



Waterloo
Community
Theatre

**SAFEGUARDING POLICY
AND
OPERATIONAL PROCEDURES**

Updated February 2020

1. POLICY REVIEW

WCT's Safeguarding Policy will be updated, reviewed and adopted annually. In addition to the annual review the policy should be amended as required by changes in legislation or best practice.

Policy updated by Designated Safeguarding Lead Officer October 2019.
Policy reviewed and approved by the Company Directors October 2019.
Policy signed off and adopted by WCT in October 2019.

2. POLICY STATEMENT

WCT has a duty of care to safeguard from harm all children and young people with whom it interacts. We do this by:

- Recognising that all children have the right to freedom from abuse and harm
- Ensuring that all our staff and volunteers are carefully selected and vetted, have had relevant qualifications and experience, and accept responsibility for helping to prevent the abuse of children in their care.
- Responding quickly and appropriately to all suspicions or allegations of abuse
- Providing parents/carers, children/young people with the opportunity to voice any concerns they may have
- Appointing a Named Safeguarding Lead Officer (DSL, DSO) who takes specific responsibility for children's and young people's protection, safety and wellbeing
- Reviewing the effectiveness of the company's Protection Policy and Procedures
- Working with external agencies to ensure, as far as is possible, that children and young people are protected
- Not tolerating bullying. Incidents of bullying will be investigated and treated seriously. Action will be taken to stop the bullying.

This policy details the legal requirements, organisational procedures and best practice as applicable to all staff.

This policy applies to all WCT staff, including those who work on a volunteer and freelance basis as well as WCT's Directors.

3. ROLES AND RESPONSIBILITIES

Designated staff are as follows:

Designated Safeguarding Lead Offer (DSL, DSO)	Anna Glarin
Designated Safeguarding Ambassador (DSA)	Mark Johnson

DSO leads upon policy development and reporting, including:

- Reviewing and updating safeguarding policy on an annual basis or when necessary
- Leading upon contact with Social Services in the event that a child is at risk of harm
- Managing complaints about poor practice and allegations against staff/volunteers
- Referring relevant issues of safeguarding to the Directors for consideration
- Collecting monitoring data on all safeguarding for consideration by the Directors
- Promoting safeguarding across the organisation
- Ensuring safer recruitment procedures
- Providing guidance to staff concerned about a child protection issue
- Ensuring the policy is up to date and fit for purpose
- Ensuring that safeguarding procedures are fully implemented and followed by all staff
- Reviewing and responding to safeguarding concern incident forms

DSA and DSO jointly leads upon implementation and training, including:

- Acting as a 'front-line' point of contact for persons concerned about a child's welfare
- Modelling best safeguarding practice amongst staff/volunteers/participants
- Contributing to the review and update of the safeguarding policy and procedures
- Keeping accurate records of concerns about children and actions taken

4. RECRUITMENT & SELECTION OF STAFF & VOLUNTEERS

WCT recognises that safe recruitment and selection practice is vital on safeguarding and protecting children. WCT has adopted the Lambeth Safeguarding Children Board Safer Recruitment Framework. In accordance with this, WCT will ensure that

- Safeguarding and safer recruitment statement included in all staff job adverts
- Safeguarding and safer recruitment statement included in all staff job descriptions
- Interviewers question gaps in employment history

- Enhanced Disclosure and Barring Service (DBS) are carried for relevant roles (see section 5)
- References are taken and contacted before offering the role

JOB DESCRIPTIONS & ADVERTISING

The below statement should be included in all job descriptions and advertising for permanent or fixed term staff and volunteers:

WCT is committed to safeguarding all children and young people that we work with and we expect all staff and volunteers to share this commitment. WCT follows Lambeth Council's Safeguarding Children Board Safer Recruitment practices in the recruitment of its staff.

INTERVIEWS FOR CONTRACTED STAFF

Shortlisted candidates will be interviewed by a panel of at least one Director and one staff member. WCT will ensure that at least one member of any interview panel has attended Safer Recruitment Training. Interview questions help to assess applicant's suitability to work with children and adults at risk by finding out as much information about the following:

- The applicant's background,
- Their motivation, character and temperament and
- Their attitudes, opinions and values.

Current staff who have undergone Safer Recruitment Training
Anna Glarin – Co-Artistic Director and Secretary

REFERENCES

For Directors and volunteers at least one reference will be obtained which should be from the most recent employer or a more relevant employer if they have worked with children and young people in the last five years. If a Director has no experience of working with children and young people, then the most recent employer should be able to assert Directors' integrity of character.

For regular sessional staff or permanent staff a minimum of two referees will be obtained, one of which should be the applicant's current or most recent employer and both should be able to testify to the candidate's suitability for the role and whether there is any known reason why the applicant should not work with vulnerable groups. Where a person has worked with children in the past but not currently, it is important to seek a reference from the employer who most recently employed the person to work with children, young people or vulnerable adults.

5. STAFF TRAINING

Staff training is an important aspect of safeguarding. WCT access training provided by London Youth and Lambeth Council. Both current Directors also work with children, young people and vulnerable adults in other jobs and access regular training through their workplace.

Any previous member of WCT who comes to sessions to volunteer will be treated as an adult volunteer and will need to have completed the volunteer level of training.

Lambeth Safeguarding and Child Protection Board Level	Detail	WCT Applicable Staff	Training Required
1	Staff/volunteers with limited contact with young people. These staff have responsibility to contribute to promote the welfare of children but do not have specific safeguarding organisational responsibilities.	Project assistants, volunteers working with young people with more than one session	Safeguarding Introduction Course (online Level 1)
2/3	Staff who work regularly and predominantly with young people. These staff have professional and organisational responsibilities for safeguarding and promoting young people's welfare. They also have substantial degree of personal responsibility and autonomy to act on children and young people's welfare concerns.	All permanent and sessional staff.	Level 3 Safeguarding course (one day)
4	Professional advisors, named and nominated designated officers for child protection and their deputies in all services and agencies.	Co-Artistic Directors and DSO	Level 3 (one day course) + Designated Safeguarding Lead (Level 5) & Responsibilities

Note: All persons in group 2/3 are required to attend Safeguarding and Child Protection Refresher/Update (1/2 day) course to refresh their knowledge every two years. All persons in group 4 are required to complete a refresher DSL Level 5 training every two years.

