

SAFEGUARDING POLICY

APPROVED DATE	16 March 2026
POLICY REVIEW DATE	16 March 2027
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FREQUENCY OF POLICY REVIEW	1 year

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1. Definitions

“Workforce” - All Complicité staff, freelancers, chaperones, associates, volunteers, contractors, contracted organisations, trustees, project leaders.

“Staff” - Anyone that is directly employed by Complicité, is a project leader, or who has been contracted by Complicité as a freelance individual or organisation to work with children, young people and/or adults at risk on projects delivered by Complicité. These people have regular and ongoing contact with children/young/vulnerable people.

“Volunteer” – A volunteer is someone who works for an organisation without being paid. Complicité very rarely, if ever, works with volunteers for our work with children, young people and/or adults at risk. They would be supervised throughout the course of their time working with children, young people and/or adults at risk.

“Visitor” – Visitors are individuals who attend a session at Complicité either as a guest, or as an observer. Visitors may come into contact with children, young people and/or adults at risk but are always supervised throughout the course of their visit, and are never given any responsibility for working with children, young people and/or adults at risk.

“Child/young person” - A person under the age of 18 years.

“Adult at risk” - A person over the age of 18 who has care or support needs and is experiencing (or is at risk of experiencing) abuse, neglect and/or exploitation, and who is unable to protect themselves because of those needs.

“Abuse, neglect and/or exploitation” - Abuse, neglect and/or exploitation is the violation of an individual’s human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act. In all forms of abuse, neglect and/or exploitation there are elements of emotional abuse. Adults at risk may also suffer additional types of abuse such as being manipulated financially or being discriminated against. Other examples of abuse include inflicting physical harm such as hitting or misuse of medication, rape and sexual assault or exposure to sexual acts without informed consent, emotional abuse such as threats, humiliation and harassment, exploitation, ignoring medical or physical needs, withholding of necessities of life such as food or heating, witnessing domestic violence. Bullying

is also a form of abuse by peers or a person more powerful than the victim. This list is **not** definitive.

“Physical Abuse” - This is abuse that causes physical harm to a child, young person and/or adult at risk as well as fabrication of symptoms of or deliberately causing ill health to a young person or adult at risk.

“Emotional Abuse” - Emotional abuse is an element of all forms of abuse, neglect and/or exploitation. It is abuse that causes adverse effects on the young person’s or the adult at risk’s emotional development, particularly from emotional ill-treatment of a young person or adult at risk.

“Sexual Abuse or exploitation” - Involves forcing or enticing a child, young person or adult at risk to take part in or witness sexual activities, whether or not the young person or adult at risk is aware of what is happening.

“Financial Abuse” – Is the mistreatment of someone in terms of their money or assets, putting a young person or adult at risk under pressure regarding their money.

“Domestic Abuse” – Can be psychological, physical, sexual, financial or emotional. Can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

“Neglect” – Neglect can occur when children, young people or adults at risk do not have, for example, adequate food, health care or education. They could suffer neglect when: any of their basic needs are not being met; they are left unsupervised in situations which represent possible dangers; they are left alone when it is inappropriate for their physical or emotional development.

“Exploitation” – child exploitation is when someone uses a child for financial gain, sexual gratification, labour or personal advantage.

See **Appendix 1** for a more detailed description of how to recognise abuse, neglect and/or exploitation or refer to ‘What to do if you are worried a child is being abused’ (2015 HM Government).

2.Introduction

Complicité has a moral and legal obligation to ensure that, when given responsibility for children, young people and adults at risk, the workforce accept their responsibilities to safeguard children, young people and adults at risk from harm, abuse, neglect and/or exploitation. This means ensuring that everyone follows procedures to protect children, young people and adults at risk and reporting any concerns about their welfare to appropriate authorities.

The aim of this policy is to promote good practice, providing children, young people and adults at risk with appropriate safety/protection while in the care of Complicité and to allow the workforce to make informed and confident responses to specific child protection and wellbeing issues.

We expect that all workforce and anyone else who comes into contact with children and adults at risk behave in an appropriate manner at all times, and remember that the welfare of the child, young person or adult at risk is paramount.

3. Child Protection and Safeguarding Policy Statement

The purpose of this policy is:

- To protect children, young people and adults at risk who receive Complicité services from harm
- To provide all workforce with the overarching principles that guide our approach to safeguarding and child protection

This policy applies to all workforce, including senior management, board of trustees, paid staff, freelancers, associates, volunteers, chaperones, contractors, project leads, and anyone working and/or volunteering on behalf of Complicité.

