



## **Imperial War Museums**

Safeguarding Policy and Safeguarding Procedures  
**Protecting Children and Adults at Risk**

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# POLICY

## 1. KEEPING CHILDREN AND VULNERABLE ADULTS SAFE

### **Introduction:**

IWM is committed to the principle that all children and adults at risk, who may additionally be vulnerable adults, which is further defined below, who access the museums, its exhibitions, collections, staff, and resources, whether on or off-site, should be safe and protected from harm. This policy is aimed at everyone who works with or at IWM, to explain in simple terms, what is involved in ensuring this commitment is upheld across every part of IWMs work. This follows the expectations of the IWM Board of Trustees and in compliance with the law that applies to IWM as a charity.

### **Safeguarding Statement:**

IWM considers that:

- The welfare of children and adults at risk who may also be vulnerable adults is paramount.
- All children and vulnerable adults have the right to protection from harm irrespective of their age, culture, disability, gender, language, racial origin, religious beliefs, or sexual identity.
- Our staff will ensure that the IWMs physical and virtual spaces are safe and secure and promote enjoyable and positive experiences.
- All suspicions and allegations of harm will be taken seriously and responded to promptly and appropriately and reported in compliance with IWMs safeguarding procedure.
- All IWM representatives (whether permanent, temporary, freelancers, volunteers, or contractors) working at the IWM, engaged in outreach activities or other programmes, will be aware of their paramount responsibility to ensure the safeguarding of children and vulnerable adults who have contact with IWM.
- As employers, IWM practice safe recruitment processes, to ensure that our staff and volunteers do not pose a risk of harm to children or vulnerable adults.

### **Safeguarding Procedure:**

The associated safeguarding procedure is set out later in this document. It describes some of the signs and circumstances in which safeguarding concerns may arise and provides the procedure to report and record such concerns and, where necessary, report on to the relevant statutory bodies, as listed above.

## For the purposes of this policy the following DEFINITIONS apply:

- **Children** are defined by law as such if they are under the age of 18. This is not affected by any other factor such as special educational needs or disability.
- **Vulnerable Adults** are defined as individuals of 18 years or over, who are, or may be, in need of care or support services because of age, illness, physical or learning disability, or those who are unable to take care of, or protect themselves, against harm or exploitation. The definition of an adult at risk is specific to those who require support and are additionally unable to protect themselves from abuse. It is those individuals who have protection under the Care Act 2014. A vulnerable adult may be an individual who has, for example, a degree of dementia but would not be classified as an Adult at Risk under the Care Act 2014 unless they are experiencing or are at risk of abuse or neglect and because of their need for care and support cannot protect themselves. The term vulnerable adult is often used interchangeably but the definition of an adult at risk is specific to the definition above.
- **Safeguarding** is protecting individuals from maltreatment and preventing impairment of health and development.
- **Responsible Adults** are defined as people of 18 and over who assume responsibility for children or vulnerable adults during a museum visit (e.g., teachers, parents, and group leaders). However, we recognise that some parents may be under the age of 18 and will be responsible for their own child/children while in the Museum.
- **DBS** – The Disclosure and Barring Service (DBS) is the statutory body currently responsible for storing data about those unsafe to work with children and vulnerable adults. They carry out criminal record checks, known as DBS checks, on those whose work brings them into contact with children or vulnerable adults. They are also responsible for barring certain individuals from being allowed to work with children or vulnerable adults and maintaining the Barred Lists.

## 2. CATEGORIES OF ABUSE

Working at IWM, even in an educational role, is not a setting where you are likely to have ongoing contact with the same children, young people, or vulnerable adults and IWM is not an organisation whose primary function is safeguarding. Nevertheless, in order for all staff and volunteers to protect children and vulnerable adults from abuse it is essential that good safeguarding practices are followed, that this policy and procedure are given the attention they deserve and that we understand what to do to ensure we can and do take the right action at the right time.