WCT will keep a record of all Safeguarding training undertaken by staff and will ensure that they renew their training when necessary. WCT will support staff to take responsibility for their continuing professional development and to seek further training as and when required.

6. IDENTIFYING & RESPONDING TO CONCERNS ABOUT A CHILD/YOUNG PERSON

At times WCT staff may have to respond to concerns about the welfare of children and young people. This could relate to the actual or alleged harm of a child. Alternatively, a child or young person we are working with may disclose abuse directly to you. This section provides information and guidelines on our procedures in these situations.

IDENTIFYING TYPES & INDICATORS OF ABUSE

In order to effectively protect children and young people against harm all staff should be familiar with the various types and key signs of abuse. The Government's Working Together to Safeguard Children (2018) details four key types of abuse: Physical; Sexual; Emotional; and Neglect. All permanent and sessional staff are required to acquaint themselves with 'Definitions and Signs of Abuse' (Appendix 4).

HEARING A DISCLOSURE

If a child says or indicated that he or she is being abused, or information is obtained which gives concern that a child is being abused, all staff should follow the guidance detailed in the 'Staff Code of Conduct' (Appendix 3).

REPORTING ALLEGATIONS, SUSPICIONS OR CONCERNS

It is the responsibility of all staff to act on concerns to protect children in order that appropriate agencies can then make enquiries and take any necessary action to protect the child. Staff who have concerns should report their concern to the relevant staff, as detailed in the 'Staff Code of Conduct' (Appendix 3) which is issued to all staff. All concerns will be considered, and a decision reached as to whether the concern reaches the threshold which required it to be referred to Social Services.

MAKING A REFERRAL TO SOCIAL SERVICES

If a concern is made to raise a concern with Social Services it will be the responsibility of DSO to formally report this concern. If, for any reason, the DSO is unable to lead on this process then DSA will make the referral. Referrals should be made to:

Lambeth Children Social Care:

Referral and Advice Team	020 79265555
Emergency Duty Team	020 79265555

A phone call must also be followed up with a multiagency referral form, available on Lambeth's website, and emailed to helpandprotection@lambeth.gov.uk WCT will make all referrals within 24 hours of a serious concern of disclosure coming to light. When a referral is made, WCT will record the name and role of the children's services member of staff or police officer the concerns were passed to, together with the time and date of the call/referral.

If a concern is allayed and a decision is made not to make a referral then WCT will still be required to record details of the concern and details as to why a referral was not made. This information may become relevant later on if further concerns emerge.

All details will be saved on a restricted access file and all names will be anonymised and initials used. The folder can be accessed by the DSO and DSA.

7. INCIDENT REPORTING

The reporting of all incident and disclosure is vital to protecting children and young people. The nature of reporting will vary according to the nature of the incident, procedure etc.

Procedures for incident reporting, which detail when issues/concerns should be escalated and to whom, are detailed in Appendix 7.

In all instances, if a concern is deemed URGENT then the DSO or the DSA should immediately liaise directly with Social Services (or Police, as required) and should keep each other informed, rather than risk a delay by consulting with other parties.

Staff will also record an incident in a young person's chronology on file to ensure there is an overview of all incidents which have occurred for any particular young person and levels of escalation.

8. ALLEGATIONS OF MISCONDUCT OR ABUSE BY STAFF

In the event of allegations being made against an employee (staff or voluntary), WCT has a dual responsibility in respect of both the child/young person and employee. The same person must not have responsibility for dealing with the child/young person welfare issues and the staff employment issues. Two separate procedures must be followed:

- In respect of the child/young person the DSO or the DSA will lead the process related to the child/young person;

- In respect of the staff member against whom the allegation is made the DSO will lead the process related to the staff member.

With regards to the child, the process in section 7 will be followed. With regards to the staff member against whom the allegation is made, the below process will be followed:

- WCT will make formal contact with Lambeth Council Local Authority Designated Officer (LADO) who is responsible for providing instructions in the event of an allegation of abuse or suspicious behaviour made against a staff member.
- WCT is legally required to alert the LADO to all cases in which it is alleged that a person who works with children has: a) behaved in a way that has harmed, or may have harmed, a child/children; b) possibly committed a criminal offence against a child/children; c) behaved towards a child in a way that indicated s/he is unsuitable for such work.
- The LADO will instruct WCT on procedure and what information may be shared with the person who is the subject of an allegation. WCT and LADO will decide, in consultation with the Police and/or any other relevant agencies, what may be shared in situations that may possibly lead to a criminal investigation.
- Subject to advice from the LADO, and to any consequent restrictions on the information that can be shared, WCT will, as soon as possible, inform the accused person about the nature of the allegation and outcome of any investigation and the implications for any disciplinary or related process.

In all instances WCT will seek to ensure that any staff member is treated fairly and honestly and that they are supported to understand the concerns expressed and processes involved. They will be kept informed of the progress of any investigation and the implications for any disciplinary or related process.

Contact details for Lambeth's LADO are provided in Appendix 1.

A flowchart for allegations against staff is provided in Appendix 6.

9. COMMUNICATION WITH YOUNG PEOPLE

COMMUNICATION VIA PHONE

All contact with young people outside of sessions is to be carried out by the Directors only. Staff should not use their personal mobile phone for this purpose. All company mobile phones are to be pin locked so that data is not accessible by others. We recognise that at times, members might disclose information to staff members via texts, calls or other media (e.g. social media).