4. Legal Frameworks

This policy has been drawn up on the basis of law and guidance that seeks to protect children, young people and adult at risks, including:

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children (statutory guidance, Dec 2023)
- Care Act 2014 (and Care and Support Statutory Guidance)
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 (DBS/barring framework)

- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance (in force from 31 Dec 2023)
- UK GDPR and Data Protection Act 2018
- Online Safety Act 2023 (context for online harms and safeguarding)
- Children (Performances and Activities) (England) Regulations 2014 (child performance licensing/chaperones)

We recognise that:

- The welfare of the child/young person/adult at risk is paramount: with regard to children and young people this is enshrined in the Children Act 1989
- All children and adults at risk, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm, abuse, neglect and/or exploitation
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting children and young people's welfare
- Working in partnership with their carers and relevant agencies is essential in promoting adults at risk's welfare

We seek to keep children, young people and adults at risk safe by:

- Valuing, listening to and respecting them
- Adopting child protection and safeguarding practices through clear procedures and a code of conduct (section 6) for all workforce
- Developing and implementing an effective internet safety policy and related procedures (this can be found at section 14 in this document)
- Providing training relating to Child Protection and Safeguarding for appropriate members of staff and providing effective management through supervision and support
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, staff and volunteers to a level that is appropriate to the circumstances of their engagement with us
- Using our procedures to share concerns with agencies who need to know and involving parents, children and adults at risk appropriately
- Appointing a designated safeguarding lead (DSL), and a designated deputy safeguarding lead (DDSL)

This mandatory policy is approved and endorsed by the Complicité Board of Trustees.

The implementation of procedures will be regularly monitored and reviewed by the DSL, with support from the DDSL and the Board member responsible for Safeguarding.

This policy will be reviewed annually.

5. People responsible for safeguarding

The Designated Safeguarding Lead for Child Protection and Safeguarding (**DSL**) at Complicité is **Natalie Raaum**, Creative Engagement Producer and is contactable on 0207 485 7700 / natalie@complicity.org / 07895 783 559 (out of hours).

The Designated Deputy Safeguarding Lead for Child Protection and Safeguarding (**DDSL**) is **Rima Dodd**, Project Producer, and is contactable on 0207 485 7700 / rima@complicity.org / 07956 094 269 (out of hours).

The DSL should be the first point of contact, but if they can't be reached you should contact the DDSL immediately after.

The DSL and DDSL will have regular training (every two years) to keep up to date with policy and advice on Child Protection and Safeguarding issues.

It is the responsibility of the DSL:

- To receive, record and assess promptly and carefully information from anyone who has concerns
- to support and advise the workforce about policy and procedures in relation to child and adult at risk protection and safeguarding
- to liaise with the relevant authorities on matters arising from child and adult at risk protection and safeguarding

All the workforce have a responsibility to uphold this policy and to inform the DSL (or DDSL) of any concerns. This policy will be made available to all workforce working at Complicité during their induction period and revised copies circulated when they are produced.

6. Code of Conduct

All workforce who work with Complicité will be expected to demonstrate exemplary behaviour and uphold good practice when working with children, young people, and/or adults at risk, observing the following principles:

- Treat all children, young people, and/or adults at risk equally, as individuals and with respect
- Set an example you would wish others to follow
- Use appropriate language (physical and verbal)
- Give enthusiastic and constructive feedback, rather than negative criticism
- Respect a child/young person/adult at risk's personal space and right to personal privacy
- Be inclusive and aware of limitations, i.e. due to a medical condition
- Ensure proper supervision – plan activities that involve more than one person being present and ensure that in a situation where a facilitator is left alone with a group, that it should be in sight/hearing of others and easily accessible (i.e. leave doors open)
- Observe appropriate dress and behaviour
- Allow children, young people and adults at risk to talk about any concerns they may have; take these concerns seriously
- If you are at all concerned about a young person or adult at risk, or a disclosure is made, then follow disclosure procedures immediately following the conversation

Staff, volunteers, freelancers and trustees will NEVER:

- Give a child, young person or adult at risk a lift in their car
- Leave a group for which they are responsible unattended
- Engage in inappropriate behaviour or contact – physical, verbal, sexual
- Initiate contact with a child, young person or adult at risk outside of Complicité projects unless previously agreed with project leaders and parents. If a young person or adult at risk initiates contact with you, you must immediately inform a staff member
- Share personal contact details (personal telephone number, address or email address)
- Add, follow or friend young people on social media
- Use or allow rough, physical, sexually provocative or offensive behaviour or language
- Let allegations, suspicions or concerns about abuse, neglect and/or exploitation go unreported

7. How to deal with a disclosure (the 5 R's)

Complicité staff are aware that they may potentially be in a position of hearing a disclosure. How you respond to that disclosure is very important. The following is some guidance on dealing with disclosures:

RECEIVE: Listen to what is being said. Accept what is said and react calmly.

Try not to interrupt or ask a lot of questions and let them tell you at their own pace.

Silences are ok, don't rush to fill the gap.

REASSURE: Tell them they are not to blame and that it was right to tell someone.

