



## SAFEGUARDING POLICY 2024-2025

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## 1. POLICY STATEMENT

The SEA LIFE TRUST (SLT) operates sanctuaries which attract visitors including children and young people. We also organise and run conservation activities (e.g. beach cleans) that involve children and young people.

Given our commitment to health, safety and welfare we must ensure that children and young people can enjoy themselves in safe and secure environments and are not harmed in any way through contact with SLT. We must take all reasonable and practical steps to ensure that this is the case.

Having safeguards in place not only protects and promotes the welfare of children and vulnerable persons but also enhances the confidence of trustees, staff, volunteers, parents and the general public.

SLT believes that:

- The welfare of a child is paramount and all have a right to equal protection from all types of harm or abuse
- The best interests of the child are paramount in all considerations about their welfare and protection, including when to maintain confidentiality and when to share information
- Safeguarding is everyone's responsibility and everyone has a role to play in safeguarding children
- Concerns or allegations that employees have abused or neglected a child will be managed sensitively and fairly in accordance with this policy, relevant legislation and guidance

## 2. DEFINITIONS

**A Child** - As stated in the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. In this document "children" is taken to include young people up to 18 and includes any child or vulnerable person benefitting from a service or activity provided by SLT.

**Business Partners** means any third party that SLT works with who comes into contact with children during the course of the relationship with SLT.

**Safeguarding** is defined in "Working Together to Safeguard Children 2015" issued by HM Government as:

- protecting children from maltreatment
- preventing impairment of health and/or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- taking action to enable all children to have the best outcomes

**Employees** means employees of any entity within the SLT

**Parent(s)** means any parent, guardian or carer

### 3. PURPOSE AND SCOPE

The policy is essential because it provides a clear process for employees, business partners, volunteers or parents. This ensures everyone is clear about roles, responsibilities and expectations to protect children at risk from harm. This document applies to all activities and services offered by SLT.

### 4. APPLICATION OF THE POLICY

This policy applies to all employees, business partners, volunteers and parents.

The work carried out by SLT is diverse and involves working with multiple parties. Our business partners, employees and volunteers should adhere to this safeguarding policy at all times and where relevant, when working with business partners any of their equivalent policies, should also be followed.

We require that our business partners, (when in contact with children) share our commitment to safeguarding. We will expect them to demonstrate this to us by having their own safeguarding policy and procedures in place that are “fit for purpose” before any partnership agreement is agreed and continued. If the business partner does not have their own safeguarding policy the business partner must agree to adhere to the SLT policy.

Employees and volunteers are subject to the SLT Code of Conduct – refer to section 10 (page 6).

### 5. COMMUNICATION OF THE POLICY

To ensure the successful implementation of this policy it is essential that SLT communicate to staff, volunteers, business partners, children and their parents our commitment to safeguarding.

Access to the policy is available via the SLT website. This ensures people have access to this information and able to understand both how the policy will be implemented and the process they should follow should an issue arise.

### 6. MONITORING AND REVIEW

The implementation of procedures will be regularly monitored and reviewed.

The policy will be reviewed every year or whenever there is a major change in the organisation or in relevant legislation and/or good practice guidelines.

As SLT has a close association with Merlin Entertainments and has frequent access to the attractions, an annual declaration from Merlin will be required to confirm that the Merlin Group’s Protection of Children policy is adhered to in all locations.

### 7. PROMOTING GOOD PRACTICE

All employees, business partners, volunteers and parents have a responsibility to identify and share safeguarding concerns.

It is NOT the responsibility of employees, business partners, volunteers or parents to make judgements about whether abuse is taking place. It is, however, their responsibility to act if they have concerns about the welfare of a child, as explained in section 16.

## 8. FORMS OF ABUSE

This policy is concerned with protecting children from harm, and specifically from abuse and neglect.

There are 4 categories of abuse namely:

- **Physical abuse**  
This is where someone physically hurts or injures a child by hitting, shaking or by giving them alcohol or inappropriate drugs.
- **Emotional abuse**  
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their emotional development
- **Sexual abuse**  
Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.
- **Neglect**  
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development.