USE OF COMPANY PHONES OUTSIDE OF WORK HOURS

Staff members with access to company phones should turn their work phones off when they are not working for WCT. Status messages on WhatsApp and other instant messaging services and Voicemail messages should state that they phone will only be turned on during working hours. We will inform company members on leaflets/schedules that the company phones are switched off outside of work time.

Staff members may need to use their phones proactively to communicate with members outside of normal working times (e.g. on a Sunday evening to inform the company of last minute changes of venue, times or to remind them to bring something with them the next day/session), but they are encouraged to only use the phone to send messages, rather than reply to messages.

RECEIVING A DISCLOSURE VIA MOBILE PHONE

If a staff member receives a worrying message that they think may indicate that the young person communicating with them is at immediate risk during or outside of work hours, they should immediately refer it for action to an executive staff member (DSO/DSA), ideally speaking to them in person (if the disclosure takes place in working hours) or by phone. The DSO/DSA will follow the procedure below. If the staff member cannot get hold of the DSO/DSA, or a more senior member of staff, they should also follow this procedure:

- Check with the young person – What is happening? Where are you? The staff member should not attempt to solve the problem.
- Contact the young person's parent/guardian, or – if applicable – the social worker/key worker associated with that young person. If there is no response: alert the emergency services (in most cases this will be the police) by calling 999 and giving as much information as possible.
- Write up what happened in as much detail as possible.

DUTY OF CARE

WCT recognises that it has a duty of care to all staff members who may have to deal with difficult or upsetting disclosures from young people when not at work. In order to ensure this, we will:

- Set out clearly our expectations in terms of how staff members use their phones and protect staff members' private time.
- Follow best practice in how we manage disclosures.
- Review all incidents within the staff team and at Director level.
- Offer appropriate support and care for staff members who have to deal with disclosures.

COMMUNICATION VIA EMAIL

Staff will at times be required to email young people's personal email addresses. In such cases staff should only use a WCT email address and use clear language to avoid any misunderstanding on the part of the recipient. Staff members who have concerns regarding content of an email that they send or receive from a young person should consult the DSO or DSA for guidance.

COMMUNICATION VIA SOCIAL MEDIA

WCT recognises that social media can be a legitimate and effective way to communicate with young people. Current social media applications frequently used by members include WhatsApp, Twitter, Facebook, Snapchat, Instagram to name but a few. Contact with young people through such forums should only take place through organisational accounts. Current organisational accounts are as follows:

Application	Account Domain	Account Moderators
Twitter	https://twitter.com/WComTheatre	Anna Glarin & Mark Johnson
Instagram	https://www.instagram.com/waterloocommunitytheatre	Anna Glarin and Mark Johnson
Facebook	https://www.facebook.com/waterloocommunitytheatreCIC	Anna Glarin and Mark Johnson

It is important to note that WhatsApp and Instagram have become two of the main channels for communication with the young people. Staff should follow the same guidelines as the email communication; only use a WCT platform and use clear language to avoid misunderstandings.

STAFF SOCIAL MEDIA ACCOUNTS

Staff should not accept Facebook friend requests from any young person whom they know through WCT. Staff should not follow any young person whom they know through WCT on Instagram. WCT does not expect its staff to protect their personal Twitter and/or Instagram accounts (thereby making sure their tweets/posts are only visible to followers approved by the account holder). However, WCT does ask all staff to respect their association with the organisation when posting on social media. When a member leaves WCT and is over 18 years old it is up to the discretion of the staff member whether to accept requests or connect on social media.

10. LOST OR MISSING YOUNG PEOPLE

Below is the procedure for dealing with a lost or missing young person:

- If a young person cannot be found, the DSO must be notified immediately and told when and where the young person was last seen. Time is of the essence and prompt actions must be taken by all.
- Remaining young people should be left safe in the case of suitable staff whilst all other available staff conduct a thorough search if the area in which the activity is being delivered. If something is discovered, the DSO must be immediately informed.
- If the young person is not found within 30 minutes, the parents/carers and then the police must be called by the DSO. It should be remembered that it is better to ring the Police afterwards to say that the child has been found rather than delay and thus endanger the child/ The DSO will take further advice from the Police.
- If the young person is found then the DSO should be informed, they will inform parents, police and any other relevant authorities.
- An incident report should be completed and circulated to the DSO and DSA for information. The DSO should investigate how the incident occurred and will take appropriate action to ensure that similar events do not happen again.

11. DANGEROUS WEAPONS

It is understood that some young people may choose to carry a dangerous weapon such as a knife or gun as a perceived form of self-protection. However, it should be remembered that it is a crime to carry (or pretend to carry) a gun or knife, or any other object that may be intended to hurt someone.

If a young person is suspected of carrying a weapon they will be asked if this is the case. If a young person is found to be carrying or threatening to use a weapon the police will be informed. WCT will take advice from the Police regarding further action.

In the incident of a weapon being found CT will inform all members of the weapon and where it was found and will ask the responsible young person to make themselves known to WCT staff.

WHAT THE LAW SAYS

It is illegal to carry a knife in a public place, even if it belongs to someone else

It is illegal to carry a folding pocketknife if the edge of the blade exceeds 3 inches

It is illegal to carry a pocketknife if the blade can be locked

It is illegal to carry any knife, including folding knives, if there is intent to use it as a weapon, even if it belongs to someone else

The maximum sentence for possessing a knife in a public place without good excuse has been increased from two to four years for 16-17-year-olds and adults

It is illegal to keep any prohibited firearm, or to carry any firearm – including in imitation – in public, even if you are carrying it for someone else

The maximum sentence for unlawful possession of a prohibited firearm is ten years
The minimum sentence is three years for 16-17-year-olds and five years for adults
Police can and will search someone if they believe they are carrying a gun, knife or other weapon

12. INTERGENERATIONAL ACTIVITY WITH ADULTS

The aim of intergenerational work is to be together with people of different ages who would otherwise probably never meet. Keeping young and older people safe during intergenerational activity is achieved by using a combination of appropriate staff selection and training, a high enough ratio of supervisors (NSPCC guidance recommends one adult to every ten children) to people attending, forward planning, keen observation and common sense.