Reassure them as far as is honest and reliable, let them know you believe them and acknowledge their trust, courage and strength in telling you.

Do **not** promise to 'keep it a secret'; let them know that you may have to tell others but only those who need to know and they should be able to help.

REACT: Don't interrogate for full details or ask leading questions (e.g. 'What did they do next?')
Listen, don't pry.

Don't panic or show that you are shocked and don't make promises you can't keep.

Use the child or adult at risk's own vocabulary.

Explain what you have to do next and who you have to talk to.

RECORD: Make brief notes at the time if you can, otherwise write it down as soon as you can afterwards.

The following information is useful to record:

- Date, time and place the disclosure is made
- People present when the disclosure is made
- Any noticeable non-verbal behaviour
- Name/Age/Contact Details of child, young person or adult at risk
- Nature of the allegation
- The child or adult at risk's account or details of what has prompted the concerns
- Any other relevant dates or times
- People involved
- A clear distinction about what is fact, opinion or hearsay, and whether these are your own concerns or someone else's

REMEMBER: to share your concerns with the Designated Safeguarding Lead (DSL), or Designated Deputy Safeguarding Lead (DDSL) as soon as possible as per the process detailed below and via the form in **Appendix 2**.

Do **not** share the information outside of the organisation.

8.Reporting Procedure

All disclosures must be reported to the DSL as soon as possible, or the DDSL if the DSL is unavailable. This should be done either in person or via phone in the first instance, and followed up in written form using our official reporting form.

Most of Complicité's work with children, young people and adults at risk takes place at other venues or in schools. Please be aware that if the disclosure takes place in a school or property away from the Complicité office, that organisation will follow their own procedure of Child or Adult

at Risk Protection, including informing the child's primary carer, but we must still follow our own procedures as stated in this policy.

If a child, young person and/or adult at risk is believed to be in immediate danger staff should call **999**.

9. Referrals

On receiving a disclosure that is reported and recorded in the report form, the DSL or DDSL will then contact the relevant authorities about the disclosure where appropriate.

In the case of a referral, the DSL or DDSL will contact:

Multi-Agency Support Team (MAST):

https://www.towerhamlets.gov.uk/lgnl/health_social_care/children_and_family_care/Multi-Agency-Support-Team-MAST.aspx

Tel: 020 7364 5006, Option 2 or 3

For urgent concerns outside of office hours, call their Emergency Duty Team at 020 7364 4079 (after 5pm and at weekends)

Email: MAST@towerhamlets.gov.uk (9am to 5pm, Monday to Friday)

Emergency duty team (Tower Hamlets)

Tel: 020 7364 5606 (after 5pm on weekdays and any time on weekends or bank holidays).

Tower Hamlets Connect

Tel: 0300 303 6070 (weekdays 9am to 5pm) out of hours 020 7364 4079. **Email:**

enquiry@towerhamletsconnect.org

Where the allegation is against a member of staff, this should go directly to:

Tower Hamlets Local Authority Designated Officer (LADO)

Tel: 020 73640677

Email: LADO@towerhamlets.gov.uk

Support from the **NSPCC** Helpline in the case of concerns about a child's wellbeing:

NSPCC stands for National Society for the Prevention of Cruelty to Children. It is the UK's leading children's charity, preventing abuse and helping those affected to recover. The NSPCC Helpline

offers vital support. Whatever the concern, the NSPCC are there 24 hours a day to offer help and advice.

The Helpline on **0808 800 5000** is free to call from landlines and from most mobile networks. Their trained helpline advisors can discuss anything you need to about a child, you don't have to say who you are and can talk to them in confidence in almost all situations. However, if you do tell them something that leads them to believe a child is in immediate danger, they have a duty to pass details on.

10. Allegations against a member of staff

In the event of allegations made against an employee of Complicité, the protection of the child/young person/adult at risk is of first and paramount consideration. Complicité has a responsibility to both the child/young person/adult at risk and the employee but ensures that the first priority is to ensure that the child/young person/adult at risk is exposed to no further risk.

Complicité will ensure that the same person will not have responsibility for dealing with the child/young person/adult at risk's welfare issues and the member of staff.

Any allegations will be taken seriously and assessed promptly and carefully following the reporting and referral procedures detailed.

The subject of the allegation must not be informed or contacted about the allegation until advice has been sought from the Local Authority Designated Officer (LADO), children's social care and/or the police.

Complicité will maintain a close liaison with the relevant authorities, including contacting the Local Authority Designated Officer (LADO) to agree further action to be taken.

