T 020 7374 8485 (London)
T 0161 521 0033 (Manchester)
E info@createarts.org.uk
createarts.org.uk

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Updated October 2026

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INTRODUCTION

All organisations working with children[1] and vulnerable adults must ensure that:

- The welfare of the child/vulnerable adult is paramount (this is the first duty set out in the Children Act 1989 (Child Protection) and The Police Act of 1997 (Vulnerable Adults))
- All children/vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs, sexual identity and/or other characteristics have the right to protection from abuse.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff (paid/unpaid) must be appropriately police-checked, trained and supervised to work with children/vulnerable adults.

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY AIMS

The aim of Create's Safeguarding Children and Vulnerable Adults Policy is to promote good practice:

- Providing children and vulnerable adults with appropriate safety and protection whenever they are in contact with Create; and
- Allowing all staff/volunteers to make informed and confident responses to specific child/vulnerable adult protection issues.

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY STATEMENT

Create is strongly committed to promoting the welfare of children and vulnerable adults. The charity's activities help meet the five key outcomes for children that are set as the framework for all children's services in the Children Act 2004:

- Be healthy
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well-being

The charity's activities are also in accordance with best practice in vulnerable adult safeguarding. This policy document focuses on the outcome 'staying safe' with regards to both children and vulnerable adults.

Create has a duty of care to all the children and vulnerable adults who take part in its activities. It will do all in its power to protect children and vulnerable adults from harm. As many of the children / adults it reaches are disabled or vulnerable in other ways, the charity has to be exemplary in its practice and especially vigilant for abuse. To ensure the protection and safety of all children / vulnerable adults involved with Create, all staff (salaried and freelance), contractors and volunteers of Create are required to adhere to this Safeguarding Children and Vulnerable Adults Policy. Create will take any failure to follow this Policy very seriously and, in the case of Create's staff, any breaches of it could result in disciplinary sanctions up to and including dismissal. However, this policy is not contractual and Create may at its discretion vary or replace it.

[1] For this policy, children are defined as any person up to the age of 18.

WHAT IS CHILD PROTECTION?

A child is defined as a person under the age of 18 (The Children Act 1989). Every child has at all times and in all situations the right to feel safe and protected from any situation or practice that might lead to physical or psychological harm. This includes abuse from other children, usually known as bullying.

WHAT IS VULNERABLE ADULT PROTECTION?

The Police Act of 1997 defines a vulnerable adult as a person aged 18 or over who is receiving services of a type listed in (A); in consequence of a condition of a type listed in (B); and/or has a disability of a type listed in (C) below:

(A) Services

- accommodation and nursing or personal care in a care home;
- personal care or nursing or support a person to live independently in his/her own home;
- any services provided by an independent hospital, independent clinic, independent medical agency or NHS body;
- social care services;
- any services provided in an establishment catering for a person with learning difficulties.

(B) Conditions

- a learning or physical disability;
- a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs;
- a reduction in physical or mental capacity.

(C) Disability

- a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
- severe impairment in the ability to communicate with others;
- impairment in a person's ability to protect him/herself/themselves from assault, abuse or neglect.

PROMOTING GOOD PRACTICE

Child and vulnerable adult abuse, particularly sexual abuse, can arouse strong emotions. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Although most child abuse takes place within families, it can also occur in other settings such as schools, hospitals, care homes, online and during creative arts projects. Some individuals will actively seek employment or voluntary work with children and vulnerable adults in order to harm them. An artist, project manager, teacher, youth worker or volunteer will have regular contact with children and vulnerable adults and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document.

GOOD PRACTICE GUIDELINES

All personnel should be required to demonstrate exemplary behaviour in order to protect children and vulnerable adults, and this will also help staff protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate. Good practice means:

- Ensuring Create and community partner personnel have each other's Designated Safeguarding Lead's name, contact information, DBS number and issue date should there be a safeguarding concern;
- Ensuring safeguarding is being discussed at pre-planning stages of projects with community partners;
- Ensuring that there is a support worker / teacher / carer / parent supervising the participants who are attending the creative arts session at all times;
- Always working in an open environment (eg avoiding private or unobserved situations and encouraging open communication with no secrets);
- Ensuring children and vulnerable adults are informed at the beginning of each workshop who they can speak to if they have any concerns / worries / complaints;
- Ensuring children and vulnerable adults follow guidelines with regards to location and visibility of personal information when video conferencing;
- Treating all children and vulnerable adults with respect and dignity, regardless of disability, ethnicity, gender, age, religion or belief, health, sexual identity or other characteristics;
- Always putting the welfare of each person first;
- Maintaining a safe and appropriate distance (eg it is not appropriate for staff or volunteers to have an intimate relationship with a child or vulnerable adult);
- Ensuring no personal information is shared between children and vulnerable adults or staff when video conferencing;
- Ensuring all personnel comply with Create's Social Media Policy
- Making relationships with children and vulnerable adults that are based on trust, honesty and clear boundaries, aiming for a balance that empowers children / vulnerable adults to be consulted and included in decision-making, at the same time as making clear which decisions have to be made by adults, eg for health and safety;
- Making creative arts fun and enjoyable;
- Approaching participants from the front or side of their body when assisting them, instead of from behind;
- If physical contact is needed to guide a child / vulnerable adult, using the 'caring c' (thumb and pointer finger with a light touch instead of full hand);
- Involving support workers / teachers /parents / carers wherever possible eg encouraging them to take responsibility for their children / adults in changing rooms/backstage at performances. If groups have to be supervised in changing rooms, always ensure parents, teachers or project managers work in pairs;
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of children or vulnerable adults;
- Giving enthusiastic and constructive feedback rather than negative criticism (research has shown that children thrive in families and other social environments which have "high emotional warmth where children are rarely criticised", and that children are more likely to be abused in environments which have "low emotional warmth, where they are frequently criticised");
- Recognising the developmental needs and capacity of children and disabled adults – avoiding pushing them against their will; and
- Looking out for whether children / vulnerable adults are being bullied by others in the group.