## 9. VIGILANCE

It is important that employees are vigilant and take action when they become aware of a possible case of abuse, or of a child who is acting in an agitated manner, or a parent who appears to be in a distressed state. Employees also need to be alert to a child being approached by an obvious stranger, or for any signs of inappropriate behaviour patterns by a colleague when children are close by.

Employees also need to take care that they do not place themselves in a situation with children which could be potentially compromising.

## 10. CODE OF CONDUCT FOR EMPLOYEES AND VOLUNTEERS

This outlines the conduct expected of all employees and volunteers. The code will serve to safeguard and protect children. It will also help everyone to maintain appropriate standards of behaviour and reduce the possibility of allegations of abuse being made against them.

It is important that employees and volunteers are aware that they may be seen as role models by children and therefore must behave in an appropriate manner at all times by upholding the SLT's code of conduct. They should also be mindful that their behaviour should reflect the spirit of the code of conduct in their personal life as well and should not behave in a way that would undermine the reputation of SLT, be it in a professional or personal capacity.

Code of Conduct – Appendix A (Page 10)

## 11. IMAGES OF CHILDREN

In some circumstances SLT requests permission to use photographs, videos and quotes provided by young people and families taking part in SLT activities, for promotional materials and in internal communications. This could include using information in posters, leaflets, reports, newsletters, on websites (including social media sites such as Facebook), in promotional videos and in newspaper articles.

Where imagery/quotes are requested the appropriate supervising adult is required to complete a data consent form – see Consent Form – Appendix B. If the consent form is not received, no imagery/quotes are permitted for use by SLT for any purpose.

## 12. LEGISLATION, RELEVANT POLICIES AND PROCEDURES

Safeguarding and promoting the welfare of children is a broad concept. Therefore, policies and procedures which contribute to safeguarding should also be followed by those to whom they apply or when relevant.

The Merlin Group documents below should be considered:

Policy	Version dated
<a href="#">Whistleblowing Policy</a>	October 2020
<a href="#">Protection of Children and Young People HS(P) 008</a>	October 2013
<a href="#">Social Media Policy</a>	May 2021
<a href="#">Child Safeguarding Policy HS(P)012</a>	May 2023

## 13. LEGISLATION AND GUIDANCE

Our policy is underpinned by English legislation and statutory guidance which includes:

UN Convention on the Rights of the Child 1991

Data Protection Act 1998

Children Act 1989 and 2004

Sexual Offences Act 2003

Working Together to Safeguard Children (HM Government 2015)

What to do if you are Worried a Child may be being Abused (HM Government 2015)

## 14. EMPLOYMENT PROCEDURES

SLT need to have a thorough recruitment system that helps to ensure that unsuitable people are not employed in the first instance. These standard procedures should include for all positions:

- Confirmation of identity and home address
- Confirmation of the right to work in the country in question, where the applicant is not a national
- Checking of references and employment history
- Checking of qualifications, where appropriate

- A question requiring confirmation as to whether or not the applicant has any unspent convictions (where it is legal to ask such a question)
- A declaration related to working with children.

All of the above should be carried out upon making an offer of employment and not during the interview or recruitment process itself.

A Disclosure and Barring Service (DBS) check in the UK, or local equivalent overseas “disclosure” where available, must be taken for all roles where a risk assessment of specific jobs might have regular unsupervised contact or close contact with children. For further information on the level of checks to be carried out please refer to local recruitment policies and procedures. For the UK please refer to the Disclosure and Barring Service Policy.

Where an existing employee moves into one of these designated posts from an area which does not require disclosure then the disclosure process above should be carried out.

If the disclosure report indicates that an individual has had a caution in connection with a child, or has committed an offence of abuse against a child, then that person will not be considered for employment of any kind within SLT – whether existing employees or new recruits. Where a report indicates that some other offence has been committed, whether for new recruits or existing employees, this will be considered individually, based on the nature of the job role, the working environment and specific application.

This is in line with offender rehabilitation laws/practice, such as the UK Rehabilitation of Offenders Act and overseas equivalent laws.