In the event of allegations against Complicité's DSL or DDSL, this should be reported to the Board of Trustees. The Designated Safeguarding Lead on the board is Frances Hughes. Frances is contactable on 07786 111 401 / F.Hughes@hfclaw.com

11. Concerns outside direct Child Protection and the Protection of Adults at risk

Preventing Radicalisation / Extremism

The Counter-Terrorism and Security Act 2015, which received Royal Assent on 12 February 2015, places a statutory duty on specified authorities, including local authorities, education providers, childcare providers, and other children's services, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

This duty requires these authorities to address the risks of radicalisation within the scope of their existing functions, as outlined in the Prevent Duty Guidance (most recently updated in 2023). The Prevent duty emphasises a collaborative approach, ensuring compliance with other legal obligations, such as data protection and the Equality Act 2010.

What is radicalisation / extremism?

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It is in itself a form of harm.

Extremism was defined by the Home Office in 2011 as a vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs (HM Government, 2011).

In 2024, the Department for Levelling Up, Housing and Communities published a new definition of extremism for England (DLHC, 2024).

Extremism is defined as the support or promotion of an ideology based on violence, hatred or intolerance that aims to:

- deny or destroy the fundamental rights and freedoms of others
- undermine or overturn the UK's system of democracy and democratic rights
- intentionally create an environment that permits or enables others to achieve either of the above
- The new definition also set out types of behaviour which could constitute extremism, including:
 - using or excusing violence towards a group of people to stop them from using their legally defined rights and freedoms
 - seeking to overthrow or change the political system outside of lawful means
 - using or excusing violence towards public officials, including British armed forces and police forces, to stop them carrying out their duties
 - attempting to radicalise and recruit others, including young people, to an extremist ideology

Challenging and tackling extremism needs to be a shared effort (HM Government, 2013).

Most extremist materials and activities do not meet a terrorism threshold. All organisations that work with children, young people and adults at risk have a responsibility to protect those from being harmed by radicalisation and exposure to extremist views.

How does radicalisation happen?

The process of radicalisation may involve:

- being [groomed](#) online or in person
- exploitation, including [sexual exploitation](#)
- psychological manipulation
- exposure to violent material and other inappropriate information
- the risk of physical harm or death through extremist acts

It happens gradually so children, young people and/or adults at risk who are affected may not realise what it is that they are being drawn into, and then may be threatened if they then try to leave an extremist group..

Vulnerability factors

Anyone can be radicalised but there are some factors which may make a person more vulnerable. These include:

- being easily influenced or impressionable
- having low self-esteem or being isolated
- feeling that rejection, discrimination or injustice is taking place in society
- experiencing community tension amongst different groups
- being disrespectful or angry towards family and peers
- having a strong need for acceptance or belonging
- experiencing grief such as the loss of a loved one

These factors will not always lead to radicalisation.

Indicators of radicalisation

If a child, young person or adult at risk is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause.

For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance
- lose interest in friends and activities that are not associated with the extremist ideology, group or cause
- have material or symbols associated with an extreme cause

- try to recruit others to join the cause (Home Office, 2020)

What to do if you think a child, young person or adult at risk is being radicalised

If you think a child, young person, adult at risk, or the people around them are involved in radicalisation and there is an immediate risk of harm, call 999 straight away.

If it isn't an emergency:

- contact the DSL/DDSL
- contact ACT (Action Counter Terrorism) Early Support Line on 0800 011 3764
<https://actearly.uk/>
- call the police anti-terrorism hotline on 0800 789 321
- call the NSPCC [radicalisation helpline](#)

Training

Complicité workforce who work directly with children, young people and/or adults at risk should be trained to understand how people can become radicalised, recognise the signs that someone may be at risk and know what action to take.

Positive messages

Complicité staff can build vulnerable people's resilience to radicalisation and extremism by:

- helping improve their self-esteem and self-confidence
- promoting inclusivity and community cohesion
- helping people understand how they can influence and participate in decision making.

What are Complicité's responsibilities under the Prevent duty?

The Department for Education (DfE) has guidance on [how to report any concerns about a child or young person in England who may be vulnerable to radicalisation \(DfE, 2022b\)](#).

Where Complicité delivers work in schools or other education settings, we follow the host organisation's Prevent procedures and reporting routes, in addition to Complicité's internal safeguarding and reporting procedures.

Female Genital Mutilation (FGM)

What is FGM?

Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.

FGM is often performed by someone with no medical training who uses instruments such as a knife, scalpel, scissors, glass or razor blade. Children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained.

The age at which FGM is carried out varies. It may take place:

- when a female baby is newborn
- during childhood or adolescence
- just before marriage
- during pregnancy

FGM is child abuse and is **illegal** in the UK.

