

# Safeguarding Policy

## Safeguarding Children, Young Persons and Vulnerable Adults

Issue Date: January 2018

Version: **3**

[hqtheatres.com](http://hqtheatres.com)

HQ THEATRES  
**TRUST**

**hq**  
THEATRES &  
HOSPITALITY

# Safeguarding Policy

## Safeguarding Children, Young Persons and Vulnerable Adults

### Declaration

I confirm I have received and read the Company's Safeguarding Children, Young Persons and Vulnerable Adults Policy and Appendices.

I understand my responsibility towards ensuring all Vulnerable Persons are acceptably safeguarded within my work location and in connection with its associated projects.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job role: **Safeguarding Officer/  
Deputy Safeguarding Officer/  
Responsible Person**

Issue Date: January 2018

Version: 3

## 1. PURPOSES AND SCOPE

The Company (HQ Theatres & Hospitality; see “Definitions” below) recognises that live theatre and the entertainment industries can have a very powerful and positive influence on anyone who comes into contact with them. Not only does a performing arts environment provide opportunities for enjoyment and achievement; it also helps to develop valuable qualities such as self-esteem, leadership and teamwork. Most Vulnerable Persons participate happily and safely in arts activities. (The term “Vulnerable Persons” includes adults and children as set out under “Definitions” below).

The Company recognises that it has a duty of care to safeguard all Vulnerable Persons with whom Company Personnel come into contact in the course of Company business. The Company interprets its safeguarding responsibilities as taking all reasonable measures to ensure that the risks of harm to Vulnerable Persons using Company premises or engaged in Company activities are minimised. In accordance with relevant safeguarding legislation, government guidance and good practice, the Company will adopt and implement appropriate and reasonable safeguards to promote and protect the safety and welfare of Vulnerable Persons using its premises or engaged in activities for which it is responsible. The purpose of this Policy is to establish and set out clear lines of responsibility, communication and action in respect of any concern relating to the welfare of a Vulnerable Person who is working with, or engaging with, Company Personnel, and / or using or visiting Company premises or visiting other premises as part of an activity or event for which the Company is responsible.

This Policy and the principles outlined in it apply to all Responsible Persons who work with Vulnerable Persons engaged in Company activities on or off Company premises, or are assigned by the Company to care for such Vulnerable Persons. The Company has a legal and moral obligation to ensure that, when given responsibility for Vulnerable Persons, all staff members (including managers and senior executives), agency staff, students, external partners and contractors, teachers, carers, chaperones, parents/legal guardians, volunteers and artistes) accept their responsibilities to safeguard Vulnerable Persons from abuse, attempted abuse or neglect. This means ensuring that everyone follows the procedures set out in this Policy to protect Vulnerable Persons and that any concern about the welfare of a Vulnerable Person is reported to the appropriate authorities. Safeguarding entails an obligation to seek to prevent, as well as to protect.

The Purposes of this policy are to promote good practice; provide Vulnerable Persons with appropriate safety and protection while they are in the care of the Company; and to allow those who are covered by this Policy to make informed and confident responses to specific safeguarding issues. The Company will do this by:-

- defining abuse and the terms commonly used in Safeguarding, as well as the terms used in this Policy;
- setting out the scope of this Policy, i.e. who and what it covers; and by
- setting out the way in which the Policy works, i.e. its principles, lines of responsibility, relevance to recruitment and training, the role of external partners and contractors, Policy review arrangements, data protection, and procedures for allegations of abuse against a staff member or other person.

## 2. DEFINITIONS

For the purposes of this Policy:

the term “Company” embraces not only HQT&H Limited but all of its wholly-owned companies involved in the management and operation of its activities, including HQT Trust;

the term “Policy” refers to this statement of policy as prepared by the Company, and the application of this Policy in the context of the Company’s activities. This Policy and appendices can be accessed on the Company’s website and the Company’s Intranet. Upon request to a Company officer (Safeguarding Officer; Venue Administrator; Theatre Director; HR Manager), hard copies will be provided;

a “child” or “young person” is defined as a person who has not reached 18 years of age;

a “vulnerable adult” is a person over the age of 18 years who is, or may be, in need of community care services by reason of mental, learning or physical disability, or age, or illness and who is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm or exploitation by others;

the term “Vulnerable Persons” embraces all children, young persons and vulnerable adults.

the term “Company Personnel” means all staff members including managers and senior executives, agency staff, students, external partners and contractors, teachers, carers, chaperones, parents/legal guardians, volunteers and artistes from time to time engaged by the Company in activities on its premises, or elsewhere;

the term “Responsible Persons” means Company Personnel who have direct and/or unsupervised responsibility for the safety and wellbeing of a Vulnerable Person or Persons who is / are working with, or engaging with, Company Personnel, and/or taking part in activities in, or visiting, Company premises. Responsible Persons engage with Vulnerable Persons when, for example, those Vulnerable Persons are child performers with professional companies; and / or are participants in an in-house production, in education activities, in youth theatre, or on work experience;

the term “External Partner / Contractor” means and includes visiting companies, freelance and community workers, and hirers, including private event hirers and arts professionals with direct responsibility for Vulnerable Persons on Company premises;

the term “Carer” includes carers, parents, guardians, teachers and / or chaperones and any others who are caring for a Vulnerable Person whilst he / she is performing in or engaging in activities on Company premises. Vulnerable Persons visiting Company Premises, performing in or engaging in activities on Company premises will usually be doing so under the care of a Carer;

the term "Abuse" means abuse, attempted abuse and neglect.