SUPERVISION

Interactions between groups of young people and older people should be supervised at all times by at least two experienced staff members and are best protected by ensuring that everything that happens is in the open. Supervisors should be able to see all areas of the room clearly. Where possible, adults and children should use separate toilets. Supervisors should be DBS checked.

PREPARING FOR GROUPS TO WORK TOGETHER

Groups of older and younger people should be well prepared before meeting and working with each other. Preparation might include discussion or activities to explore:

- What the project will be about, and what activities will be involved
- What will be expected of them
- A discussion of appropriate behaviour
- Physical contact boundaries
- Ageism awareness and stereotyping of older and young people
- Courtesy and appropriate language

VULNERABLE ADULTS AT RISK

A 'vulnerable adult at risk' is someone who is 18 years or over who may be in need of community care and who may find it difficult to protect themselves from abuse. This might be due to a mental or other disability, age or illness. If you are worried about an adult at risk or their wellbeing then you are required to report your concern to the DSO who will contact Lambeth Council's Adult Social Services:

Lambeth Online adult reporting form
www.lambeth.gov.uk/forms/raising-concerns-that-an-adult-may-be-at-risk-form

13. PEER ABUSE

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should recognise that young people are capable of abusing their peers. All staff should be aware of safeguarding issues from peer abuse including:

- Bullying (incl. cyber bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals

This abuse can

- Be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm. Young people who harm others may have additional or complex needs.

Stopping violence and ensuring immediate physical safety is the priority but emotional bullying can sometimes be more damaging than physical. WCT staff, alongside their DSO and DSA must make their own judgements about the seriousness of each specific case.

In order to prevent peer abuse taking place, WCT has three rules in place which all young people must follow; be kind, be brave and be yourself. Young people should be reminded about these rules by the lead practitioner. Staff should also ensure all activity is supervised by appropriate number of staff and that any instances of inappropriate behaviour or bullying are recognised and immediately dealt with by staff.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the young people and the parents/carers when they become involved. Avoid language that may create a 'blame' culture and leave a young person labelled.

Staff will talk to the young people in a calm and consistent manner. Staff will not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Staff will

- Always take complaints seriously
- Gain a statement of facts from the young people
- Assess needs of victim and alleged perpetrator

- Record all incidents and all action taken

If staff believe young people to be at risk of harm, they will bring the incident to the DSO/DSL who will follow the Child Protection procedures.

If the young person is 13+ and does not want to share with parents, the DSO will use the 'Gillick' test and the 'Fraser' guidelines to assess whether or not to share with parents.

<https://learning.nspcc.org.uk/media/1541/gillick-competency-factsheet.pdf>

In all circumstances where the risk of harm to the child is evident then staff will encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way).

Follow-up conversations and mediation sessions with either the DSO and DSA may take place to resolve the issues if deemed appropriate.

If the situation cannot be resolved the DSO will have to consider the safety of the space and whether the young people can continue to participate in the company.

WCT will affirm at the beginning of all workshops that peer abuse between people is not accepted and that all matters will be dealt with seriously and the above procedure followed.

14. PRIVATE FOSTERING

Private fostering is an arrangement where a child or young person under the age of 16 (or under 18 if disabled) is looked after full-time for more than 28 consecutive days by an adult who is not their:

- Parent, step guardian or legal guardian
- Grandparent
- Brother or sister
- Aunt or uncle
- The arrangement is made between the child's parents and the private foster carer whose responsibility is the day to day care of the child.

Some common examples of private fostering – private fostering often occurs where:

- A teenager who isn't getting on with their parents goes to live with a friend's family
- Parents pay someone to care for their children while they are away working or studying
- Children are sent from abroad to live
- Children are placed with a family or friend or relative as a result of parental separation, divorce, arguments at home or a parent being hospitalised.

If a staff member believes a child is being privately fostering they need to inform the DSO or DSA who will make a referral to Lambeth's Children's Services Contact Team.

15. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS

WCT may work with children who have additional needs and/or communication difficulties and we are aware that they are vulnerable to abuse because they may be unable to express themselves to others. Instead such children may exhibit changes in behaviours or signs and indicators of abuse recognised by staff with good knowledge of the child. WCT staff will aim to build one to one strong relationships with SEN children with whom they can communicate confidently.

WCT will also support staff to attend additional training to offer extra support to young people with SEN.

16. PHOTOGRAPHY & VIDEO/FILMING

The use of photography for documentation and promotional purposes is recognised as an important aspect of WCT's work.

RISK FACTORS

Some of the potential risks of photography and filming at events include:

- Identification of a child when a photograph is shared with personal information
- Inappropriate photographs or recorded images of children
- Inappropriate use, adaptation or copying of images

RISK CONTROLS

WCT will:

- Not use a child's surname in photograph captions
- Gain parental/guardian consent for their child to be photographed and filmed
- Only use images of children in suitable clothing to reduce the risk of inappropriate use
- State written expectations of professional photographers or the press are invited to an event to make it clear of WCT's expectations on relation to child protection
- Not allow photographers unsupervised access to children

Extensive parental/guardian consent for photography and filming is sought for every member of WCT through the obligatory registration process.

EQUIPMENT USAGE

Where possible a WCT mobile phone or camera should be used for photography and recording. On occasions where core staff's personal devices are used to photograph young people in a rehearsal/event these should be uploaded to the secure drive as soon as possible and deleted from the device.

STORAGE OF PHOTOGRAPHY/FILMING

Images or video footage/recordings of children must be kept securely. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

SIGNAGE AT EVENTS

WCT will announce at all performances that 'video and photography is not permitted during the performance'.