1. These are the main categories of abuse:
2. Physical abuse
3. Emotional abuse
4. Sexual abuse
5. Neglect
6. Financial or material abuse (of vulnerable adults)
7. Institutional abuse (Repeated poor care of a vulnerable adult through neglect or poor professional practice)
8. Radicalisation (applying to both children and adults)

Every individual is unique, so behavioural signs of abuse will vary. In addition, the impact of abuse is likely to be influenced by the individual's age, the nature, extent and setting of the abuse, and the help and support they receive.

### 3. CODE OF CONDUCT IN SAFEGUARDING

Codes of conduct are in place to protect children and vulnerable adults but also to protect staff and volunteers against misunderstandings. Following these practices ensure boundaries are not crossed.

#### Do:

- Recognise the position of trust in which you've been placed.
- Act professionally in all matters. Always keep other members of staff/volunteers informed of where you are and what you are doing.
- Approach any child or vulnerable adult apparently in distress and ask if you can help.
- Seek assistance from colleagues, security, or supervisors where appropriate.
- Be aware of the possibility of danger from others, and question situations that you find suspicious.
- Keep a look out for children who are apparently unaccompanied.
- Communicate the details of any lost children to the appropriate central point, see the lost children or vulnerable adult paragraph.
- Keep any lost child or vulnerable adult in a public area where they can clearly be seen.
- Report an allegation (even if this is just a suspicion) of abuse or inappropriate conduct to a Designated Safeguarding Officer within one hour and always, without fail, within the same working day that the incident has occurred.

#### Practices to be avoided:

- Avoid spending time alone with children and vulnerable adults, take simple precautions e.g., keep a door open if alone with someone.
- Avoid physical contact other than in emergencies.
- Attempting to *investigate* concerns or allegations that abuse has, or may have, occurred. Investigation beyond checking basic facts is not a matter for the museum but for the statutory authorities. Beyond a certain point investigation excepting where conducted by the Police in controlled circumstances may damage the prospects for successful conviction where a crime has been committed.

#### Practices never to be sanctioned:

You should never:

- Take photos or film any child or vulnerable adult for personal use. Photos needed for professional use should be cleared in writing with your manager.
- Allow or engage in inappropriate touching of any kind.

#### You should be aware that:

- The desire to be touched should always be initiated by the child, or vulnerable adult e.g., a child holds your hand, a frail older person, or a person with learning disability links your arm.
- Touch should always be appropriate to the age and stage of development of the child.
- You should never engage in rough, physical, or sexually provocative games, including horseplay.
- You should never physically restrain a child or vulnerable adult, except in exceptional circumstances. (e.g., to prevent injury to the child or vulnerable adult, or to another person resulting from their behaviour) To prevent damage to property, exhibits, collections, or to prevent theft it is possible for security to detain a person and to use

reasonable force to do so but they must be sure that an indictable offence is being, or is about to be, committed and that it is not reasonably practicable for a police constable to make an arrest of that person.

- You should not do things of a personal nature for children or vulnerable adults that they can do themselves, or that a parent/leader/personal support worker can do for them.
  - NOTE: It may sometimes be necessary for staff or volunteers to do things of a personal nature for children or vulnerable adults, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents/carers and the person involved and where there is no practical alternative. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible.
- You should not accompany children or vulnerable adults to the toilet or undertake personal care. This should be the role of teachers, parents, or carers/support workers.
- You should not meet with or contact children or vulnerable adults outside of the work context for any purpose.
- You should never make suggestive remarks or threats or use any other inappropriate language, even in jest.
- You should never allow people to use inappropriate language about a vulnerable adult unchallenged.
- You should not allow allegations made about a vulnerable person to go unchallenged, unrecorded, or not acted upon.

#### **4. UNACCOMPANIED CHILDREN & VULNERABLE ADULTS**

Visits by unaccompanied children under the age of 14 are discouraged. Children aged 14 and over are welcome to visit, take part in activities (e.g., family events) without a responsible adult. If an issue arises then next-of-kin details will be sought, and parents/carers will be contacted. Unaccompanied children are to be closely monitored by staff as they move around the building to ensure their safety.