A Vulnerable Person is abused or neglected when somebody inflicts harm, or fails to act to prevent harm.

The term “physical abuse” may be used to mean hitting, shaking, or throwing; or even poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a Vulnerable Person.

“Physical harm” may be caused when a parent or carer causes or induces illness in a Vulnerable Person who is in the parent or carer’s care.

“Sexual abuse” means forcing or enticing a Vulnerable Person to take part in sexual activities, whether or not he / she is aware of what is happening, and may involve physical contact, including penetrative or non-penetrative acts.

“Non-contact activities” could mean (but not be limited to) involving Vulnerable Persons in looking at, or in the production of pornographic material, watching sexual activities or encouraging Vulnerable Persons to behave in sexually inappropriate ways.

“Neglect” is the persistent failure to meet a Vulnerable Person’s basic physical and/or psychological needs, likely to result in the serious impairment of the Vulnerable Person’s health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a Vulnerable Person from physical harm or danger, or the failure to ensure access to appropriate care or treatment. It may also include neglect of, or unresponsiveness to, a Vulnerable Person’s basic emotional needs.

“Bullying” is the term used to describe behaviour that hurts someone else, for example, name calling, hitting, pushing, spreading rumours about, threatening or undermining someone. It is usually repeated over a long period of time and can hurt a Vulnerable Person both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is referred to as “cyberbullying”.

“Emotional Abuse” is the persistent emotional ill-treatment of a Vulnerable Person which causes severe and persistent adverse effects on the Vulnerable Person’s emotional and behavioural development. It may involve conveying to the Vulnerable Person the impression or feeling that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age and developmentally inappropriate expectations being imposed on Vulnerable Persons. It may involve causing Vulnerable Persons to feel frightened or in danger, for example witnessing domestic abuse within the home or being bullied, or the exploitation or corruption of other Vulnerable Persons. Some level of emotional abuse is involved in all types of ill treatment of a Vulnerable Person, though it may occur alone.

### **3. RELATIONSHIP OF TRUST**

During the course of his / her work, a Responsible Person will come into working contact with Vulnerable Persons, for example, as a youth workshop leader, in a performance-related capacity or as a facilitator of work experience. Such contact can lead to a “relationship of trust”, which can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the

power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

The Company requires that such power or influence is never abused by a Responsible Person. All Responsible Persons engaging in work or an activity on behalf of the Company are required to recognise their responsibility towards the health, safety and wellbeing of the Vulnerable Person(s) they are working with, to which end, the Company requires that the following Guidance is adhered to.

- A young person's age does not necessarily reflect his / her maturity or emotional development and he / she may remain vulnerable to abuse. Young people between 16 and 18 years of age may legally give their consent to some types of sexual activity; however the law still classifies them as a child.
- If a person aged 18 or over is in a "relationship of trust" with a person of less than 18 years old, it is an offence for the older person to have sexual intercourse or engage in any other sexual activity with the younger.
- It is possible that, in a Company-facilitated youth project, a project leader may be in a "relationship of trust" with a young adult of up to 21 years of age. It is the Company's view that any form of intimate relationship between such project leaders and young adults between 18 and 21 years of age participating in the project is inadvisable and potentially harmful to the young adult; and that project leaders should treat such young adults participating in projects as still in a "relationship of trust".
- It is a condition of employment that Responsible Persons may not socialise outside of work with any Vulnerable Person with whom he / she engages in a work, performance or educational capacity on behalf of the Company. This includes contact through social networking which is unrelated to the work, performance or educational activity.

#### 4. STATEMENT OF PRINCIPLES

The Company will:

- act in accordance with its moral and legal responsibility to implement procedures through which it can discharge its duty of care for Vulnerable Persons, safeguard their wellbeing and protect them from abuse;
- If a concern about the welfare of a Vulnerable Person is brought to the Company's attention, it will take appropriate action to address that concern in accordance with this Policy; as appropriate in accordance with local authority policies and procedures; and, where required, in partnership with other local agencies.
- respect and promote the rights, dignity, wishes and feelings of Vulnerable Persons;
- establish and maintain an ethos where Vulnerable Persons feel welcome and familiar with their environment and are informed of personal arrangement such as the location of toilets and dressing rooms, and emergency arrangements such as the location of fire exits, meeting points etc. and Health and Safety considerations such as dangerous equipment, first aid provision etc;
- seek to protect Vulnerable Persons from abuse by providing a safe environment when they use Company premises;