Risks and vulnerability factors

- FGM can happen in the UK or abroad.
The DfE, DHSC and Home Office have identified higher rates of FGM in certain countries, which may put children from these communities at higher risk. A list of these countries is provided in the [multi-agency statutory guidance on female genital mutilation](#) (DfE, DHSC and Home Office, 2020)
- Children are also considered to be at higher risk if FGM has already been carried out on their mother, sister or a member of their extended family (DfE, DHSC and Home Office, 2020)

Signs and indicators

A child at immediate risk of FGM may ask you directly for help. But even if they don't know what's going to happen, there may be other signs. You may become aware of:

- a relative or 'cutter' visiting from abroad
- a special occasion or ceremony to 'become a woman' or prepare for marriage
- a female relative being cut; a sister, cousin, or an older female relative such as a Mother or Aunt
- a family arranging a long holiday or visit to family overseas during the summer holidays

- unexpected, repeated or prolonged absence from school
- a girl struggling to keep up in school and the quality of her academic work declining
- a child running away from or planning to leave home

A child or woman who's had female genital mutilation (FGM) may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- display unusual behaviour after an absence from school or college
- be particularly reluctant to have routine medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

Reporting

FGM is child abuse and is illegal in the UK.

Complicité takes all concerns about FGM extremely seriously. Any suspicion, disclosure or indication that a child may be at risk of FGM, or that FGM may have taken place, must be acted on promptly.

Mandatory reporting applies to regulated professionals only

The FGM mandatory reporting duty applies to regulated professionals (for example, teachers, health professionals and social workers) in the course of their professional work.

If you are a **regulated** professional and you know (through disclosure from the child or visual identification) that FGM has been carried out on a girl under 18, you have a legal duty to make a report to the police in line with the mandatory reporting requirements. You should also inform Complicité's DSL/DDSL as soon as possible (and follow the host organisation's safeguarding procedures where relevant).

If you are a member of Complicité's workforce (including staff, freelancers, associates, contractors and trustees) and you suspect a child may be at risk of FGM or if you suspect that FGM has already occurred, please seek help and advice, even if the FGM didn't happen recently.

- Contact the DSL or DDSL
- Record the concern using the safeguarding reporting form
- Contact the FGM helpline on 0800 028 3550 or by emailing fgmhelp@nspcc.org.uk
- Contact the police

If you believe a child is in immediate danger, call 999.

Preventing FGM

People who work with children can help prevent FGM by:

- challenging beliefs about FGM
- educating communities about FGM
- reporting any concerns

Honour Based Violence / Honour Based Abuse

HBA (Honour-based abuse): A term that encompasses the full range of abuse that can occur when family members or friends believe a victim has brought shame to the family or community. HBA can include physical, emotional, and practical abuse.

HBV (Honour-based violence): A term that refers to specific acts of violence committed in the name of "honour", such as physical attacks or "honour" killings.

Honour-based abuse (or HBV) is a crime or incident committed to protect or defend the so-called 'honour' of a family or community. People who carry out honour-based abuse are often close family members of the victim(s) but also extended family or community members.

Types of honour-based abuse

There isn't one specific crime of honour-based abuse. It can involve a range of crimes and behaviours, such as:

- forced marriage
- domestic abuse (physical, sexual, psychological, emotional or financial)
- sexual harassment and sexual violence (rape and sexual assault or the threat of)
- threats to kill, physical and emotional violence and murder
- pressure to go or move abroad
- being kept at home with no freedom
- not allowed to use the telephone, internet, or have access to important documents like their passport or birth certificate
- isolation from friends and members of their own family

Warning signs

If you're concerned about someone being abused, here are some warning signs to look out for:

- acting withdrawn or upset

- bruising or other unexplained physical injury
- depression, self-harming or attempted suicide
- unexplained absence or poor performance at school or work
- their movements at home are strictly controlled
- family rows, domestic violence
- running away from home
- a family history of relatives going missing

So-called reasons for HBV/HBA

If a family or a community think a child, young person or adult has shamed or embarrassed them by behaving in a certain way, they may punish them for breaking their 'honour' code. Some of the so-called reasons (remember thought, there is never an excuse for HBV/HBA) are:

- having a relationship or marrying someone outside their community or someone within their community that their family don't approve of
- separate or divorce
- talk to certain people
- have sex before marriage
- become pregnant or give birth outside of marriage
- wear clothes their family or community think are inappropriate
- use drugs or alcohol
- access higher education
- challenge what their family or community expect of them
- disagree with the religion of their family or community

AI (Artificial Intelligence)

Complicité recognises that Artificial Intelligence (AI), including generative AI, is increasingly present in digital platforms, creative tools and online services that may be encountered by children, young people and adults at risk.

Generative AI refers to tools that can create new content such as text, images, audio or video, or simulate conversation (for example, chatbots). While these technologies can support creativity and learning, they also present safeguarding, wellbeing and equality risks.