PRACTICES TO BE AVOIDED

The following should be **avoided** except in emergencies:

- spending any time alone with children/vulnerable adults away from others;
- transporting a child or vulnerable adult by car;
- administering first aid or other medical treatment.

If cases arise where these situations are unavoidable, they should be with the full knowledge and consent of Create's Chief Executive Nicky Goulder or Create's Designated Safeguarding Lead Kristian Sakulku.

You should undertake these actions only if there is an emergency (eg a child sustains an injury or needs to go to hospital) and if the child's/vulnerable adult's usual carer is not present or able to help. In these cases, you or a colleague should ensure that the child's/vulnerable adult's parent or carer and Create's Chief Executive Nicky Goulder or Create's Designated Safeguarding Lead Kristian Sakulku are informed as soon as possible.

PRACTICES NEVER TO BE SANCTIONED

The following should **never** be sanctioned. You should never:

- Engage in rough, physical or sexually provocative activities, including horseplay;
- Share a room with a child / vulnerable adult;
- Allow or engage in any form of inappropriate touching;
- Allow children / vulnerable adult to use inappropriate language unchallenged;
- Make sexually suggestive comments to a child / vulnerable adult, even in fun;
- Reduce a child / vulnerable adult to tears as a form of control;
- Shout at a child / vulnerable adult, unless absolutely necessary to be heard (eg in a group in a large space or outdoors) or to prevent injury to the child / vulnerable adult (eg if a child is about to step into road traffic);
- Allow allegations made by a child / vulnerable adult to go unchallenged, unrecorded or not acted upon;
- Engage with a child / vulnerable adult through public or private posts or direct messaging on any social media platforms;
- Do things of a personal nature for children or vulnerable adults that they can do for themselves; and
- Invite or allow children/vulnerable adults to stay with you at your home unsupervised.

NB It may sometimes be necessary for staff or volunteers to do things of a personal nature for children / vulnerable adults, particularly if they are young or disabled. These situations are rare for Create employees / freelancers as they should usually be the responsibility of the adult who is supervising the child(ren) / adults. These tasks should only be carried out with the full understanding and consent of parents/carers and the person involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him / her / them about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child/vulnerable adult to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

For further information regarding Child and Vulnerable Adult Abuse see Appendix I and II.

TAKING ACTION ABOUT CONCERNS

In any situation where you are concerned about the welfare of a child / vulnerable adult, a general rule of thumb is:

- don't over-react
- don't under-react

Take the following steps:

(i) observe
(ii) report
(iii) record
(iv) respond

(i) Observe

Observe to be as clear as you can about the cause of your concern. Consider the common signs of abuse set out in Appendix II. What is it about the child's / vulnerable adult's behaviour, appearance, health, emotions or social interaction that worries you? Or what is it about an adult's behaviour towards children / vulnerable adults that you feel may be harmful or abusive? It is not up to you to decide whether abuse has taken place (this is for doctors, social workers, the police and ultimately the Courts to assess) and you should not spend a long time gathering observations before you report your concerns: you just need to be as clear and specific as you can about what you have seen or heard. The more precise and concrete you can be in giving examples or evidence, the easier it will be for child / vulnerable adult protection professionals to respond appropriately.

If a child / vulnerable adult tells you directly that they are being abused or bullied:

- Listen carefully. If possible, write down the child's/vulnerable adult's exact words so that you can report them accurately.
- Do not try to probe or lead.
- Assure the child / vulnerable adult that you have taken seriously what they have said and that you or another appropriate person will respond to them soon.

Child Protection: Do NOT promise the child that you will keep the information secret: you have to tell the appropriate authorities. If you give the child false reassurances of secrecy, the child may lose trust in adults and withdraw allegations that need investigation.

Vulnerable Adults: Do NOT promise the vulnerable adult that you will keep the information secret. Create's staff and volunteers must make it clear that they will have to discuss the concerns with their supervisor. If a vulnerable adult expresses the wish for the concerns raised not to be pursued, if possible, this should be respected. However, the decision to respect the individual's wishes should be made depending on the level of risk to the individual and their capacity to understand the decision.

See more about listening to children and vulnerable adults in Appendix III.

(ii) Report

Child Protection: Report your concerns as quickly and clearly as possible. Child protection is one of the very few grounds on which you can break normal rules of **confidentiality** – that is, you can and should report concerns about a child without their parents'/guardian's permission, and/or report information about a colleague or member of staff without their permission. The welfare of the child is paramount: it overrides the rights of others to keep information private. Clearly, though, concerns about child abuse are highly sensitive information, which should be reported on a need-to-know basis, only to the appropriate authorities. You should consult with and report to Designated Safeguarding Lead, Deputy Safeguarding Lead, Create's Chief Executive or Trustee with any issues.