- recruit and supervise Responsible Persons in accordance with this Policy;
- promote and adopt the best practice set out in this Policy through dissemination of the Policy to Responsible Persons and through training activities;
- inform each Vulnerable Person who the appropriate person or people is / are to speak to if they have any questions, problems or concerns;
- ensure that all Vulnerable Persons have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The Company is committed to anti-discriminatory practice and explicitly recognises the additional needs of children from minority ethnic groups and disabled people and the barriers they may face, especially around communication;
- always work in an open environment (e.g. avoiding private or unobserved situations and unnecessary physical contact with Vulnerable Persons) and involve/allow Carers wherever possible, to take responsibility for the Vulnerable Person;
- recognise the individual needs of the Vulnerable Person, e.g. recognising when a Vulnerable Person may be tired and may need a break;
- ensure that Vulnerable Persons are supervised appropriately;
- ensure that all Chaperones are registered with the local authority in which they reside and have an enhanced Disclosure and Barring Service (DBS) check;
- ensure all Company Personnel coming into close contact with a Vulnerable Person are DBS checked where that is required by law;
- ensure that all Company Personnel who do not necessarily have close contact with Vulnerable Persons but who are assisting in a production are aware of their conduct around Vulnerable Persons;
- ensure that Responsible Persons seek to achieve a balance between artistic and / or educational outcomes and the social, emotional, intellectual and physical needs of Vulnerable Persons;
- promote this Policy's guidelines, procedures, aims and objectives to external stakeholders, individuals, groups, contractors and organisations who use the Company's facilities and / or have direct access to Vulnerable Persons on its premises by providing a copy of this Policy upon request;
- implement effective procedures for recording and responding to incidents, complaints and alleged or suspected incidents of abuse; and will
- take seriously and respond swiftly and appropriately to suspicions and / or allegations of harm, poor practice and / or abuse in accordance with the Company's Discipline, Grievance, Equality and / or Public Interest Disclosure (Whistleblowing) policies.

The Company will adhere to the relevant legislation when working with Vulnerable Persons as outlined in the following documents:-

- The Children Act 1989
- The Public Interest Disclosure Act 1998
- The Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006

- The Equality Act 2010
- The Children (Performances and Activities) (England) Regulations 2014
- The Care Act 2014
- Working Together to Safeguard Children 2015
- Care and support statutory guidance 2017.

## 5. LINES OF RESPONSIBILITY

The Company's Lead Safeguarding Officer (LSO) is the Operations Director of HQ Theatres & Hospitality Limited and is responsible for co-ordinating the work of Safeguarding Officers and Responsible Persons; supporting Theatre / Venue Directors in their management of Safeguarding Officers / Deputy SOs in line with this Policy; and passing on any relevant disclosures. He / she must be notified without delay of any actual or alleged incident involving a Vulnerable Person. He / she can receive reports of safeguarding issues from anyone in the absence of a report being made to a Safeguarding Officer. He / she is also responsible for the review of this Policy and its effective implementation by the Company.

The Directors of HQ Theatres & Hospitality Limited, and the Directors of HQT Trust, are responsible for approving this Policy.

The Chief Executive of HQ Theatres & Hospitality Limited is responsible to the Board for arrangements to ensure that this Policy is kept up-to-date, and is followed in all Company locations and situations.

Venue Directors or Theatre Directors are the managers of each theatre / entertainment venue and are responsible for appointing and managing an individual to act as Safeguarding Officer (SO) and, if appropriate, a second individual to act as Deputy Safeguarding Officer (DSO) for his / her venue. Theatre Directors and Venue Directors are responsible for the performance of the SO / Deputy SO, and for the effective operation of this Policy in the venue / location for which they are responsible, ensuring their venue's SO and DSO receive the appropriate information, guidance and training necessary for him / her to undertake his / her SO / DSO role and responsibilities. These are also the responsibilities under this Policy of the senior managers of the Company's non-theatre / entertainment operations.

Safeguarding Officers (SOs) and Deputy SOs (DSOs) are responsible in their own venues for advising Responsible Persons and External Contractors / Partners on all matters pertaining to safeguarding and protection in connection with activities taking place on Company premises or under Company auspices. SOs are responsible for arranging and / or leading safeguarding training to Responsible Persons. SOs, in collaboration with venue Administrators, are responsible for keeping up-to-date and readily available to all staff members at their venues the relevant contact details of emergency, local authority and social services personnel. SOs will raise with their Theatre Directors any matters or concerns relating to the practice of safeguarding. A staff member's SO status will be confirmed in his / her Job Description or separately in writing. If a concern about suspected abuse is reported, the SO or his / her deputy will execute his / her responsibilities as set out in Appendices 1a and 1b.

Each Venue has an Administrator or Administration Manager who is responsible for the venue administration, including information sharing. Venue Administrators are responsible for ensuring his / her work location staff structure chart and contact list is kept up to date with the name, job title, phone number and email address of their work location's SO and, if applicable, Deputy SO.

Managers, including Line Managers and Creative Learning Managers are responsible for ensuring that all Responsible Persons at their work location are aware of this Policy, and that it is implemented in accordance with the information and guidelines set out within it. Managers must also ensure that any External Partners / Contractors with whom Responsible Persons engage on Company business, and with whom Vulnerable Persons will come into contact, are aware of and understand their obligation to comply with this Policy.

Responsible Persons are responsible for reporting any concerns to their venue's SO or Deputy SO.

Chaperones are responsible for the safety and welfare of the Vulnerable Persons to whom they have been assigned, and for fulfilling the conditions of their Chaperone Licence and/or the Body of Persons Approval (BOPA) certificate, as set out in Section 6 of this Policy. Chaperones will also adhere to The Children (Performance and Activities) (England) Regulations 2014.

A Carer can be responsible solely for the Vulnerable Person in his / her care, unless he / she is a registered Chaperone with wider responsibilities for Vulnerable Persons.

External official safeguarding agencies and organisations are responsible for determining whether or not abuse has taken place and for taking preventative action and/or investigation and / or prosecution, if appropriate.

## 6. RECRUITMENT

Safe recruitment and selection practice is vital in safeguarding and protecting Vulnerable Persons. The Company recognises and takes seriously its responsibility to adopt practice which minimises risk to Vulnerable Persons by ensuring that pre-employment checks and measures are carried out to deter, reject or identify people who might abuse, or who are unsuitable to work with Vulnerable Persons.