Potential AI-related safeguarding concerns

These may include, but are not limited to:

- Exposure to harmful, sexual, violent, discriminatory or distressing AI-generated content
- AI being used to support bullying, harassment, grooming, coercion or exploitation

- The creation, possession, sharing or threat of sexual images of children (including AI-generated or manipulated images), which is illegal
- Threats, blackmail or “sextortion” involving AI-generated or altered images, audio or messages
- AI tools providing misleading, unsafe or inappropriate information or advice, particularly where a child, young person or adult at risk is distressed or vulnerable
- Over-reliance on AI chatbots for emotional support instead of trusted adults or professional help
- Misuse of images, audio, video or personal data without consent, or lack of transparency about how AI tools store or use data

Complicité’s approach to AI-related concerns

Where AI tools are encountered or used in the context of Complicité’s work:

- AI must never replace professional judgement, safeguarding responsibilities or human oversight
- AI must not be used to assess risk, respond to disclosures, or make safeguarding decisions
- Any concerns involving the creation, possession, sharing or threat of sexual images of children (including AI-generated material) must be treated as a serious safeguarding concern and escalated immediately
- The workforce should remain alert to signs that a child, young person or adult at risk may be experiencing harm linked to AI use, including bullying, intimidation, manipulation, exploitation or emotional distress

What to do if you have an AI-related concern

If a member of the workforce becomes aware of an AI-related concern:

- If there is immediate risk of harm, call 999.
- Report the concern to the DSL (or DDSL if unavailable) as soon as possible, following Complicité’s reporting procedures (Sections 7–9).
- Record the concern using the Reporting Form (Appendix 2), including the platform or tool involved and the nature of the concern.
- The DSL/DDSL will assess the concern and determine whether further action or referral is required.

Complicité recognises that AI technologies are rapidly evolving and will keep this area under review, updating guidance and practice as needed to support safeguarding and wellbeing.

12. Confidentiality

Complicité is committed to ensuring people's rights to confidentiality.

- The DSL and/or DDSL will only disclose information about a logged concern to other members of staff on a need to know basis and all information will be stored securely
- Giving such information to others for the protection of a child, young person or adult at risk is not a breach of confidentiality – staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children, young people and/or adults at risk
- We cannot guarantee total confidentiality where the best interests of a child, young person or adult at risk are at risk to disclose information to other parties
- Primary carers, children, young people and adults at risk have a right to know if personal information is being shared and/or a report is being made to relevant authorities, unless doing so could put them at further risk

13. Communicating with Children, Young People and Adults at risk

Complicité's official policy is to maintain all direct communication with young people via their parents, guardians or (in a formal setting) through their teacher or responsible person.

Via telephone

If it is necessary to contact a child, young person or adult at risk via telephone, this will always be done via the company phone and where possible in an open office where the conversation can be witnessed.

Via email

Staff will, on occasion, be required to email children, young people and adults at risk. This should only ever be done by a permanent staff member. In all cases, staff should use formal language to avoid any misunderstanding on the part of the recipient and should carbon copy the DSL and /or the DDSL, as well as the parent/carer and/or school contact, and keep communication visible/auditable via organisational accounts. The email address of the child, young person or adult at risk must be blind carbon copied (bcc).

Social Media

Complicité recognises that social media can be a legitimate and effective way to communicate with children and young people and adults at risk; such contact through these forums must only take place through the organisational accounts and never through personal accounts.

If a child, young person or adult at risk initiates inappropriate contact via email, text, phone or social media, Complicité staff must inform them that it is inappropriate and then inform the DSL and/or DDSL. Contact should be avoided via a staff member's personal telephone but if this is unavoidable, inform the DSL/DDSL immediately.

14. Remote working with Children and Young People and Adults at risk

Complicite staff often work remotely. When working with young people and/or adults at risk digitally then the following guidelines will apply for all workers to keep themselves and the young people they work with safe.

Working remotely

When working remotely staff will have their own accounts to access emails and a log-in to access files. All files are saved on Google Shared Drive.

- No young people's or adults at risk' details or images will be saved on staff computers
- If young people's or adults' at risk' images need to be downloaded for photo or video editing they will be deleted once the edit has taken place
- Staff will always lock their computer or close documents with sensitive information when they are away from their computers

Communication

The Guidelines for communicating with children, young people and adults at risk stays the same as outlined in paragraph 13, Communicating with Children and Young People and Adults at risk.

When using live video chat with young people or adults at risk:

- No group of children, young people or adults at risk should be left unsupervised on a video call - there should always be two members of staff (or a teacher) present, of which one needs to be DBS checked
- There should be no 1 to 1 video calls with a child, young person or adult at risk
- Never show things that might reveal your exact location
- You must dress appropriately
- Only record or photograph the chat if explicit consent has been given by parents/carers in advance
- Some digital platforms include AI-enabled features such as automated captions, transcription, recording or chat functions. Staff and/or freelancers must ensure that any AI features used during remote delivery do not compromise safeguarding, privacy or consent
- AI-enabled recording, transcription or analysis tools must not be used with children, young people or adults at risk unless this has been explicitly risk-assessed, consented to in advance, and approved in line with Complicité's safeguarding, confidentiality and data protection requirements
- Any AI-related concerns arising from remote work must be reported to the DSL/DDSL in line with Section 11 and the reporting procedures in Sections 7–9

Receiving a disclosure via email or phone

We recognise that there is opportunity for children, young people or adults at risk to disclose information to staff members digitally.