#### **5. ADULTS WITHOUT CHILDREN & ADULTS OBSERVING SESSIONS**

Adults without children are discouraged from taking part in family events but may be allowed to do so at the discretion of the event leader should they be wanting to learn by observing sessions and places are available (i.e., places should be given to families/intended participants first).

If the event leader has any concerns about the motivation of the adult, then they must not allow them to take part and should involve Security if necessary.

#### **6. REQUEST FOR INFORMATION ABOUT CHILDREN AND VULNERABLE ADULTS**

Staff must not give anyone (with the exception of the emergency services or social services) information about children or vulnerable adults in the Museum, regardless of who the person claims to be. Any request for information, including whether the child or vulnerable adult is in the Museum, (e.g., if someone wishes to hand something to them), should be dealt with by contacting the child/vulnerable adult's responsible adult, who should take the decision whether or not to provide the information.

## **7. WORK PLACEMENTS**

The Museum may provide work experience placements to school pupils who are under the age of 18. It is vital that the pupils are supervised by a member of staff who has been the subject of an enhanced DBS check and where applicable a Barred List check and that they are not left alone with anyone who has not been subject to the same level of security checks. The supervisor must ensure that the pupil/ student is not put at risk. Prior to the placement the designated supervisor should also obtain the telephone number and other contact details of the teacher at the pupil's school or college who is responsible for work experience placements, and of the pupil's responsible adult (i.e., a parent or carer), so that they can be contacted should any issues arise or in the case of an emergency.

## **8. SENSITIVE CONTENT**

Staff should bear in mind that children and vulnerable adults may have complicated or traumatic backgrounds and histories which could make them sensitive to certain issues (e.g., discrimination, disability, health, family relationships, early childhood, being sought by someone who is already known to be unsafe etc.) Any potentially sensitive content or adult material should be discussed in advance of the session with teachers, parents or group leaders. Where this is not possible, e.g., in the case of a family or adult event, the issues should be covered with sensitivity. Staff developing exhibitions or events should also bear this in mind and designs should give visitors choices about whether or not to engage with sensitive content. A small number of children are protected by conditions imposed by the Courts. For example, some parents are regarded as a source of such risk to a child that they are not permitted any contact and are not permitted to know a child's location. This has to be born in mind when considering events for children where their identity could be detected.

## **9. PHOTOGRAPHY**

Images of clearly identifiable individuals constitute personal data and should be collected and managed in accordance with Data Protection legislation. This includes informing individuals when photography or filming is likely to take place. For audience/group photography, this can be done via the following:

- Signs at the Museum's entrances
- Signs immediately outside the area being filmed
- Statements on booking forms and tickets
- Statements on the website

The department organising the event is responsible for deciding which method is most suitable and for liaising with staff at each branch. Sample wording can be found in GDPR Guideline 13: GDPR and Taking Museum Photographs.

Signs will be prominently placed and readable from a reasonable distance. Front of house staff will be fully briefed and available to answer queries. Where signs are not practical (for example if photography is taking place outside the buildings themselves), staff must be available to warn people where necessary.

### **Consent and permission:**

Sometimes, particularly when dealing with images focused on children or vulnerable adults, specific consent is needed for the taking, storage and use of images. Further information on the most common scenarios:

- School Groups - parental consent should be requested via the school in advance of the activity, or very soon after if this has not been possible. Until consent has been confirmed any materials must be treated as being without the right to use. Note that the power to give consent is restricted to those with PR, 'parental responsibility' in law, generally meaning legal parents or guardians. Teachers, of whatever seniority, do not have this power in relation to pupils.
- Groups with vulnerable adults - Where the person being photographed lacks capacity (meaning capacity within the meaning of the Mental Capacity Act i.e., the ability to consent) in relation to specific activity then written permission should be obtained from their representative. This may be their carer, parent/guardian, or a person in possession of a welfare deputyship order from the Court of Protection.
- Family Events - permission in writing from the children's parents/carers (persons with PR) should be obtained on the day.
- Larger public events - Where photographs of whole museum spaces are required and it is not feasible to obtain consent due to the number of people, or where people are too distant to be recognised, signage should be prominently displayed as above in advance of, and during the photography, informing visitors that photographs will be taken in that area between specified times.