Vulnerable Adults: Report your concerns as quickly and clearly as possible to the appropriate authorities within Create. It is not advisable to speak to the community partner, which has a responsibility for the vulnerable adult. If you feel that a vulnerable adult is at immediate risk, and/or you cannot consult Create's Designated Safeguarding Lead or Chief Executive, you can take action by calling relevant emergency services (police, GP or ambulance).

For Create's front-line contractors, staff and volunteers, this will mean speaking to:

- **Designated Safeguarding Lead Kristian Sakulku, Deputy Safeguarding Leads Hannah Clayden / Manfred Meyer or Chief Executive Nicky Goulder** (contact details on page 11). Do this as soon as you can by telephone or in person. If you are at a project in a school or community setting, you may wish

to speak first to the Create project manager, who will then speak to the Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive at the office. The Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive should always be your first point of contact if (a) your concern is about a volunteer or member of staff or (b) you are unsure about whether or not your concern is worth reporting: **If in doubt – is this concern serious or not? - always consult Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive.**

- **The community partner** – the school, hospital or other organisation where the arts activity is being held and which has responsibility for the child or vulnerable adult on a day-to-day basis. In general, you should speak to colleagues at Create **before** speaking to the community partner. Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive will then inform the community partner's Designated Safeguarding Lead on your behalf. However, where you feel that a child/vulnerable adult is at immediate risk, it may be appropriate to inform the community partner first, so that they can take immediate action (eg if you think a child is being physically abused by a parent/carer and should not be allowed home from school).

In general, Create's front-line staff and volunteers are not expected to report concerns directly to child protection services - the local authority's Children's Services Department (formerly Social Services) and/or the police. Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive and/or the community partner will make the initial contact with these child protection/vulnerable adult professionals. A social worker or police officer will assess the information received and decide whether or not to investigate further. If necessary, they may then contact you to ask you directly about your concerns.

In general, Create's front-line staff should NOT report concerns to **parents or carers**. Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive, the community partner and/or child protection/vulnerable adults professionals will decide when and who should speak to the family. Bear in mind that a parent or carer may themselves be the perpetrator of the abuse.

Child protection services can always be contacted through the switchboard of the local council.
If you can see that a child or vulnerable adult is in immediate danger, dial 999 and ask for the police. Police have the power to remove a child to a place of safety if necessary.

If you are worried about sharing your concerns about abuse (eg because you believe that someone senior in Create or community partner organisation may be implicated), contact Simone Wright, the Board-appointed Trustee responsible for issues concerning Safeguarding Children and Vulnerable Adults (contact details on page 11). As a final resort, speak directly to child protection services or the police, or ring the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111.

(iii) Record

Record your concerns in writing as soon as you can. If time allows, write notes about your observations before you report them. This will help you to be as precise as possible in making your report. If your concern is based on what a child/vulnerable adult or someone else has said, write it down immediately so that you can report the exact words, and keep these notes, as (in rare serious cases) they may be needed later as evidence.

Once you have reported your concerns to Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive, you need to write them down in the format set out in Appendix V which will be sent to you. Return the completed form to Create within 24 hours or ask for help from Create's Designated Safeguarding Lead in how to complete it. Repeat all the information you have already given by phone. Be as factual and precise as you can. If you wish to comment or draw conclusions, distinguish these clearly from the factual information (eg by writing "In my opinion, ...").

As far as possible, make sure that the record includes:-
- The child's / vulnerable adult's name, age and date of birth;

- Whether you are reporting your own concerns or someone else's;
- The nature of the allegation. Include dates, times, any special factors and other relevant information;
- Make a clear distinction between what is fact, opinion or hearsay;
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes;
- Details of witnesses to the incidents;
- The child's / vulnerable adult's account, if it can be given, of what has happened and how any bruising or other injuries occurred;
- Have the parents / carers been contacted?
- If so what has been said?
- Has anyone else been consulted? If so record details;
- If the child / vulnerable adult was not the person who reported the incident, has the child/vulnerable adult been spoken to? If so what was said?
- Has anyone been alleged to be the abuser? Record details; and
- Contact details of anyone else you have informed (eg social worker or police officer).

(iv) Respond

In general, the responsibility of Create's front-line staff and contractors ends with reporting and recording. It is the job of the community partner or child protection professionals to take action to protect the child/vulnerable adult and the job of Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive to address any concerns about Create staff, artists or volunteers.

If the concerns you have reported turn out to be very serious, you may be required to attend a **Strategy Meeting** (at which social workers and police will plan how to carry out their investigation – especially where sexual abuse is suspected and it is crucial to make a planned approach to the potential abuser and victim) or a **Case Conference** (at which the family and professionals assess the available information and make a plan to protect the child / vulnerable adult). In very rare cases, you may be required to give evidence in court. In any of these circumstances, you will be accompanied and supported by one of Create's Designated Safeguarding Lead, Deputy Safeguarding Lead or Chief Executive.

Most concerns about children's/vulnerable adult's welfare never reach such formal proceedings. Many concerns lead to no further action or to informal support to families by relatives, schools or health professionals. Create's role is to report the concerns, not to determine the outcome (except when the investigation is about a Create member of staff).

Where sexual abuse, emotional abuse or neglect are likely, child protection services or the police will usually undertake careful planning before intervening in a family or other setting. It is usually only **physical abuse** that requires immediate or emergency action. If a child/vulnerable adult is being physically abused, the next abuse may cause more serious injury or even death. So, it is important that if you observe signs of physical abuse that you act swiftly. For example, if you find that a worker is physically abusing children / vulnerable adults, you may need to remove the children / vulnerable adults from this worker immediately. Or, if a child / vulnerable adult says that they are being physically abused in their family, you may need to tell the school / community partner not to allow the child / vulnerable adult to return home that evening.

