



## **Flaircube Ltd - CHILD PROTECTION POLICY UPDATED 20<sup>th</sup> June 2023**

Flaircube Ltd (trading under '*FlairBox*' and hereby referred to as '*FlairBox*') have a moral and legal responsibility to safeguard children from harm and abuse. This means to ensure that we follow correct procedures to protect children and report any concerns about their welfare to appropriate authorities.

There are three elements to our policy:

- Protection of children's data
- Parental controls and consent procedures with regards to their child's data
- Vetting and monitoring process for industry professionals in order to ensure they are legally compliant with child protection regulations

The aim of the policy is to promote good practice, providing children and young people with appropriate safety/protection whilst showcasing their work on *FlairBox*. It will also allow staff, agencies, casting professionals, directors, producers and anyone else who may come into contact with the child's work to make informed and confident responses to specific child protection issues.

### **DATA PROTECTION**

We acknowledge that children's data merits special protection under the UK General Data Protection Regulation and the Data Protection Act 2018 and that some of the information submitted to *FlairBox* may constitute special category data. We take extra care when collecting and processing children's and young person's data as they may be less aware of the risks involved in providing such data. We inform the children and young persons we work with, as well as their parent/ legal guardian, about their rights under the data protection legislation. *FlairBox* (under Flaircube Ltd.) is also registered with The Information Commissioners Office (ICO) -The UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") also require us to inform parents and legal guardians (as used in this, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 16 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information. *FlairBox* does not knowingly collect Personal Data on our Websites from users under the age of 16 without the prior consent of the child's parent or guardian.

*FlairBox* also acknowledges its obligations under the Age Appropriate Design Code that recognises that children should be given special treatment when it comes to their personal data and have a baseline of protection automatically by design and default.

This section notifies parents that (i) the types of information we may collect from children, (ii) how we use the information we collect, and (iii) our practices for disclosing that information is consistent with the other sections of our [Privacy Policy](#). This section also notifies parents of (i) our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent and (ii) all operators that collect or maintain information from children through Websites.

This section only applies to children under the age of 16 and supplements the other provisions of our [Privacy Policy](#).

## **PARENTAL CONSENT**

Only a Parent or Legal Guardian of a child under the age of 16 years old may create an account on FlairBox.co to promote their child's performing arts career. When creating a FlairBox Actor Profile on behalf of their child, the Parent or Legal Guardian will be asked to enter their child's date of birth. If the child is under 16 years of age, a Parent must affirm that they are the Parent or Legal Guardian of the Child whose profile they are creating, and consent to the release of the child's personal information within the FlairBox Actor Profile. FlairBox may require the Parent or Legal Guardian to transmit a scanned image or photograph of their driver's license or other official identification, such as a passport, to verify their date of birth.

When people use FlairBox, we know they expect an experience that is enjoyable, authentic, and safe. *As part of our ongoing commitment to providing users with features and resources to have the best experience on FlairBox, we have introduced **Private Account settings** and **Parental Settings** to help parents and guardians keep their children safe on FlairBox.*

In addition, only users that have passed FlairBox's vetting process will be able to contact users with under 16 accounts. If the user is represented by an agent, all contact will go through their agent.

## **Accessing And Correcting Your Child's Personal Information**

At any time, you may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information. You can review, change, or delete your child's personal information by:

- Logging into your FlairBox account and visiting your child's account profile page.
- Sending us an email to [privacy@flairbox.co](mailto:privacy@flairbox.co). To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

## **Parental Settings**

If you are a parent or guardian, you can use Parental Settings, accessible in the 'settings' are of your child's profile. Once you turn it on, you will be able to set controls including:

- **Discoverability:** Decide whether your child's account is private (you decide who can see their content) or public (any vetted industry professional can view their content).

## **Operators That Collect or Maintain Information from Children**

A list of all operators or processors that may collect or maintain personal information from children through the FlairBox website is available in the privacy policy on request to [privacy@flairbox.co](mailto:privacy@flairbox.co).

## **VETTING INUSTRY PROFESSIONALS**

Only industry professionals that have passed our vetting process will ever be able to contact a child's parent/guardian/agent through FlairBox. All industry professionals with access to the work of child members under the age of 16 will undergo a thorough vetting process in order to ensure that they are legally compliant with child protection legislation in order to work with children. This process will include:

- Online screening for membership with the appropriate professional body/bodies
- Company cross check with companies house
- Identification
- A recent DBS check.

We may also conduct the above checks on an ongoing basis in relation to any industry professional where we believe appropriate.

## **PREVENTION**

We recognise that the "entertainment industry" can be a very "adult" environment and we expect that all staff, parents/legal guardians, agents, casting directors, directors, and anyone else who comes into contact with children on FlairBox behave in an appropriate manner at all times, and remember that "The Welfare of the Child is Paramount".

FlairBox will therefore:

- Act within the Children's Act 1989 & 2004
- Act within The Children (Performances and Activities) (England) Regulations 2014
- Establish and maintain an ethos where children and parents feel welcome and familiar with their environment.
- Ensure that all children are treated with respect and dignity and are treated as individuals and offered equality of opportunities.

## **REPORTING PROCEDURE**

If a parent or child has any questions relating to this Child Protection Policy or believes that there has been a breach of this policy or wishes to report any

inappropriate behaviour on the FlairBox platform, then please contact us at: [privacy@flairbox.co](mailto:privacy@flairbox.co) or write to Flaircube Ltd, 66 Old Compton Street, Soho, London, W1D 4UH

We may update this policy at any time.