The Disclosure and Barring Service (DBS) exists to help organisations identify people who are unsuitable for certain types of work, especially work involving access to, or contact with vulnerable groups, including children, by issuing DBS certificates of any criminal, police or similar records. The DBS process checks applicant names against both the Barred Children's and Barred Adults' Lists. There are two levels of check available: Standard and Enhanced. Enhanced checks can be made with or without a Children's and/or Adults' Barred List check.

Recruiting managers will adhere to current legislation when recruiting and inducting Responsible Persons, irrespective of whether the recruitment is of a Company staff member, volunteer, freelance contractor or performer. The recruitment of Responsible Persons will include a DBS check where the post meets the legal criteria for such a check.

If, following his / her involvement while a Vulnerable Person in a youth project or other Company activity, an individual is subsequently employed by the Company as a Responsible Person, the individual will be made aware by the employing manager that, in his / her role as an employee, he/she is in a "relationship of trust" with Vulnerable Persons, some of whom may previously have been his / her colleagues and peers; and that his / her working relationship with such Vulnerable Persons may need to change so as not to breach that trust. This will be made clear during the Vulnerable Person's New Starter Induction process, and the Company requires that the

employing manager satisfies him / herself that the individual has understood the scope and implications of the “relationship of trust”.

## **7. TRAINING AND AWARENESS**

All Responsible Persons will be appropriately trained to recognise and understand possible signs of abuse and must understand the steps they need to take to provide reasonable, appropriate protection from abuse and neglect.

- Venue / Theatre Directors, SOs, Deputy SOs and Creative Learning Managers (if he/she is not a SO) will undertake safeguarding and protection training.
- Prior to Summer Youth Projects (SYPs) and any other projects involving large numbers of Vulnerable Persons a meeting for Company SOs /DSOs will be arranged to facilitate training, discussion, information sharing and collaboration. Minutes will be taken and circulated to all relevant Company personnel. Additional SO meetings will be arranged as necessary and if required.
- Responsible Persons and Company Personnel will be made aware of this Policy and its contents during their induction and through the dissemination of Policy updates.
- External Partners / Contractors working with Vulnerable Persons will be provided with a copy of this Policy as part of their contractual arrangement with the Company.

## **8. EXTERNAL PARTNERS AND CONTRACTORS**

External Partners and Contractors who hire, use or are engaged to perform in any of the Company’s venues and are working with Vulnerable Persons may so hire, use or perform on the Company’s premises on the strict condition that they have their own written Safeguarding Policy and procedures. The Company reserves the right to request sight of such documentation at any point during the External Partner’s / Contractor’s involvement with the Company. If the External Partner’s / Contractor’s own policy is considered by the Company to be inadequate, then this Policy will supersede the External Partner’s / Contractor’s policy and will be binding on the External Partner / Contractor.

## **9. REVIEW**

This Policy will be reviewed every two years under the supervision of the LSO employed by the Company, or earlier in one or more of the following circumstances:

- if there is a major change or restructure within the Company;
- if a Vulnerable Person’s safety is compromised or a protection-related incident occurs; or
- if there is a change in legislation.

Responsible Persons will be informed of all amendments to this Policy and appendices.

## 10. DATA PROTECTION AND CONFIDENTIALITY

### 10.1 Responsibilities and procedures

Responsible Persons will handle and manage personal data pertaining to Vulnerable Persons and those who work with them in accordance with the Company's Data Protection Policy.

Personal information about Vulnerable Persons and their families will usually remain confidential and will not be disclosed to a third party without the consent of the subject. However, sometimes it is only when information from several sources has been shared and combined that it becomes clear a Vulnerable Person is at risk. The law allows for the disclosure of confidential information where it is in the public interest to safeguard a Vulnerable Person.

The Company will only make a decision to disclose confidential information exclusively on a case-by-case basis, taking into account the particular facts of any specific case. Where disclosure is judged by senior Company personnel, including the Company's Data Protection Officer, to be appropriate, the sharing of personal information will be limited to those individuals who need to know in order to decide what appropriate action, if any, needs to be taken.

Requests for personal information from public bodies such as the police or social services will be considered if they are made in writing, setting out the reason for the personal information disclosure request.

As a necessary part of its business operations the Company has a presence on a number of social networking websites. The Company recognises the potential risks to Vulnerable Persons who engage in social networking. On-line activity using Company equipment or in connection with Company business is monitored by the Company's ICT Department.

### 10.2 Use of photographic and filming equipment during public performances, workshops, rehearsals and other events

Equipment intended solely for taking photographs or recording film or video is not allowed on Company premises unless the operator has been given prior permission by the Venue Director / Theatre Director or Marketing Manager.

Professional photographers and/or filming or video operators who wish to record an event in which a Vulnerable Person is participating will be required to seek prior permission by submitting a written request to the Venue / Theatre Director or Marketing Manager at least five working days before the event or, in special circumstances approved by the Venue / Theatre Director or Marketing Manager, as soon as possible before the event, stating the reason(s) for the request and explaining for what purpose the photographs or film will be used. Applicants will be required to provide identification which will be copied for event file records.

The Company will seek prior permission from the Carer of a Vulnerable Person if the Company wishes to use photographic or film material for marketing, promotion or web-site purposes. Unless specific permission has been given, the Vulnerable Person's name will not appear alongside the photograph or video.