17. RESIDENTIAL & OVERNIGHT ACTIVITY

WCT's programme of work includes opportunities for young people to attend residential activities, including international trips. The Safe Network (www.safenetwork.org.uk) advise organisations to consider the following when planning residential activities:

- Suitable travel arrangements which take due regard for passenger safety
- Duration of the journey and numbers of drivers required
- Traffic conditions, weather and insurance
- Journey and planned stopping times
- Suitability of vehicle if the group includes disabled passengers
- Aware of travel emergency procedures

WCT's programme of work includes opportunities for young people to attend overnight events. In such circumstances WCT will ensure that appropriate sleeping arrangements are put in place to protect children and young people. Adults should sleep in separate but nearby sleeping quarters. Separate sleeping areas need to be provided for males/females and as well for those above and those below the age of 16. Attention also needs to be given to safe access for the children/young people to staff and to toilet facilities during the night. When working with a mixed gender group off-site there should be access to staff/volunteers of both genders to manage sensitive activities (e.g. public toilets, intimate care etc).

18. DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

The DBS exists to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. A DBS check forms one part of the wider safeguarding process. It helps organisations to determine whether a person is a suitable candidate for a particular role by providing information about their criminal history.

CHECK LEVELS

Before an organisation considers asking a person to apply for a criminal record check through DBS, they are legally responsible for ensuring that they are entitled to submit an application for the job role. There are currently three levels of checks:

Standard checks reveal information relating to spent and unspent convictions, cautions, reprimands and final warnings from the Police National Computer (PNC). To be eligible for a Standard Check the position must be specified in the Expectations Order to the Rehabilitation of Offenders Act 1974, which protects individuals from having to disclose convictions after a certain length of time. Exceptions include 'those working with children and other vulnerable groups' and is therefore applicable to WCT.

Enhanced checks reveal the same information as Standard checks but also check against information held by local police forces (e.g. relevant on-going investigations). To be eligible for an Enhanced check the position must be specified in the Expectations Order to the Rehabilitation of Offenders Act 1974 and regulations made under the Police Act 1997. The Police Act includes 'work with children' and is therefore applicable to WCT.

Enhanced checks (with barred list) are used to check against lists of people prohibited from working with children and vulnerable adults. These are known as 'barred lists'. To be eligible for an Enhanced check (with barred list) the position must meet the above criteria and fall within the DBS definition of 'Regulated Activity'. This applied to only a few staff roles at WCT, see below.

The minimum age at which someone can apply for a DBS check is 16.

REGULATED ACTIVITY

Regulated Activity is work a person who appears on the DBS barred lists is prohibited from doing. This includes work that involves close and unsupervised contact with vulnerable groups, including children. Activities that place a staff member in Regulated Activity with children are:

1. Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on wellbeing, or drive a vehicle only for children;
2. Work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers;

Work under (1) is Regulated Activity only if done regularly. 'Regularly' means carried out by the same person frequently (once a week or more) or on four or more days in a 30-day period (or in some cases overnight). A person who managed or supervise a regulated activity is also counted as undertaking a regulated activity.

ASSESSMENT OF DBS NEEDS

In the context of WCT, Regulated Activity refers to weekly sessions.

Staff Type	Description	DBS Requirement
Employees, freelance staff and volunteers who delivers regular Regulated Activity staff	These staff undertake 'Regulated Activity' in the form of occasional unsupervised activity	Enhanced DBS check
Volunteers who attend sporadically	These staff will never undertake 'Regulated Activity' in the form of unsupervised activity	Risk assessment carried out

A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. It is up to an employer to decide if and when a new check is needed. It is WCT policy for any staff working in an unsupervised capacity to have an enhanced DBS dates within the last three years.

19. CHILD PERFORMANCE LICENSING

REQUIREMENT TO LICENSE

All children who perform on stage or in television, films, commercials or who work as models have their welfare and safety protected by the following children in entertainment legislation:

- Children and Young Persons Act 1933 & 1963
- Children (Performances) Regulations 1968
- The Children (Performance) (Miscellaneous Amendments) Regulations 1998(1)
- The Children (Performance) Amendment Regulations 2000
- The Children (Performance) (Amendment) (No.2) Regulations 2000
- Statutory Instruments: 1968 No. 1728, 1998 No. 1878, 2000 No. 10, & No. 2384

For the purposes of children in entertainment a child is a person aged from birth until the end of their compulsory schooling (18 years from 2015).

The above legislation requires licenses to be issued by each Local Authority (LA) for children who take part in one of the following categories:

- Broadcast performances (films, TV, video)
- Non-broadcast performances (theatre, modelling)

It is the responsibility of WCT to establish contact with the relevant LA in which a child resides to obtain instructions as to whether a license is required. It should be noted that there will be occasions when a license is not required, see 'Exemptions' sections below. WCT work with Superarts Agency who is responsible for obtaining licenses for those young people on their books.

The Children (Performance) Regulations 1968 only apply to actual performances and therefore the following information does not apply to rehearsals or regular workshops. Rehearsals are, however, affected by the Regulations, if they take place during the currency of a license (between first and last performance day). Rehearsals are then subject to the same restrictions and conditions applicable to that license i.e. time at place of performance, performing times and so forth. Rehearsals also count as a performance when calculating length of working week i.e. five days broadcast, six days theatre/other.

Appendix 5 shows the regulations of times and hours as required by the Children (Performance) Regulations 1968. All categories of children's entertainment licensing, including both license exemptions, are subject to these times and hours.

CHAPERONES

All licensed children need to be chaperoned in law while taking part in performance. Chaperones acts in loco parentis and should exercise the care which a good parent might reasonably be expected to give the child. Regulations require a ratio of one chaperone to 12 children.