If you can see that a child / vulnerable adult is in immediate danger, dial 999 and ask for the police. Police have the power to remove a child/vulnerable adult to a place of safety if necessary.

INCIDENTS WHEN YOU COULD BE ACCUSED

If any of the following occur, you should report this immediately to another colleague and record the incident. You should also ensure the supervising adult/parents of the child/adult are informed:

- If you accidentally hurt a child / vulnerable adult;

- If a child / vulnerable adult seems distressed in any manner;
- If a child / vulnerable adult appears to be sexually aroused by your actions; and / or
- If a child / vulnerable adult misunderstands or misinterprets something you have done as abusive.

RESPONDING TO ALLEGATIONS OR SUSPICIONS ABOUT CREATE STAFF AND VOLUNTEERS

It is not the responsibility of anyone working at Create in a paid or unpaid capacity to decide whether or not child or vulnerable adult abuse has taken place. There is a responsibility, however, to act on any concerns through contact with the appropriate authorities.

Create will assure all staff / volunteers that it will fully support and protect anyone who reports a genuine concern that a colleague or artist is, or may be, abusing a child or vulnerable adult.

Where there is a complaint against a member of staff/artist there may be three types of investigation:

- A criminal investigation,
- A child or vulnerable adult protection investigation, or
- A disciplinary or misconduct investigation.

The results of the police and child or vulnerable adult protection investigation may well influence the disciplinary investigation, but not necessarily.

ACTION IF THERE ARE CONCERNS

1. Concerns about poor practice:

- If, following investigation, the allegation is clearly about poor practice, Create's Designated Safeguarding Lead will deal with it as a training need or a misconduct issue.
- If the allegation is about poor practice by Create's Designated Safeguarding Lead, or if the matter has been handled inadequately and concerns remain, it should be reported to Create's Chief Executive who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

2. Concerns about suspected abuse:

- Any suspicion that a child / vulnerable adult has been abused by either a member of staff or a volunteer should be reported to Create's Designated Safeguarding Lead, who will take such steps as considered necessary to ensure the safety of the child/vulnerable adult in question and any other child/vulnerable adult who may be at risk.
- Create's Designated Safeguarding Lead will refer the allegation to the social services department who may involve the police, or go directly to the police if out-of-hours.
- The parents or carers of the child / vulnerable adult will be contacted as soon as possible following advice from the social services department.
- Create's Designated Safeguarding Lead should also notify Create's Chief Executive who will deal with any media enquiries.
- If Create's Designated Safeguarding Lead is the subject of the suspicion / allegation, the report must be made to the Chief Executive or, in her absence, the Board-appointed Trustee for Safeguarding Children and Vulnerable Adults who will refer the allegation to Social Services.

CONFIDENTIALITY IN INVESTIGATIONS ABOUT CREATE STAFF AND VOLUNTEERS

Create will make every effort to ensure that confidentiality is maintained for all concerned.

As soon as an allegation is made, Create's Designated Safeguarding Lead will inform the community partner for the project (eg school) and co-operate with them in informing the Children's Services Department and/or the police. It is likely that these child/adult protection agencies will decide when and how to inform the child, parents and carers, potential perpetrator and any other relevant people (eg doctor). Create will provide any information required to ensure the protection of the child / vulnerable adult and will co-operate fully with any police or social work investigation of the perpetrator.

Within Create, the Designated Safeguarding Lead will keep the Chief Executive informed of all developments, who will keep the Board-appointed Trustee informed.

Information about the incident will be stored in a secure place with limited access to designated people, in line with data protection laws (eg that information is accurate, regularly updated, relevant and secure).

INTERNAL ENQUIRIES AND SUSPENSION

- Create's Chief Executive will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and local authority inquiries.
- Irrespective of the findings of the local authority or police inquiries, Create's Disciplinary Committee will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, Create's Disciplinary Committee must reach a decision based upon the available information to decide whether the allegation is true. The welfare of the child/vulnerable adult will remain of paramount importance throughout.

SUPPORT TO DEAL WITH THE AFTERMATH OF ABUSE

- Consideration will be given to the kind of support that children, vulnerable adults, parents, carers and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling Directory is available from The British Association for Counselling and Psychotherapy, BACP House, 15 St John's Business Park, Lutterworth, Leicestershire, LE17 4HB Tel: 01455 883300, E-mail: bac@bacp.co.uk, Internet: http://www.bacp.co.uk.
- Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.

ALLEGATIONS OF PREVIOUS ABUSE

Allegations of abuse may be made some time after the event (eg by an adult who was abused as a child or by a member of staff who is still currently working with children).

Where such an allegation is made, Create will follow the procedures as detailed above and report the matter to the Children's Services Department or the police. This is because other children/vulnerable adults may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse of a child or vulnerable adult is automatically excluded from working with children/vulnerable adults. This is reinforced by the details of the Protection of Children Act 1989 and the Police Act of 1997.

USE OF PHOTOGRAPHIC/FILMING EQUIPMENT

There is evidence that some people have used leisure activities as an opportunity to take inappropriate photographs or film footage of children, disabled people and adults in vulnerable positions. All staff should be vigilant and any concerns should to be reported to Create's Designated Safeguarding Lead.