- If a member of the workforce receives a worrying message that they think may indicate that the child, young person or adult at risk in communication with them is at immediate risk during or outside of work hours, they should immediately refer it for action to Complicité's DSL and/or DDSL. This information should be passed on by speaking on the phone as soon as possible and an incident report on the situation should be completed within 24hrs and sent to the DSL or DDSL
- If the project is in partnership with a school, Complicité's DSL will in turn report anything immediately to the DSL at that school. If there is no response from the school the Complicité DSL should alert the emergency services (in most cases this will be the police) by calling 999 and giving as much information as possible
- If the child, young person or adult at risk is not in immediate risk the staff member should follow Complicité's normal reporting procedure (see section 8)

15. Trips and Offsite Visits

- Consent will be obtained by parents and/or carers before any trip involving children, young people or adults at risk away from the Complicité office or the agreed delivery site of a project
- A member of staff who holds a current First Aid Certificate will accompany the trip, and a First Aid kit plus any medication needed for any individuals will be taken with them. If working with a school, the school is responsible for all First Aid.
- Collection and return arrangements will be agreed in advance with parents and/or carers, specifically permission for young people or adults at risk to make their way to/from the project site independently

16. Photography and Video

Images or video recording of a child/young person will not be used for any reason without the written consent of the parent or guardian and the young person themselves.

Photographs or videos of children and young people will be stored on Complicité's secure network.

Any camera used by staff for the purpose of filming or photographing children or young people engaged in a Complicité activity must have its memory wiped as soon as content has been transferred to the secure system.

Images or video recording of an adult at risk will not be used for any reason without the written consent of the individual.

Complicité staff will ensure that the adult at risk understands what is being asked of them and that they have the right to refuse consent.

- We will not use children's or adults at risk' full names in photograph or video captions
- We will provide written expectations for professional photographers, videographers or press who are invited to events
- Photographers and/or videographers will be supervised at all times when working with children, young people and adults at risk
- Parents/carers have the right to ask for the removal of photographs or videos involving their child at any time
- Children and adults at risk also have the right to ask for the removal of photographs or videos involving themselves at any time
- Images, audio or video of children, young people or adults at risk must not be used to create AI-generated or AI-altered content (including enhancement, stylisation, voice cloning or synthetic media) without clear, informed written consent and an appropriate safeguarding risk assessment
- Any concerns relating to AI-generated or manipulated content (including potential misuse, impersonation, sexual exploitation material or non-consensual use) must be treated as a

safeguarding concern and reported immediately to the DSL/DDSL, in line with Section 11 and the reporting procedures in Sections 7–9

We, Complicity, cannot guarantee that cameras/video cameras will not be used at public events, sharings or for education programmes.

17. Professional Production Contexts and Child Employment

The key information with regards to child performers is available here:

<https://www.gov.uk/child-employment>

A child may need a licence if they're under school leaving age and taking part in:

- films, plays, concerts or other public performances that the audience pays to see, or that take place on licensed premises
- any sporting events or modelling assignments where the child is paid

In this instance, Complicité must apply to the child's local council for a child performance licence.

Supervision for the child

If the child won't be with their parent, carer, school teacher or home tutor, they will be supervised by an approved chaperone.

- A chaperone's priority is always to the child
- A chaperone is able to negotiate with the production company and say no when what they are asking the child to do is contrary or detrimental to the child's health, wellbeing or education
- A chaperone may supervise up to 12 children subject to licence conditions and the child's needs/risk assessment.

Complicité acknowledges that the normal rules for paying children and restrictions on employment apply to children in performances.

18. Raising a Concern

A concern may be raised about any risk, malpractice or wrongdoing that an employee thinks is harming the service Complicité delivers, regardless of whether it impacts them directly. The process for Raising a Concern is outlined in Complicité's 'Dignity at Work' Policy, which is available at www.complicity.org

Low-level concerns

Complicité encourages all workforce to share concerns about behaviour that may be inappropriate, concerning, or fall below expected standards, even if it does not meet the threshold of a safeguarding allegation.

These "low-level concerns" may include boundary issues, poor judgement or conduct that could pose a safeguarding risk if not addressed. All low-level concerns should be reported to the DSL (or DDSL) and will be recorded and managed proportionately, with the aim of early intervention, support and maintaining a safe culture.

Raising a safeguarding concern (children, young people and parents/carers)

Complicité is committed to ensuring that children, young people, adults at risk and their parents or carers feel safe, listened to and supported if they have a safeguarding concern.