A chaperone's priority is always to the child and the chaperone must not take part in any activity that would prevent them from proper supervision and care of the children they are responsible for. A chaperone will have total charge of a child – unless the child is being chaperoned by their parent/carer – whilst the child is at the theatre/performance location, and is responsible for the child's care and control. If the child has completed their performance and is handed into the care and control of their parent/guardian who is outside of the stage performance area, the chaperone will no longer have responsibility for the child.

Chaperones are required by law to keep a record for each child, per performance:

It is a requirement under the Regulations that these records be kept and made available, together with each child's License, at every place of performance where a child is present, for inspection by an officer for the LA in whose area the performance take place.

Upon completion of the production, the daily record sheet/s should be stored at the License Applicant's main company address for a period of not less than six months after the final performance date for which the License has been granted.

CHILD PERFORMANCE LICENSE EXEMPTIONS

Exemption One – The 'Four day' Rule

The 'four-day rule' is an exemption that can be considered for use by both professional and amateur companies. This exemption states that a license is not required for a child if:

- They perform for only four days in any six-month period; and
- They do not need time off from school to undertake the performance; and
- They do not receive any payment other than expenses.

Children who fall within the exemptions and do not need a license are still covered by Regulations 21, 22, 33 and 34 of the Children (Performance) Regulations 1968 covering the number of days on which children may perform and permitted hours of performance (see Appendix 5).

WCT will use the four-day rule where appropriate; however, this will only be done in consultation with relevant LA Education Welfare Teams who will be required to know the names of the children taking part in the production, and the production date.

Exemption Two – Body of Persons License

The Children & Young Persons Act 1963 gives LA under section 37(3)(b) the power to issue a license to a Body of Persons e.g. a group of responsible adults (youth organisations, amateur dramatics etc) to enable them to engage children in non-broadcast and recorded performances without the need to apply for separate licenses for each child for each production. Where appropriate, WCT will apply for a Body of Persons License.

The Body of Persons must then provide the Education Authority with the following information in advance:

- Names, addresses and dates of birth of all the young people who will be performing;
- Venue and dates of performances;
- Names and addresses of the adults forming the Body of Persons.

Approval can be granted providing:

- The child performers receive no payment other than expenses;
- The performance is for a stage production;
- The performances all take place within the LA that is granting the Body of Persons License;

- The child performers are supervised by the adults who form the Body of Persons or licensed chaperones;
- The organisation complies with the regulations on days and permitted hours of performance contained in the Children (Performance) Regulations 1968 (see section 7 of Good Practice);
- That the Child employment Team agreed that the rehearsal/performance venue(s) are suitable places for children to perform;
- The organiser has ensured appropriate arrangements are in place to transport the child performers to and from the venue and for them to be released into the care of an appropriate person;
- The organiser will not use the children in performances that may be dangerous;
- The organiser can demonstrate that they meet any health, safety and welfare conditions set by the LA;
- The Body of Persons ensure that arrangements are made to transport young performers to and from the venue;
- The Body of Persons does not use young people in performances that may be dangerous.

The holders of the license must ensure that they keep records of each young person's performance as required by Schedule 3 Children and Young Persons, The Children (Performance) Regulations 1968 (see ECC proforma). Approval can only be granted for young people who perform solely for the holder(s) of the Body of Persons license.

Although the law does not place a statutory obligation on organisations to ensure that chaperones are provided for unlicensed children, LAs prefer that all children are provided with a chaperone as a condition of granting a Body of Persons license. The LA believes this preference is justified as a matter of good practice and to ensure that all children benefit equally from child protection procedures.

WCT will obtain a Body of Persons license where appropriate and upon the advice of relevant LA Education Welfare Team.

20. WHISTLE BLOWING

WCT expect all staff and employees including adults working with children and young people, temporary staff, volunteers, students, contractors or external partner agencies, to express any concerns that they may have with regards to the conduct of any individual(s).

This policy is intended to encourage and enable our staff to raise their concerns and to do so without fear of victimisation discrimination. It does not replace the Complaints Procedure for reporting allegations or concerns about staff or volunteers.

This policy is designed to cover concerns that staff have about the conduct of individuals in a position of trust within the organisation which could be detrimental to the safety or wellbeing of young people and where staff, for whatever reason, feel

unable to raise them under the organisation's standard child protection procedures around dealing with such allegations. It would include issues about:

- Unprofessional behaviour
- Bullying by staff
- Any form of abuse (Physical, sexual, emotional or neglect)
- Personal contact with children and young people which is contrary to the organisations policies and codes of conduct
- Any form of racial abuse
- Inappropriate sexualised behaviour
- Knowledge about an individual's personal circumstances which may indicate they could be at risk to children or unsuitable to work with children.

Please be mindful that these are examples of concerns, they are not exhaustive.

All concerns will be treated in confidence, however, there may be a need for the whistle blower to give evidence e.g. if they have witnessed a crime or in regard to disciplinary procedures if this is the outcome.

This policy encourages staff to raise concerns to be identified in doing so as part of their professional role/responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

If staff raise a concerns in good faith which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

Staff should normally, under standard procedures raise their concerns with either the DSA or any of the Company Directors. Under standard procedures, if there are concerns that an adult working with children and young people may have abused a child, or be unsuitable for work with children and young people, concerns will be passed to the LADO by the DSO or the DSA if the allegation concerns the DSO.

In certain circumstances, staff may feel they are unable to follow the organisation's standard procedures e.g. because they feel their position in the organisation would be in jeopardy, they would be subject to intimidation or that the person of the concern is the designated manager to whom they should be reporting such matters and there is no one senior to refer to. They should then contact a nominated person (the 'responsible' person) within the organisation or an umbrella organisation to which the organisation is affiliated. In this case contact:

Lambeth Social Services
Office hours duty team: 02079265555
Out of hours team: 02079265555

The Policy may also be used in circumstances when the matter has been raised under appropriate organisation procedures for referring child protection concerns, but the referrer considers that the manager has not taken the concerns seriously or acted appropriately with relation to them. In such circumstances, referrers are

encouraged to contact a LADO directly for discussion and advice. All concerns should be recorded in writing.