Carers of Vulnerable Persons taking part in a performance, workshop, rehearsal or other event will be informed by the Company in advance of the event taking place if the event is being photographed or filmed.

Visitors attending a public performance or event will generally be notified via the venue's public address system prior to the event commencing that the use of photographic / film / video recording equipment is not allowed, though this notification cannot be guaranteed.

Photographic and film records will be stored in accordance with the Company's Data Protection Policy and will not be shared with a third party unless explicit permission has been sought and given as set out above.

## **11. SUSPECTED, ALLEGED OR ACTUAL ABUSE**

As part of this Safeguarding Policy, the Company adopts and promotes the principles and guidance set out in Appendices 1 to 3 attached to this Policy relating to suspected, alleged or actual abuse.

Though rare, false allegations of abuse do occur. Notwithstanding this, disclosures, suspicions and allegations will always be taken seriously and acted upon swiftly and appropriately in accordance with the Company's Safeguarding, Discipline, Grievance, Equality and / or Public Interest Disclosure (Whistleblowing) policies.

It is not the responsibility of any Company Personnel to decide whether or not a vulnerable person is being or has been abused. There is a responsibility to act on concerns to protect Vulnerable Persons in order that external safeguarding agencies can then make enquiries and take any necessary action to protection that Vulnerable Person.

## **12. SUSPENSION**

If an allegation of abuse is made against a staff member, the Venue Director or Theatre Director or, in his / her absence the Company's Chief Executive or its Operations Director, in consultation with the Company's Human Resources Manager, will decide whether the staff member should be temporarily suspended from duty, pending further investigation into the matter. Such a decision and any subsequent actions will be implemented in accordance with guidelines set out in the Company's Discipline Policy and investigation guidance.

The welfare of the Vulnerable Person will remain of paramount importance throughout any internal enquiry and investigation.

The Company will provide support and advice to the staff member who is the subject of the investigation.

## **13. CODE OF CONDUCT**

The Standards of Safeguarding which through this Policy the Company seeks to achieve, and expects its Personnel to achieve, will be the product of all Responsible Persons taking a number of actions

("Do...") and avoiding others ("Do Not ..."). The Company requires that all Responsible Persons observe all of the procedures in the Code of Conduct listed below.

**Do:**

- Treat all Vulnerable Persons with dignity and respect.
- Make the welfare of Vulnerable Persons a top priority.
- Provide an example of good conduct for others to follow.
- Work in an open environment, avoiding private or unobserved situations.
- Encourage open and honest discussion and collaboration. Do not encourage "keeping a secret".
- Build healthy, balanced relationships based on mutual trust.
- Give enthusiastic and constructive feedback, rather than criticism without the encouragement to improve.
- Empower Vulnerable Persons to share in decision-making processes.
- Recognise and understand the development needs and learning capacity of Vulnerable Persons.
- Ensure that wherever possible there is more than one adult present during activities with Vulnerable Persons. Where this is not possible, invite the Vulnerable Person to bring a friend with him or her, or move into the view of others, or leave the door open.
- Wherever possible, involve Carers in safeguarding Vulnerable Persons on Company premises, for example, in dressing rooms.
- Although not a legal requirement, try to ensure supervision of Vulnerable Persons is undertaken by two people.
- Where a private conversation with a Vulnerable Person is absolutely necessary, inform another Responsible Person of your whereabouts and indicate how long you expect to be.
- Give consideration to any contact you may have with a Vulnerable Person in a social setting; be aware of your behaviour and try and move away at the earliest opportunity.
- Respect a Vulnerable Person's right to personal privacy.
- Remember that another person might interpret your actions differently from how they are intended.
- Watch out for your colleagues - are they being drawn into situations which could be misinterpreted?
- Maintain a safe and appropriate distance from Vulnerable Persons who are performing or engaged in Company activities. Avoid physical contact with Vulnerable Persons wherever possible, unless such contact is justified by the immediate circumstances.
- Give special consideration to any situation which requires you to discuss a sensitive matter with a Vulnerable Person.
- Undertake your safeguarding duties and obligations in accordance with the Company's Policy and this Code of Conduct.
- Prior to the performance or activity taking place, seek written parental or carer consent to act if it is necessary to administer first aid and/or other medical treatment. Except in the very unlikely event of a medical emergency, administration of first aid and/or other medical treatment will not be undertaken without having first sought and obtained such consent.

- Ensure records are kept of any injury that occurs and/or any treatment which is administered by a Responsible Person during a performance or activity, along with information relating to an injury or concern that existed prior to the performance or activity.
- Ask the Carer to provide information regarding any prescribed medicines being taken by, or administered to the Vulnerable Person and/or any injuries which he/she has sustained prior to his/her participation or engagement in a Company performance or activity.
- Challenge unacceptable behaviour and language.
- Report all allegations and suspicions of abuse as set out in Appendix 1a and 1b.
- Give guidance and support where required and as appropriate.