Videoing as part of a creative arts activity: there is no intention to prevent artists and project managers using video equipment as part of a creative arts activity. Children/vulnerable adults and their supervising

adult/parents/carers should, however, be made aware that this is part of the artistic programme and parental /carer consent should be secured in writing.

See Appendix IV for further guidelines and Appendix VI for a media consent form.

In the case of video conferencing for creative arts activity, video conferences will be private and password protected with participants directly invited. Rooms will be "locked" once all participants are in attendance to ensure uninvited parties are unable to attend. Video conferencing has strict set up guidelines, which include disabling the ability for participants to share screens and to chat privately.

Children/vulnerable adults must be made aware that they must not take, use, share, publish or distribute images of others without their permission.

RECRUITMENT OF STAFF

Create recognises that anyone may have the potential to abuse children / vulnerable adults in some way and that all reasonable steps must be taken to ensure unsuitable people are prevented from working with children / vulnerable adults. Pre-selection checks include the following:

- Consent should be obtained from an applicant to seek information from the Disclosure and Barring Service (DBS) including Children's Barred List information, which must be dated within 12 months on appointment, then renewed every three years thereafter;
- Two confidential references, including one regarding previous work with children and / or vulnerable adults; and
- Evidence of identity (passport or photo driving licence).

INTERVIEW AND INDUCTION

All employees will be required to undergo an interview and will receive formal or informal induction, during which:

- Their qualifications should be substantiated;
- The job requirements and responsibilities should be clarified; and
- Child and vulnerable adult protection procedures should be explained and training needs identified.

TRAINING

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff to:

- Analyse their own practice against established good practice and to ensure their practice is likely to protect them from false allegations;
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse;
- Respond to concerns expressed by a child or vulnerable adult; and
- Work safely and effectively with children and vulnerable adults.

Create requires:

- Relevant personnel and trustees to receive training outlining good practice and informing them what to do if they have concerns about the behaviour of an adult towards a child/vulnerable adult;
- Relevant personnel to undertake first aid training (where necessary); and
- Relevant personnel to attend update training at least every three years.

VOLUNTEERS

Create requires that all volunteers are supervised by a member of Create's team at all times, themselves working under the supervision of community partner staff, and are never placed in a position where they are carrying out unsupervised activities with young people under 18 or vulnerable adults.

Where a volunteer is involved in regular or intensive contact* with young people under 18, in line with legal requirements Create will request the volunteer to obtain an enhanced DBS check.

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* 'Regular' is defined as once a week or more frequently; 'intensive' is on four or more days in a month. These terms were defined in amendments to The Safeguarding Vulnerable Groups (SVG) Act 2006 by The Protection of Freedoms Act 2012.

Create contacts
Office hours: 9.30am – 5.30pm

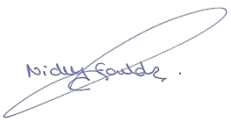
Designated Safeguarding Lead
Kristian Sakulku
Create
3rd Floor, 14 Austin Friars
London EC2N 2HE
T: 020 7374 8485
E: kristian@createarts.org.uk

Deputy Safeguarding Leads
Hannah Clayden
Create
T: 0161 521 0033
E: hannah@createarts.org.uk

Manfred Meyer
Create
T: 020 7374 8485
E: manfred@createarts.org.uk

Chief Executive
Nicky Goulder
Create
3rd Floor, 14 Austin Friars
London EC2N 2HE
T: 020 7374 8485
E: nicky@createarts.org.uk

Board-appointed Safeguarding Trustee
Simone Wright
Create
3rd Floor, 14 Austin Friars
London EC2N 2HE
T: 020 7374 8485



Signed: Nicky Goulder, CEO **Date:** 7 October 2026

Date of next review: 31 July 2027

APPENDIX I

DEFINING CHILD ABUSE

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability.

There are four main types of child abuse: **physical abuse, sexual abuse, emotional abuse** and **neglect.** The abuser may be a family member, or they may be someone the child encounters in residential care or in the community, including during sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

- Physical abuse: where children are physically hurt or injured, including by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating or drowning. This category of abuse can also include when a parent or carer reports non-existent symptoms of illness or deliberately causes ill health in a child they are looking after, as in Munchausen's syndrome by proxy.
- Sexual abuse: when adults (male or female) use children to meet their own sexual needs. This could include, but is not limited to: full sexual intercourse; masturbation; oral sex; anal intercourse; fondling; showing children pornography (books, videos, pictures) or talking to them in a sexually explicit manner.
- Emotional abuse: the persistent emotional ill treatment of a child, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve communicating to a child that they are worthless or unloved, inadequate, or valued only in terms of meeting the needs of another person. It may feature expectations of children that are not appropriate to their age or development. It may involve causing children to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the child very nervous and withdrawn. Ill treatment of children, whatever form it takes, will always feature a degree of emotional abuse.
- Neglect is when adults fail to meet a child's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Refusal to give children love, affection and attention can also be a form of neglect.

ABUSE OF DISABLED CHILDREN AND YOUNG PEOPLE

Some disabled children and young people are mentally or physically more vulnerable than others, which could make it easier for abusers to exploit them. They may also find it more difficult to recognise and report abuse, and to be believed. For example, if their disability means that they:

- Have limited life experiences and so have not developed the social skills needed to work out what the behaviour and attitudes of others mean. This could make them less able to understand what appropriate and inappropriate behaviour is;
- Have been encouraged to comply with other people's wishes and not to question authority figures;
- Are afraid to challenge potentially abusive situations because of fear of the consequences. It is often easier to be compliant and pleasing rather than risk angering an authority figure and getting into trouble;
- May not be able to report abuse either because there is no-one they can report it to or because they do not have the appropriate language to use;
- May not be able to recognise that abuse has taken place;
- Feel powerless because they have to depend on others for personal support;
- May not be able physically to remove themselves from abusive situations;
- Are not believed because their authority figures cannot accept that anyone would abuse a disabled child;
- May not have anybody they can trust and confide in;

- May feel guilt or shame about the abuse which prevents them from reporting it;
- May not have a sense of ownership of their own bodies because they are so used to being examined physically by others as part of their medical and physical care; and/or
- Have low self-esteem and a poor self-image.