APPENDIX 1 – CONTACT DETAILS

Role	Postholder(s)	Mobile number
Designated Safeguarding Lead Officer	Anna Glarin (Co-Artistic Director)	07963601205
Designated Safeguarding Ambassador	Mark Johnson (Co-Artistic Director)	07792797247
Lambeth Social Services	N/A	02079265555
Lambeth Council's LADO	N/A	02079265555

APPENDIX 2 – CODE OF CONDUCT FOR STAFF

Safeguarding Code of Conduct

Waterloo Community Theatre (WCT) has a duty of care to safeguard from harm all children and young people with whom it interacts. Our Safeguarding Policy details the legal requirements, organisational procedures and best practice as applicable to staff. This Code of Conduct and accompanying guidelines contains information as applicable to freelance staff who are engaged with WCT to work with young people.

Dealing with a disclosure

If you suspect a young person is being abused or is at risk it is your duty to report it to WCT staff. If a young person tells you directly they are abused you should do the following:

1. Allow them to speak without interruption and accept what they say
2. Be understanding and reassuring but do not give your opinion
3. Tell them that you will be required to pass the information on
4. Write succinct notes of what was said, noting actual words used where possible
5. Inform a senior member of staff immediately

Information sharing is key. If you have a concern about a young person's safety talk to a member of staff. If the young person is at immediate risk of harm WCT staff will contact the police or social services.

All staff have the right to report concerns about another member of staff in confidence. If you are in any doubt, always contact a member of WCT staff. WCT staff contact numbers are:

Anna Glarin
Co-Artistic Director
07963601205

Mark Johnson
Co-Artistic Director
07792797247

Code of Conduct

- Do set an example for others to follow
- Do ensure that activities you deliver involve more than one adult being present
- Do avoid unacceptable situations within a relationship of trust
- Do allow young people to talk about any concerns they may have
- Do encourage others to challenge attitudes or behaviour they do not like
- Do avoid being drawn into inappropriate attention-seeking behaviour
- Do make everyone aware of our safeguarding arrangements
- Do remember this code at sensitive moments
- Do tell other leaders where you are and what you are doing
- Do remember someone else might misinterpret your actions, even if you mean well
- Do take allegations or concerns of abuse seriously
- Do refer all concerns to WCT staff members
- Do not form a relationship with a young person that is an abuse of trust
- Do not drink alcohol when you are directly responsible for young people
- Do not allow abusive activities, for example initiation ceremonies or bullying
- Do not take part in inappropriate behaviour or contact (physical, verbal or sexual)
- Do not make suggestive remarks or threats to a young person, even in fun
- Do not let allegations, suspicions or concerns about abuse go unreported

APPENDIX 3 – WORKING WITH YOUNG PEOPLE GUIDELINES

Disclosure and general behaviour

Follow the code of conduct and the safeguarding policy.

Alert a member of WCT staff immediately.

Other information

Any other information that isn't a disclosure but might help us support the member should be shared with the team.

Fights or physical violence

Use your common sense: don't put yourself at risk.

Separate the people involved if appropriate.

Create space for them to calm down.

Ensure the group is managed properly.

Alert a member of staff immediately.

Accidents of injuries

Address the immediate need depending on your training and experience.

Ensure the group is managed appropriately.

Clear the room if necessary.

Alert a WCT staff member or other premises manager (whoever is nearest) immediately.

Minor injuries that don't require first aid

If you are confident to do so, give help. If not, treat as above. Inform a WCT member of staff at the end of the session.

Tackling unkindness

Group leaders should deal with this firmly and clearly. It is useful to refer back to the three rules of WCT and reiterating the importance of kindness to our process.

If serious, alert a member of staff immediately.

If minor, inform them at the end of a session.

Arguments and friendship breakdowns

It is not our job to solve friendship breakdowns. The emphasis should be on them being able to participate in the room together.

If serious, alert a member of staff.

If minor, inform staff at the end of the session.

Toilets and dressing rooms

All staff should only use single-cubicle toilets (e.g. disabled toilets). If it is essential to go into a toilet used by the young people, be vocal about entering, leave the door open and go in pairs if possible. Leave the toilets as soon as possible.

Working one on one

Any one on one work with young people should not be undertaken by a junior member of staff. Please refer to our safeguarding policy for best practice.

Phones and social media

Do not share your personal contact details with young people, or vice versa and do not follow them on social media. We do not expect staff to protect their personal social media accounts but to respect their association with the company when posting. If your social media accounts are not private, be aware that young people may find and follow you on them and bear this in mind when posting.

Video and photography

Only record or take videos on a company phone. If you have to use your own equipment please consult WCT staff before doing so.

Young assistants and employees

Young employees (particularly who have recently been company members) will need support and guidance from group leaders in managing these guidelines. All assistants and employees should always pass information and responsibility to group leaders immediately in any of the above situations.

Where mentors see or socialise with company members, they still have a duty to report to staff any information that may indicate the member is in danger as per the safeguarding policy and our duty of care to all young people.

APPENDIX 4 – DEFINITIONS & SIGNS OF ABUSE

In order to effectively protect children and young people, staff should be familiar with the key signs and indicators of abuse, which are detailed below:

PHYSICAL ABUSE

Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child.

An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken. Patterns of bruising that are suggestive of physical abuse include:

- Bruises that are seen away from bony prominences;
- Bruises to the face, back, stomach, arms, buttocks, ears and hands;
- Multiple bruises in clusters;
- Multiple bruises in uniform shape;
- Bruises that carry the imprint of an implement;
- Cigarette burns;
- Adult bite marks;
- Scalds.

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness should be seen promptly by a doctor. Behaviour change can also indicate physical abuse:

- Fear of parents being approached for an explanation;
- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, e.g. wearing long sleeves in hot weather;
- Depression or withdrawn behaviour;
- Running away from home.