Anyone who is worried about the safety or wellbeing of a child, young person or adult at risk involved in Complicité's work is encouraged to speak up. Concerns can be raised directly with Complicité's Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) using the contact details listed in this policy. All concerns will be taken seriously, handled sensitively and responded to appropriately.

Children and young people may also choose to seek confidential advice and support outside the organisation. They can contact:

- **Childline** on **0800 1111** (free, 24 hours a day), or via www.childline.org.uk

Parents, carers and adults who are concerned about a child's wellbeing can also contact:

- **NSPCC Helpline** on **0808 800 5000**, or via www.nspcc.org.uk

Seeking advice or raising a concern will never get someone into trouble. Complicité will always prioritise the safety and wellbeing of children, young people and adults at risk.

19. Safer Recruitment

Job or role descriptions for all roles involving contact with children, young people or adults at risk will contain reference to safeguarding responsibilities.

DBS checks will be conducted for specific roles for staff, freelancers, volunteers, chaperones working with children, young people or adults at risk; Complicité will review the roles to which this applies regularly.

There will be checks in place to ensure the safeguarding arrangements of partner organisations.

All staff will read this Safeguarding Policy and new staff will receive relevant induction and training.

Our policy will be made available to organisations and schools we work with.

20. Complaints

Complaints about this policy, these procedures or their implementation should be dealt with according to Complicité's Complaints Policy, available on our website.

APPENDIX 1

Recognising signs of abuse, neglect and/or exploitation

The following signs may or may not be indicators that abuse, neglect and/or exploitation has taken place, but the possibility should be considered.

Signs of possible physical abuse

- Any allegation made by a child or adult at risk concerning physical abuse
- Any injuries not consistent with the explanation given for them
- Injuries which have not received medical attention
- Frozen watchfulness (a state in which a child or adult at risk is unresponsive to their surroundings but clearly aware of them)
- Bite marks
- Burns or scalds (including deep contact burns such as cigarette burns)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts

Signs of possible sexual abuse

- Any allegation made by a child or adult at risk concerning sexual abuse
- Sudden changes in behaviour
- Preoccupation with sexual matters and inappropriate knowledge of adult behaviour for their age
- Self-harm
- Alluding to secrets they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour e.g. thumb sucking
- Distrust of familiar adults e.g. anxiety of being left with relatives
- Unexplained gifts or money
- Severe sleep disturbances

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour
- Sudden underachievement or lack of concentration
- Sleep or speech disorders
- Over reaction to mistakes
- Lack of self-confidence or esteem

Signs of possible financial abuse

- A change in living conditions
- Selling possessions

- Being unable to pay bills, or an unexpected lack of money
- Money being taken out of an account without a reason
- Financial documents being lost without a reason
- Someone being cut off from family, friends or their social network
- The carer having more money to spend on things like clothes, travel and accommodation
- Sudden changes to a bank account or how someone uses it
- New, recent authorised signers on the adult at risk's account card
- Money being taken without permission from the adult at risk's ATM card
- Changes in how the ATM card is being used (such as more frequently or from different locations)
- Sudden or unexpected changes to someone's will or other financial documents

Signs of possible neglect

- Constant hunger
- Poor personal hygiene
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Untreated medical problems

Factors which have been shown to increase the chance of abuse, neglect and/or exploitation for an adult include:

- A person being over 75 and female
- Organic brain injury (lower mental function due to illness)
- Cognitive impairment (someone having trouble with memory, thinking skills or making decisions)
- Physical, mental or emotional dysfunction, especially depression, recently losing a partner, not having friends or social network, living alone, or not having contact with their children

APPENDIX 2

Reporting Form for logging a concern about a child, young person or adult at risk

Date and time of writing:

Name of child/young person/adult at risk:

Age and Date of Birth:

Ethnicity:

Religion:

First Language:

Disability:

Any special factors:

Parent/Carer's Name:

Home Address:

Phone Number (if available):

Are you reporting your own concerns or those of somebody else? Give details.

What has prompted the concerns? What are you worried about? What? Where? When? Any witnesses? Include dates and times of any specific incidents referred to.

Any physical/behavioural/indirect signs?

Have you spoken to the child/young person/adult at risk? If so, what was said?

Have you spoken to the parent/carers(s)? If so, what was said?

Has anybody been alleged to be the abuser? If so, give details.

Have you consulted anybody else? Give details.

Your name and position:

In what capacity have you had any capacity have you had any contact with the child/young person/adult at risk?

To who reported and date reported:

Signature

Today's date

This form should be submitted directly to the DSL. If the form is unable to be submitted directly, please double envelope, mark confidential and place it on their desk.

DECLARATION

I confirm that I have read and understood Complicité's Safeguarding Policy.

Date:

Name:

Signature:

After signing please de-attach this page and hand it to Complicité's Creative Engagement Producer or email a copy of this page to natalie@complicity.org