In addition to the four main types of abuse shown above, children in residential homes or other institutions might experience:

Institutional abuse - when staff in a home or other institutions sacrifice the needs, wishes and lifestyle of a child in favour of the institution's regime. For example, by showing lack of respect for a child's dignity or privacy, or denying them opportunity to make day-to-day choices or decisions about their life.

Financial abuse - deliberate misuse and exploitation of a child's money or possessions (eg, if the child is not allowed to spend their money as they wish, or if someone takes it from them to spend on themselves).

BULLYING

Bullying, racism and other types of discrimination are forms of child abuse, even though those responsible are often young people. It is important to recognise the impact and extent of bullying and discrimination in the lives of young people. Create has a duty of care to safeguard children from harm, including disabled children and others who may be particularly vulnerable.

What is bullying?

Bullying can be psychological, verbal, or physical in nature. It involves an imbalance of power in which the powerful attack the powerless, and occurs over time rather than being a single act. Examples of bullying behaviour by children include, but are not limited to:

- Being called names, insulted or verbally abused;
- Being deliberately embarrassed and humiliated by other children;
- Being made to feel different or like an outsider;
- Being lied about;
- Being physically assaulted or threatened with violence; and/or
- Being ignored.

In the NSPCC study, Child Maltreatment in the UK, boys were most likely to experience physical bullying or threats, or have property stolen or damaged. Girls were more likely to be ignored or not spoken to.

Bullying by adults was a less common experience but one in ten young people reported this. Their most common experiences of adult bullying were:

- Being deliberately embarrassed or humiliated;
- Being unfairly treated or verbally abused; and/or
- Being ignored or not spoken to.

ABUSE OF VULNERABLE ADULTS

Physical abuse including hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions;

Domestic violence and abuse including controlling, coercive, threatening, violent, or abusive behaviour between people aged 16 or older who are personally connected (including intimate partners, ex-partners, or family members), encompassing psychological, physical, sexual, financial, and emotional abuse;

Sexual abuse including rape and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting;

Psychological abuse including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks;

Financial or material abuse including theft, fraud, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;

Modern slavery including human trafficking, forced labour, debt bondage and being held against one's will;

Discriminatory abuse including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment;

Organisational/institutional abuse including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment;

Neglect and acts of omission including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating;

Self-neglect including extreme neglect of one's own personal hygiene, health, or surroundings, such as severe hoarding or living in unsanitary conditions.

(Care Act 2014, s.42; Department of Health and Social Care, Care and Support Statutory Guidance, Chapter 14: Safeguarding)

APPENDIX II

COMMON SIGNS OF CHILD/VULNERABLE ADULT ABUSE

Every child and vulnerable adult is unique, so behavioural signs of abuse will vary from person to person. In addition, the impact of abuse is likely to be influenced by the child's/vulnerable adult's age, the nature and extent of the abuse, and the help and support the child/vulnerable adult receives. However, there are some behaviours that are commonly seen in children, young people and vulnerable adults who have been abused:

- The child/vulnerable adult appears distrustful of a particular adult, or a parent/carer or a teacher with whom you would expect there to be a close relationship;
- He/she/they have unexplained injuries such as bruising, bites or burns - particularly if these are on a part of the body where you would not expect them;
- He/she/they have an injury which is not explained satisfactorily or properly treated such as ulcers, bed sores or being left in wet clothing;
- Deterioration in his/her/their physical appearance or a rapid weight gain or loss;
- Drowsiness due to too much medication or lack of medication causing recurring crises/hospital admissions;
- Disclosure or partial disclosure (use of phrases such as 'It's a secret');
- Pains, itching, bruising, or bleeding in or near the genital area;
- A change in the child's/vulnerable adult's general behaviour. For example, they may become unusually quiet and withdrawn, or unexpectedly aggressive. Such changes can be sudden or gradual;
- Poor physical condition eg, unkempt, unwashed, inappropriately dressed, poor personal hygiene;
- He/she/they refuse to remove clothing for normal activities or wants to keep covered up in warm weather;
- He/she/they show inappropriate sexual awareness or behaviour for their age;
- Some disabled children may not be able to communicate verbally about abuse that they may be experiencing or have witnessed. It is therefore important to observe these children for signs other than 'telling';
- A vulnerable adult's unexplained or sudden inability to pay bills or sudden withdrawal of money from accounts; and/or
- Extraordinary interest by family members and other people in the vulnerable person's assets.

Remember that the above signs should be seen as a possible indication of abuse and not as a confirmation. Changes in a child's/vulnerable adult's behaviour can be the result of a wide range of factors. Even visible signs such as bruising or other injuries cannot be taken as proof of abuse. For example some disabled children may show extreme changes in behaviour, or be more accident prone, as a result of their impairment. Some ageing processes can cause changes that are hard to distinguish from some aspects of physical assault (for example, skin bruising can easily occur due to blood vessels becoming fragile). However, if you are concerned about a child or vulnerable adult **you have a responsibility to** observe, report and record those concerns.