### **Use of images:**

- Photographs or videos of children or vulnerable adults (individuals or in groups) where people could be recognised must not be taken without obtaining permission. This applies to all photographs that may be used in any form of publication or broadcast, marketing materials of any kind including leaflets, brochures, websites, social networking sites and films etc.
- If photographs of children or vulnerable adults are to be used in printed materials, provided to the press, or included on websites etc., any information which could be used to identify or trace the children or vulnerable adults should be withheld (e.g., names of individuals, names of schools, groups, or institutions). Crests, badges etc. on uniforms which feature the name of a school should not be shown or the school's name should be digitally obscured where possible. If an image is to be used over a period of more than three years further consents should be obtained annually thereafter to ensure that as the child or young person grows and matures, they have the opportunity to withdraw their consent to the use of that image. Where providing the name of an individual, school, group etc. is important (e.g., when celebrating an achievement, competition winners etc.) written permission should be obtained from the subject or their proper representative. Any information which could be used to identify or trace individuals should not be given to any enquirers.

### **Suspicious photography:**

It is lawful to take photos of anyone, including children, in the UK, though of course IWM can bar the taking of photos or images in any of its spaces. Any suspicious photography is likely to be judged to be suspicious because of what appears to be the intentions of the photographer. Is this person seeking images of children or other visitors with the intention of obtaining images for harmful or criminal purposes? Is this person more interested in taking images of a school group than of any exhibits, for example? If you observe anyone taking repeated photographs or videos of children they do not appear to be accompanying or related to in any way, especially if they are following such a group around the museum, it may be necessary to challenge them and ask that they explain how they are associated with the child or children they are following and taking images of. If there is not an acceptable response then call security as there may be malevolent intent, in order to create harm or harassment, or for indecent purposes.

## **10. WEB AND E-LEARNING PROJECTS**

The email or personal website addresses of children or vulnerable adults should not be disclosed by staff under any circumstances and are not to be used to contact those individuals except for approved professional purposes. Approval can only be obtained with DSO and Senior Managers agreement.

Material submitted by children or vulnerable adults to the Museum website should be treated in the same way as photographs (see paragraph above), i.e., any information which could be used to identify or trace individuals should be withheld unless written permission is obtained.

Contributors of user generated content (UGC) are made aware of any content that is personal and likely to put people at risk.

## **11. CONFIDENTIALITY**

The requirements of the GDPR apply to all materials considered above.

Every effort will be made to maintain confidentiality and guard against publicity while an allegation of abuse is being investigated/considered. We will ensure information you share is accurately recorded and only shared with people who need to see it. Information will be stored securely and in accordance with the GDPR. It should be noted that safeguarding information is regarded as special category data under the GDPR and under defined circumstances may be shared without consent. Your DSO will manage such information sharing in accordance with the advice of statutory authorities where necessary.

## **12. MANAGEMENT OF ALLEGATIONS AGAINST STAFF**

IWM will take seriously any allegations that a member of staff, either paid or unpaid, has:

- Behaved in a way that has, or may have, harmed a child, young person, or vulnerable adult.
- Possibly committed a criminal offence.
- Behaved in a way towards a child, young person, or vulnerable adult, that indicates an unsuitability to work with this audience.

We have a duty of care to our employees and will ensure we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a member of staff or volunteer at the IWM is dealt with quickly, in a fair and consistent way that provides effective safeguarding protection and at the same time supports the person who is the subject of the allegation.