**Do not:**

- Believe “it could never happen to me.”
- Share a dressing room with a Vulnerable Person or invite him/her into a private office unless you are a Chaperone.
- Engage in inappropriate physical, verbal or electronic contact with Vulnerable Persons.
- Be perceived to, or have a “favourite” within a group of Vulnerable Persons.
- Jump to conclusions without first checking the facts.
- Exaggerate or trivialise actual or alleged safeguarding matters.
- Offer a lift to a Vulnerable Person outside of agreed activities and permissions.
- Take a Vulnerable Person to your home.
- Use physical punishment or contact or any action which involves unnecessarily confining a Vulnerable Person.
- Arrange meetings with a Vulnerable Person outside work.
- Accept ‘Friend’ requests on social networking sites from Vulnerable Persons you have met during the course of undertaking work duties, or with whom you conduct a professional relationship.
- Buy goods or services from Vulnerable Persons.
- Accept money or gifts from Vulnerable Persons without first declaring it to your manager.
- Give money or personal gifts to Vulnerable Persons, other than in exceptional circumstances such as charity sponsorship. (Congratulations cards, etc. are acceptable.)
- Borrow money from Vulnerable Persons.
- Assume it is safe to adopt common sense when policy or practice suggests another, more prudent approach.

The Company reserves the right to amend this Policy at any time. This Policy, or any subsequently amended version of this Policy, does not form part of a staff member’s Contract of Employment with the Company, even if it is referred to in the Contract of Employment and / or vice versa. Changes to this Policy will be posted on the Company’s Intranet, for the information of all staff members.

**Abuse: reporting and referral**

As part of its general duty of care, the Company has established a formal procedure for the referral if appropriate to the relevant authorities of suspected or alleged abuse of Vulnerable Persons. It is not the responsibility of those implementing this Policy to decide whether or not a Vulnerable Person is, or has been abused. This is the responsibility of the relevant authorities. These may include the local authority's Children's Services or Adult Services, and / or the police. Local Authority Social Services Departments have a statutory duty to ensure the welfare of Vulnerable Persons and to investigate any matters reported to them.

Referral in the context of suspected or reported abuse is a very serious matter. If a Responsible Person reasonably suspects that a Vulnerable Person is, or has been, subject to abuse of any kind outside the Company's premises, when the Vulnerable Person was not engaged in Company activity, the procedure set out on the flow chart in Appendix 1a must be followed for the reporting of that abuse to relevant authorities. Responsible Persons reporting possible abuse may be asked to provide a formal statement to assist with subsequent external investigations.

The flow chart "Abuse: managing a reported concern regarding the conduct of a staff member" (Appendix 1b) sets out the procedure to be followed if the abuse is suspected or reported as having been committed by a staff member.

Where possible, a referral to Social Services will be made only after consultation with the Carer of the Vulnerable Person because certain indicators, such as being withdrawn, may occur as a result of, for example, bereavement, in which case a referral for suspected abuse would be inappropriate.

The Company requires that all information and actions pertaining to the disclosure are recorded on a Safeguarding Incident Form (Appendix 2).

In accordance with the Company's Public Interest Disclosure (Whistleblowing) Policy, the Company will fully support and protect anyone who, in good faith, reports a concern that an individual is, or may be abusing a Vulnerable Person.