A child, young person or vulnerable adult may also try to tell you directly about abuse. It is very important to listen carefully and respond sensitively.

TAKING ACTION

Create has clear guidelines about how child and vulnerable adult protection concerns should be dealt with. You should make yourself aware of these guidelines and follow them. Failing to respond to concerns or responding in contravention to Create's guidelines could have serious implications for the future handling of a case.

APPENDIX III

LISTENING TO CHILDREN AND VULNERABLE ADULTS

Artists and project managers are in a position of trust and influence with children, young people and vulnerable adults. You are ideally placed to recognise if a child/vulnerable adult is being abused, whether during creative arts activities, at home, or in the community.

But remember it is **not** your responsibility to decide if a child/vulnerable adult is being abused. Your role is to **observe, report, and record** any concerns you may have.

If a child/vulnerable adult tries to talk to you about something that is worrying them, it is important to listen carefully and respond sensitively:

- If the child/vulnerable adult tells you about abuse they are experiencing, listen carefully to what they tell you.
- Don't ask direct questions. Avoid 'Who?', 'What?', 'When?', 'Where?'.
- Encourage them to talk - 'Do you want to tell me about this?' - but do not pressurise them.
- Keep calm and even if you find what they are saying difficult or painful, keep listening.
- Be honest with them about what you can and cannot do. Tell them you are not able to keep what they have told you secret and that you will try to find them the help they need.
- When they have finished make a detailed note of what they have said, using an incident record form if possible.
- As soon as possible, pass the information to Create's Designated Safeguarding Lead.
- Do not contact or confront the alleged abuser.
- Find someone you trust to talk to about the situation to support you if you feel negatively affected by the what you have heard but remember not to name or identify those involved in the allegations. You can call the NSPCC Child Protection Helpline on 0808 800 5000.
- If you have **serious concerns about the immediate safety** of the child/vulnerable adult contact the Police or Children's Services Department. Record the name of the person you spoke to and tell Create's Designated Safeguarding Lead what you have done.

APPENDIX IV

USE OF IMAGES OF CHILDREN AND VULNERABLE ADULTS

KEY CONCERNS

The key concerns regarding the use of images of children and vulnerable adults relate to:

- The possible identification of children/vulnerable adults when a photograph is accompanied by personal information;
- The inappropriate use, adaptation or copying of images for use on child pornography websites; And/or
- The taking of inappropriate photographs or recorded images of children/vulnerable adults.

RECORDING IMAGES OF CHILDREN/VULNERABLE ADULTS

There have been concerns about the risks posed directly and indirectly to children and vulnerable adults through the use of photographs on websites and other publications. Photographs can be used as a means of identifying children/vulnerable adults when they are accompanied with personal information. This information can make a child vulnerable to an individual who may wish to start to "groom" that child for abuse. Secondly the content of the photo can be used or adapted for inappropriate use. There is evidence of this adapted material finding its way onto child pornography sites.

GUIDELINES FOR RECORDING IMAGES

- All children/vulnerable adults featured in recordings must be appropriately dressed with outer clothing garments covering their torso from at least the bottom of their neck to their thighs (a minimum of vest/shirt and shorts).
- The photograph should ideally focus on the activity. Where possible images of children/vulnerable adults should be recorded in small groups (the group may comprise any combination of adults and children).
- You should ensure that images of those under a court order are not recorded or published.
- Any instances of use of inappropriate images should be reported to the NSPCC Helpline or the Internet Watch Foundation (IWF).
- There is no intention to prevent artists and project managers using video equipment or photographs as part of a creative arts activity. However, participants and their parents/carers should be made aware that this is part of the artistic programme and parental consent should be secured in writing.

GUIDELINES FOR PUBLISHING IMAGES

- If the child/vulnerable adult is named, avoid using the photograph.
- If a photograph is used, avoid naming the child/vulnerable adult or use their first name only. Personal details of children/vulnerable adults such as an email address, home address or telephone number should never be revealed on digital media or in print.
- Make children/adults aware that pictures will be taken and how they will be used through a short discussion.
- Ask for parental/carer permission to use an image of a child or vulnerable adult. This ensures that parents/carers are aware of the way the image of their child is representing Create. A Child/Vulnerable Adult Permission Form is the best way of achieving this and can be done at the beginning of the project/event.
- Think about the level of consideration that you give to the use of images in all publications, for example the processes used in choosing photographs for a publicity brochure. Apply an increased level of consideration for the images of young people/vulnerable adults used in digital media.

- Try to take photographs that represent the broad range of children and vulnerable adults participating in the creative arts activity. This might include:
  - Male and female participants
  - Different ethnic communities
  - A range of clothing
  - Girls with covered hair eg: hat or scarf
  - Disabled people
  - Glasses

GUIDELINES FOR USE OF PHOTOGRAPHIC FILMING EQUIPMENT AT EVENTS

There is evidence that some people have used events as an opportunity to take inappropriate photographs or film footage of young, disabled and vulnerable people. While this might be rare, you still have a duty of care to ensure that this risk is as small as possible. By taking some simple steps you will be reducing that risk.

If you are commissioning professional photographers or inviting the press to an activity or event it is important to ensure that they are clear about Create's expectations of them in relation to child and vulnerable adult protection.

- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Issue the photographer with identification, which must be worn at all times.
- Inform participants and parents/carers that a photographer will be in attendance at an event and ensure that they consent in writing both to the taking and publication of films or photographs.
- Do not allow unsupervised access to children/vulnerable adults or one-to-one photography sessions at events.
- Do not approve/allow photography sessions outside the event or at a child's/vulnerable adult's home.

Parents/carers and other attendees might also wish to take photographs or record their children/adults participating at the activity/event:

- If parents/carers or other attendees are intending to photograph or video at an event they should also be made aware of Create's expectations.
- Parents/carers should be required to register/book for an event if they wish to use photographic equipment.

  In addition:

- Parents/carers should be informed that if they have concerns about inappropriate or intrusive photography these should be reported to Create's project manager and recorded in the same manner as any other child and vulnerable adult protection concern.
- Project managers should approach and challenge any person taking photographs who has not registered. The project manager might need to refer to the local police force if this person continues to record images.

APPENDIX V

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS - REPORT OF CONCERN

Your name:	**Your position:**
Name of Create project at which concern was observed:	**Date and time when concerns were raised or incident occurred:**
Child's/Vulnerable Adult's name:	**Community Partner address** (Partner for the project – eg school or hospital):
Child's/Vulnerable Adult's date of birth (if known):	**Parent's/carer's name and address** (if known):
Brief description of the project and venue:	
Your observations:	
Exactly what the child/vulnerable adult said and what you said: (Remember: do not lead the child/vulnerable adult – record actual details. Make a clear distinction between what is fact, opinion or hearsay. Continue on separate sheet if necessary)	
Action taken so far: (include time and date first reported to Create, who has been made aware)	
External agencies contacted (date & time):	

Police **Yes ☐** **No ☐**	If yes – which: Name and contact number: Details of advice received:
Local authority Children's Services Department **Yes ☐** **No ☐**	If yes – which: Name and contact number: Details of advice received:
Other (eg NSPCC)	Which: Name and contact number: Details of advice received:
Follow up with appropriate agencies; community partner organisation (date and time):	
Signature: **Print name:**	
Date:	

Remember to maintain confidentiality on a *need to know* basis – only if it will protect the child/adult. Do not discuss this incident with anyone other than those who need to know.

This form should be discussed with Create's Designated Safeguarding Lead, Chief Executive or Board Appointed Trustee before being sent to any other party.

APPENDIX VI

MEDIA CONSENT FORM (CHILDREN)

Create will be documenting this project through photographs, videos, voice recordings and/or interviews. I understand that these may be used by Create, stakeholders, media and other third-party organisations/individuals in:

- Printed media (eg reports, printed publications, newspapers, promotional material, **PLUS** any social and online media relating to the original printed media)
- Broadcast media (eg radio interviews, TV interviews, **PLUS** any social and online media relating to the original broadcast media)
- Social/online media (eg e-publications, websites, Bluesky, Facebook, Instagram, LinkedIn, X and YouTube)
- Exhibitions

I understand that any photographs, videos, voice recordings and/or interviews/case studies may be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides. I also understand that the above parties may keep these images or recordings as part of its archive.

YES	NO
☐ **I am happy for my child to be included in photographs, videos, voice recordings, interviews/case studies.**	☐ **I would not like my child to be included in photographs, videos, voice recordings, interviews of the project.**
☐ **I am happy for my child's name to be used.**	☐ **I would not like my child's name to be used.**

Signature: ..... Date:.....

We will collect and hold the personal details given in accordance with Create's privacy policy and the General Data Protection Regulations only for the purposes indicated. We collect media consent which is used to confirm whether we are able to store and use images and videos taken during the any Create event. You can choose to review, amend or delete the information we hold about you or withdraw your permission at any time by emailing info@createarts.org.uk. The information we collect is used exclusively to facilitate our charitable work as disclosed on our website. Any personal statistical data that we collect is anonymised before we use it in any kind of presentation of our work. The full Policy is available on our website www.createarts.org.uk.

APPENDIX VII

MEDIA CONSENT FORM (ADULTS)

Create will be documenting this project through photographs, videos, voice recordings and/or interviews. I understand that these may be used by Create, stakeholders, media and other third-party organisations/individuals in:

- Printed media (eg reports, printed publications, newspapers, promotional material, **PLUS** any social and online media relating to the original printed media)
- Broadcast media (eg radio interviews, TV interviews, **PLUS** any social and online media relating to the original broadcast media)
- Social/online media (eg e-publications, websites, Facebook, Instagram, LinkedIn, Twitter and YouTube)
- Exhibitions

I understand that any photographs, videos, voice recordings and/or interviews/case studies may be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides. I also understand that the above parties may keep these images or recordings as part of its archive.

YES	NO
☐ **I am happy to be included in photographs, videos, voice recordings, interviews/case studies.**	☐ **I would not like to be included in photographs, videos, voice recordings, interviews of the project.**
☐ **I am happy for my name to be used.**	☐ **I would not like my name to be used.**

Signature: ..... Date:.....

We will collect and hold the personal details given in accordance with Create's privacy policy and the General Data Protection Regulations only for the purposes indicated. We collect media consent which is used to confirm whether we are able to store and use images and videos taken during any Create event. You can choose to review, amend or delete the information we hold about you or withdraw your permission at any time by emailing info@createarts.org.uk. The information we collect is used exclusively to facilitate our charitable work as disclosed on our website. Any personal statistical data that we collect is anonymised before we use it in any kind of presentation of our work. The full Policy is available on our website www.createarts.org.uk.