Staff should be aware that a serious allegation may result in:

- A police investigation.
- Enquiries by Social Services.
- Consideration by IWM of disciplinary action in respect of the individual.
- A report being made to the DBS for a Barring decision to be made, where applicable.

### **Resignations and "Compromise Agreements"**

The fact that a person tenders his or her resignation, or ceases to provide their services, will not prevent a safeguarding allegation being followed up in accordance with this policy. Every effort will be made to reach a conclusion in all cases of allegations, bearing in mind the safety or welfare of children, young people, or vulnerable adults, including any in which the person concerned refuses to cooperate with the process.

Wherever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation and reaching a judgement about whether it can be regarded as substantiated will continue even if the person does not cooperate.

Similarly, so called "compromise agreements" by which a person agrees to resign, the IWM agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, will not be used in cases of alleged abuse. In any event, such an agreement cannot prevent a thorough police investigation where that is appropriate. Furthermore, it will not override the statutory duty to make a referral to the Disclosure and Barring Service (DBS) for consideration of placing the person's name on the Barred List, where circumstances require that.

### **13. SAFER RECRUITMENT**

Human Resources will work with the appropriate line managers to ensure that all IWM posts are risk assessed to ascertain the level of security and Disclosure Barring Service (DBS) checks required at the point of recruitment. Human Resources will maintain a record of all such checks undertaken.

Application materials for employment and volunteer packages will include a statement of the IWM commitment to child/ adult at risk protection, indicating to all prospective employees/volunteers the principles to which we adhere. Interviews for sensitive posts where, for example, it is expected that the member of staff may have DSO or Regulated Activity responsibilities, will include deterrent interview questions.

Upon selection of a candidate for a post, including the appointment of volunteers, please check with Human Resources to obtain the appropriate level of criminal records and Barred List disclosure for specified posts.

For all posts the appointment will be conditional upon the outcome of the security clearance enquiries. Security team and HR will retain a record of all security clearance checks undertaken.

Long serving employees who may get transferred to posts considered sensitive for the purposes of Safeguarding policy will require Enhanced DBS clearance before taking up the post. In all such cases HR must be consulted before the move is implemented.

### **14. INDUCTION AND TRAINING**

All new staff will receive induction guidance. This induction will include familiarisation with the IWM Safeguarding Policy and Procedures.

Staff and their managers are in the best position to recognise risk and identify where additional procedures would support staff in their management of safeguarding issues. As such, it is suggested that managers and their staff develop role-specific procedures, using

the code of conduct and training with advice from DSOs, with due reference to these procedures and the accompanying policy.

Human Resources will ensure that regular training and update sessions on safeguarding children and adults at risk are made available to all relevant staff, including both new and existing staff.

## **15. MARKETING**

Marketing to children is possible within limited circumstances. Any such marketing activity must take care not to bring the brand and reputation of the museum into question or disrepute. IWM must take additional care in marketing to children because of the sensitive and controversial nature of the museum's subject and must avoid creating safeguarding risk in the pursuit of marketing activity.

IWM will not:

- Market goods for sale directly to children without parental (meaning PR, those holding parental responsibility) consent.
- Use free gifts or other forms of enticement to encourage them to buy commercial or third-party goods for sale without parental consent.
- Direct any marketing campaigns at children under the age of 13, without parental consent (GDPR and Data Protection Act 2018).
- Approach children directly, by post or email, social media or through the website, without a clear statement about first seeking permission from their parent/carer.
- Ask children to provide personal data that is not strictly necessary for the purposes of communicating with them.

IWM will:

- Seek parental/carer consent, in writing, prior to any direct contact with their child/children.
- Ensure that any IWM services that are marketed to children are age-appropriate, relevant, child-focused, and educational (such as kids' clubs, newsletters, Friends membership, etc.)
- Make reasonable efforts to verify the age of children signing up for marketing and keep an accurate record of the source, storage, management and disposal or marketing data relating to children.