## 15. CULTURE AND PROCEDURAL GUIDANCE

SLT sanctuaries must have a procedure for dealing with lost children and investigation of suspected cases of child/young person abuse, including procedures for involvement of the appropriate authorities should an allegation or potential case of abuse come to light. The management team on site has the responsibility for ensuring that these procedures are in place and that they are communicated effectively.

### General Considerations

Considerations to be taken into account when developing training and procedures include:

- Respect children/young people at all times, regardless of their age, gender, ethnicity, disability or sexual identity
- Remember that children look up to adults as role models; behaviour, language and gestures must therefore be appropriate at all times
- Do not engage in or tolerate inappropriate physical activity involving children/young people
- Take suitable action if you become aware of anyone behaving in an inappropriate way towards a child or young person, calling for assistance if needed
- Never let allegations by a child go unreported, including any made against you (these may be “mischievous” or even “malicious” allegations and pre-emptive reporting can help further investigation)
- Do not engage in or tolerate any bullying of a child, either by an adult or by other children
- Avoid unobserved situations of one-to-one contact with a child/young person; if it is unavoidable, try to do so in the open or, if indoors, always keep a door open and ensure that you are within hearing range of other adults



- Never enter a room where an unaccompanied child/young person may be changing their clothes, without first clearly getting their consent to enter (in such cases, also try to be accompanied by another adult)
- Ensure that there is a procedure for alerting the Police or Social Services (or local equivalent) where there is a suspicion of abuse towards a child or young person (see also section 8)

## 16. RESPONDING TO SUSPICIONS OR ALLEGATIONS OF CHILD ABUSE

Allegations or complaints of abuse must be dealt with in a sensitive way. Management and employees are not responsible for deciding whether a child has been subject to abuse. However, they are responsible for reporting suspicions to the Police.

Where a child/young person makes an allegation or confides in an employee about abuse either at the location or elsewhere, employees should show that they believe the child and that they take the allegation very seriously. Where an allegation is about an employee of the SLT, any such allegation will be fully investigated, in cooperation with the authorities, and standard HR policies and procedures will be followed.

### **What to do if there are concerns:**

In such situations, or where concern exists, any suspicion, allegation or incident of abuse must be reported to an immediate line manager. The Head of the SLT is responsible for reporting to the relevant authorities.

### **Recording Information**

All information shall be treated as confidential and a record kept of all aspects of an incident, which should include at least:

- the nature of the allegation
- a description of the alleged occurrence and person involved
- the location
- a description of any visible injuries
- all times and dates, including when the authorities were notified

Whilst giving support, and clarifying the circumstances, employees should never counsel or lead the child with questions as this may hinder any subsequent legal action. Interviews must be left to the Police or Social Services.

## 17. TRAINING

It should be clearly recognised that whilst checks are part of the employment process, these must be operated in conjunction with appropriate training. Employees should be made aware of how to recognise sensitive and possible abusive situations, how to report them and of how to avoid possible compromising situations, e.g. being left alone with a child.

## 18. APPENDICES

### APPENDIX A – SLT CODE OF CONDUCT FOR EMPLOYEES AND VOLUNTEERS

#### All Employees and Volunteers **MUST**:

- Treat all children equally, respectfully, with warmth and empathy, and listen to their wishes and feelings
- Encourage a non-discriminatory environment
- Behave in a calm, positive, supportive and encouraging way with children
- Ensure you report on any suspicions, concerns, allegations or disclosures made by a child or parent including poor practice, including any suspicions about “grooming” behaviour, concerns and allegations about which you must report
- Ensure that the focus of your relationship with a child (including their family in some cases) that you have met through SLT remains professional at all times; the aim should never be to develop the relationship into a friendship or intimate relationship
- Ensure that any use of social media sites remains professional at all times; there should be no direct personal or private on-line relationship with a child or their family who is known to the employee as a result of being associated with SLT – any requests from children to engage directly should be politely declined, all contact via any social media site should be kept public, and instant chat must not be used at any time to communicate with children
- Endeavour to plan activities that involve more than one other present being present, or at least within sight of others
- Respect a child’s right to personal privacy but never agree to keep any information relating to the harm of a child confidential
- Ensure that dangerous or otherwise unacceptable behaviour, including bullying, is challenged and addressed
- Be aware that children can develop infatuations (crushes) towards adults; if this is happening, you should tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- Ensure that if a child needs physical comfort that this is done in a way that is both age appropriate and respectful of their personal space, never acting in a way which may be perceived as threatening or intrusive; always check out with a child before you act to make sure they are comfortable with you touching them – physical contact should not be done in a hidden or secretive way that could be misconstrued by the child or anyone else observing it, and physical contact should be limited to a hug or touch of the arm/hand
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that you are doing this in a way that other colleagues can observe you