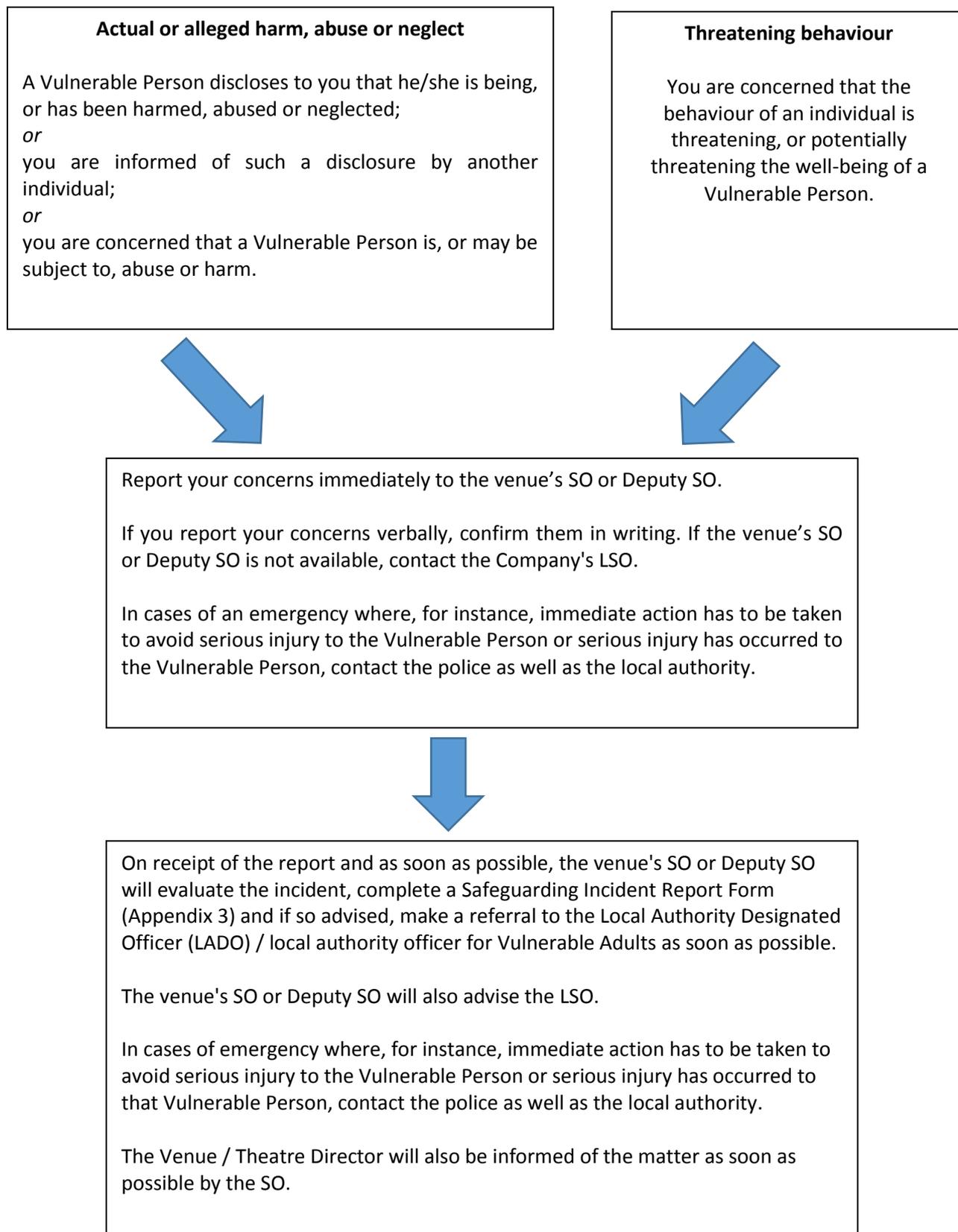
**Historic Abuse Allegations**

It could occur that the Company, or one of its staff members, receives an allegation of abuse against an individual who has ceased his / her involvement with the Company, and where the Vulnerable Person who is alleged to have been abused may also have ceased his / her involvement with the Company.

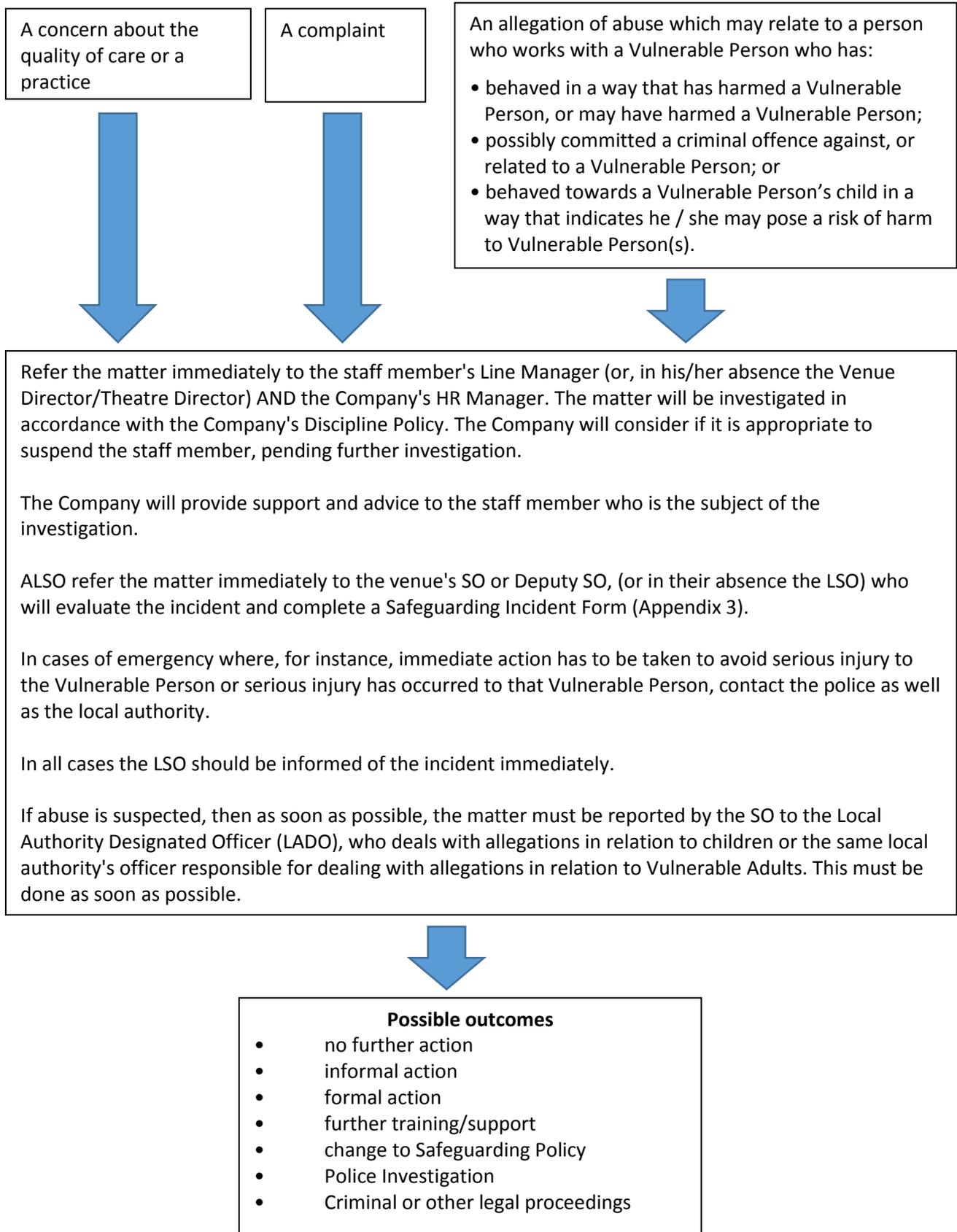
The fact that the Company no longer employs a person who is accused of abuse, or the fact that his / her involvement with the Company has ceased, is not a reason for failing to act in accordance with this Policy. The Company may be under a legal duty under the Safeguarding Vulnerable Groups Act 2006 (or any legislation preceding that Act) to report the matter to the authorities.

