gifts which could be in any way considered as a bribe or inducement.
- Socialise with or develop friendships with children or vulnerable adults.
- Initiate romantic, sexual, or emotionally dependent relationships with children or vulnerable adults.

5. Data

Only staff with appropriate permission and security clearance levels (i.e., DBS checks) will have access to restricted, personal sensitive data regarding children and vulnerable adults. This data should be treated as sensitive and handled in accordance with MT's Data Protection Policy.

6. Implementation, monitoring, and review of this policy

Media Trust's Chief Executive has overall responsibility for implementing and monitoring this policy, which will be reviewed on an annual basis following its implementation and specifically whenever there are relevant changes in legislation or to MT's working practices. The board will also review this policy yearly. Any queries or comments about this policy should be addressed to the Chief Executive.