#### You must **NOT**:

- Conduct a sexual relationship with a child or indulge in any form of sexual contact with a child regardless of the age of consent, which would constitute a breach of a position of trust and is never acceptable – even if the child is aged 16 years or above and can legally consent to a sexual relationship in the UK
- Swear or make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children
- Engage in or allow any sexually provocative games involving or observed by children, whether based on talking or touching

- Show favouritism or gossip about children
- Rely on your reputation, position or SLT to protect you
- Ask a child questions which may be construed as sensitive without first consulting with the person responsible for the child
- Let any allegations of abuse or poor practice go unchallenged or unreported
- Maintain confidentiality about sensitive information to safeguard a child
- Work under the influence of alcohol or drugs
- Smoke, vape or drink alcohol in front of children
- Discuss your own personal/sexual relationships in front of children
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, and e-cigarettes from or to a child or their family
- Use any type of physical punishment in order to discipline; shouting at children should also be avoided whenever possible and only if alternative forms of discipline have failed
- Do things of a personal nature that the child can do for themselves
- Steal, or condone someone else's stealing, regardless of the value the stolen item
- Photograph or film children for which no prior consent has been sought
- Administer first aid involving the removal of clothing unless in the presence of their parents or others
- Show any audio and/or visual material (CDs, DVDs, videos, photos, films, computer or games etc.) that has inappropriate content for children
- Arrange to meet a child outside of your work context where the purpose is one of friendship or an intimate relationship

## APPENDIX B - DATA CONSENT FORM

### The SEA LIFE TRUST – Photo/Data Consent Form INDIVIDUALS/FAMILIES ONLY

#### How would we like to use your information?

The SEA LIFE TRUST (SLT) would like to be able to use photographs, videos, quotes that you provide and other personal information about your involvement in SLT activities (referred to in the rest of this form as "Your Information"), in promotional materials and in internal communications. This could include using Your Information in posters, leaflets, reports, newsletters, on websites (including social media sites such as Instagram and Facebook), in promotional videos, and in newspaper articles.

#### Where will Your Information be used?

If you agree, materials including Your Information may be displayed at SLT premises and at conferences, exhibitions, and training events (including charitable, fundraising, or promotional events) and used in promotional materials that are shared via our websites, social media sites and other advertising and promotional channels.

#### What happens if you change your mind?

If you sign this form to give consent for use of Your Information, the consent is valid from the date of signature until you withdraw your consent. SLT may continue to use Your Information for the purposes listed above unless and until you notify SLT that you withdraw consent. You can withdraw consent at any time by emailing [help@sealifetrust.com](mailto:help@sealifetrust.com).

If you withdraw your consent, Your Information will not be used in any future materials. In relation to materials already printed or produced, please note that it may not always be possible to recall all materials or stop all current use of materials immediately.

#### Permission

By signing the below, you confirm that:

- a) you explicitly consent to; and
- b) either the child/children is under the age of 13 or, where any child is 13 years of age or older, you have obtained (and will produce on request by SLT) from each child, over the age of 13, to whom the application relates, explicit consent to
  1. photographs and/or still or moving images of yourself, or young people for whom you have parental responsibility, taken during the trip for which SLT has provided tickets or during any other activity arranged by SLT, or any other photographs and/or still or moving images which I choose to send to SLT; and
  2. personal information that I have provided to SLT relating to yourself and/or young people for whom you have parental responsibility; and
  3. any quotes that you, or young people for whom you have parental responsibility, offer about the experience provided by SLT.

Your Name .....

Relationship to child (if signed on behalf of child) .....

Signature .....

Date .....

Description of photo content:

Once signed, please scan and email [help@sealifetrust.com](mailto:help@sealifetrust.com)