Consequently, the procedures outlined in Appendices 1a and 1b should still be implemented. Even if the Company is not obliged to report the matter under the Safeguarding Vulnerable Groups Act 2006 or any other legislation, it should still report the matter to the police.

**Abuse: responding to allegations**



**Abuse: managing a reported concern regarding the conduct of a staff member**



**Safeguarding Incident Report Form**

**PART 1**

**To be completed by the Responsible Person reporting the incident**

Please ensure you include the following information:

- the nature of the allegation;
- a description of any visible bruising and/ or other injuries;
- the Vulnerable Person’s account of what has happened and how any bruising or other injuries occurred, if it can be given;
- the name(s) and contact details of any witnesses;
- time(s), date(s), place(s) and other relevant information; and
- if applicable, a clear distinction between fact, opinion and hearsay.

**Your details**

Full name:	
Job title or position:	
Tel. No:	Email:

**Vulnerable Person’s personal details**

Full name:	
Address:	
Tel. No:	Date of birth:
Carer’s full name:	
Carer’s address:	

**Details of incident**

Date of incident:	Time of incident:
Summary of incident:	

Further observations:
(If applicable) what the Vulnerable Person said to you (his/her own interpretation in his/her own words) and what you said in response. <i>Continue on a separate sheet if necessary.</i>
Action taken:
Further action required:
Name, address and contact details of witness (if applicable):
Signature: Print name: Date:

## PART 2

To be completed by the Safeguarding Officer or Deputy Safeguarding Officer who received notification of the incident.

### Your details

Full name:	
Job title or position:	
Tel. No:	Email:

### External agency notification

Date of notification:		Time of notification:	
<b>POLICE</b>  Yes / No	If yes – which department:  Name and contact number:  Details of advice received:		
<b>SOCIAL SERVICES</b>  Yes / No  <i>A copy of both forms must be forwarded to Social Services immediately after a telephone report has been made.</i>	If yes – which department:  Name and contact number:  Details of advice received:		
<b>OTHER (e.g. NSPCC)</b>  Yes / No	If yes – which organisation :  Name and contact number:  Details of advice received:		

Action taken:

Further action required:

Signature:

Print name:

Date:

### Licensing and Exemptions/Body of Persons Approval (BOPA)

Section 37 of the Children and Young Persons Act 1963 restricts persons under 16 taking part in public performances. This includes children who have attained age 16 during the academic year, i.e. are still of compulsory school age.

The law states that that any such person must be licensed if he / she takes part in any performance which :-

- takes place on licensed premises;
- for which there is a charge made for entry;
- is broadcast or may be broadcast;
- for which the child receives a fee for the performance and/or
- for which the child needs to be absent from school.

The rules for licensing contained in the Children (Performances and Activities) (England) Regulations 2014 are detailed. The following provides a brief summary of the way in which the law works, but it is not a substitute for understanding the law, which is complex and strict.

The person in charge of the event must apply to the child's local council for a child performance licence.

The applicant may be the Company, but in the case of events or shows taking place on Company premises which are under the control of hirers (including amateur societies), dance schools, and educational or community organisations; or for professional productions presented by visiting companies, featuring or involving children on stage, the application must be made by the hirer or visiting company responsible for the event. If the hirer or visiting company responsible for the event fails to secure a BOPA certificate or child performance licences, the Company cannot permit the Vulnerable Persons involved to be present on Company premises.

If the child is not paid or does not require any absence from school, the local authority can issue a Body of Persons Approval (BOPA) certificate which covers the show and not the child.

A BOPA is a mechanism that can be used to reduce the strict licensing requirements for project-based work the Company undertakes and in which Vulnerable Persons will participate. A BOPA certificate does not reduce chaperoning responsibilities or the obligation to adhere to the procedures set out in this Policy.

If a child is licensed or a BOPA certificate has been issued, then licensed chaperones will be required for the show or event. Government regulations state that the maximum number of children a chaperone may supervise is twelve. However, after taking into account the ages and gender of the children, the local authority (which issues the licences) may consider that the chaperone can only effectively look after a smaller number.

Performances which are non-profit making, for example, Easter and Summer Youth Projects, may be exempt from the licensing of children who are individually participating. Exemption is at the discretion of the local authority which issues a BOPA certificate.

All terms contained in the BOPA certificate will be fully complied with. In particular, the Company will adhere to the appropriate number of licensed chaperones, taking into account the age, gender and location

of the Vulnerable Persons taking part in an activity or performance under a BOPA certificate. In all circumstances:

- Chaperones will be informed of all work location arrangements, provisions and procedures in respect of fire safety, emergency evacuation and first aid;
- Chaperones will ensure that accidents and incidents are reported in accordance with the Company's Accident and Incident Reporting Procedures;
- where it is a BOPA certificate or licensing regulation requirement, all Vulnerable Persons will be chaperoned by a licensed Chaperone;
- the venue will request and obtain copies of Chaperone licenses; and
- a Chaperone will only be assigned chaperone duties and will not be assigned any other duties or responsibilities which prevent him/her from carrying out his/her Chaperone responsibilities.