EMOTIONAL ABUSE

Emotional abuse happens where there is a relationship between a carer and a child and can manifest in the child's behaviour or physical functioning.

Emotional abuse can be difficult to measure, and often children and vulnerable adults who appear well-cared for may be emotionally abused by being taunted, put down or belittled. Emotional abuse can also take the form of children not being allowed to mix/play with other children. The physical signs of emotional abuse may include:

- Failure to thrive or grow;
- Sudden speech disorders;
- Developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- Neurotic behaviour, e.g. sulking, hair twisting, rocking;
- Being unable to play, or fear of making mistakes;
- Fear of parent being approached regarding their behaviour;
- Self-harm

SEXUAL ABUSE

Sexual abuse involved the use of a child for gratification or sexual arousal by a person for themselves or others.

Adults who use children and/or vulnerable adults to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually in cases of sexual abuse it is the children or vulnerable adult's behaviour which may cause you to become concerned, although physical signs can also be present. In all cases children and vulnerable adults who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously. The physical signs of sexual abuse include:

- Pain or itching in the genital/anal areas;
- Bruising or bleeding near genital/anal areas;
- Sexually transmitted disease; vaginal discharge or infection;
- Stomach pains;
- Discomfort when walking or sitting down.

The following changes in behaviour may also indicate sexual abuse:

- Sudden or unexplained changes in behaviour (e.g. becoming aggressive or withdrawn);
- Fear of being left with a specific person or group of people;
- Sexual knowledge which is beyond their age or developmental level;
- Self-harm or mutilation, sometimes leading to suicide attempts;
- Suddenly having unexplained sources of money;
- Acting in a sexually explicit way towards adults;
- Sexual drawings or language.

NEGLECT

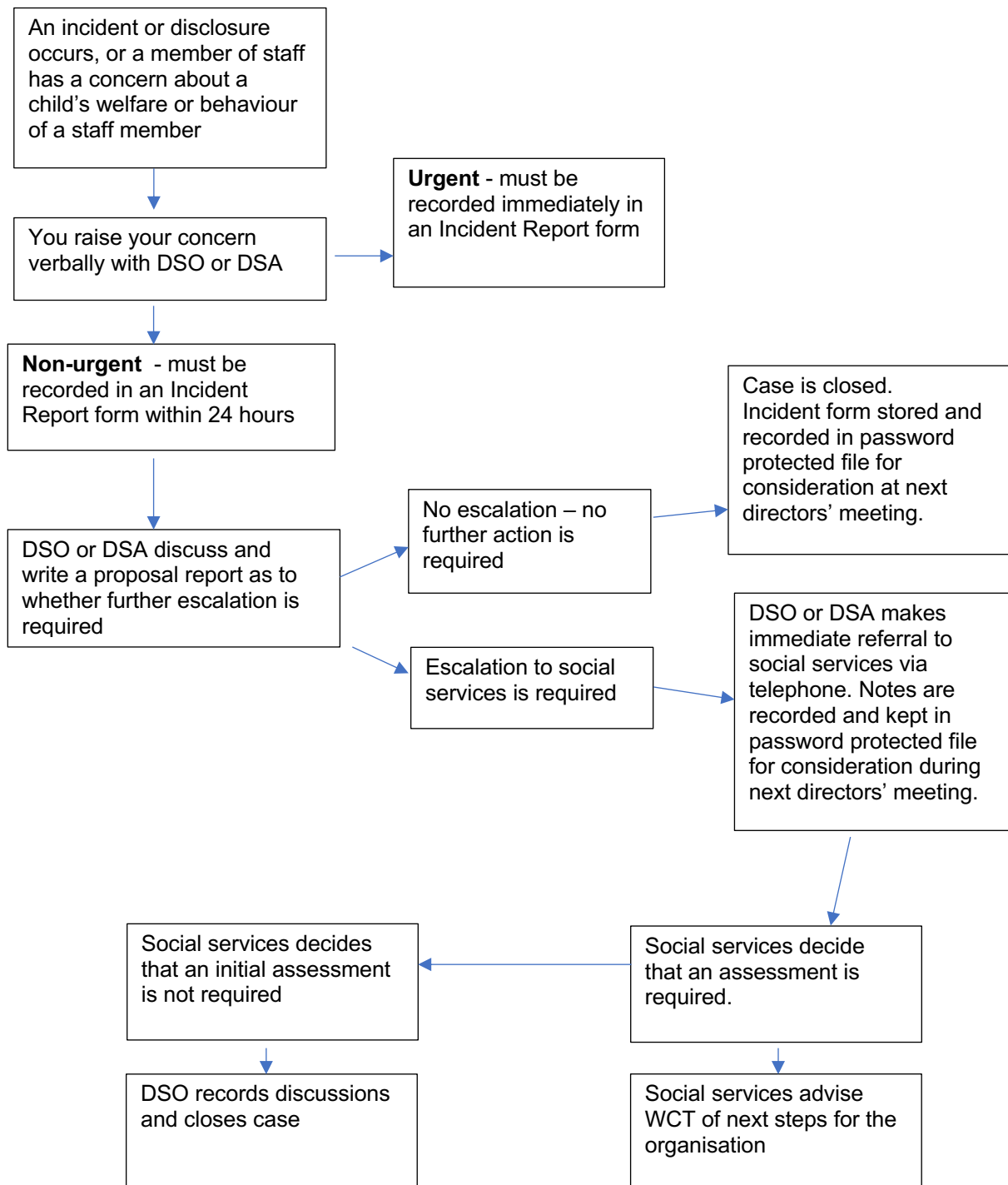
Neglect results in a child suffering significant harm or impairment of development as a result of being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, or medical care.

Neglect can be a very difficult form of abuse to recognise. The physical signs of neglect may include:

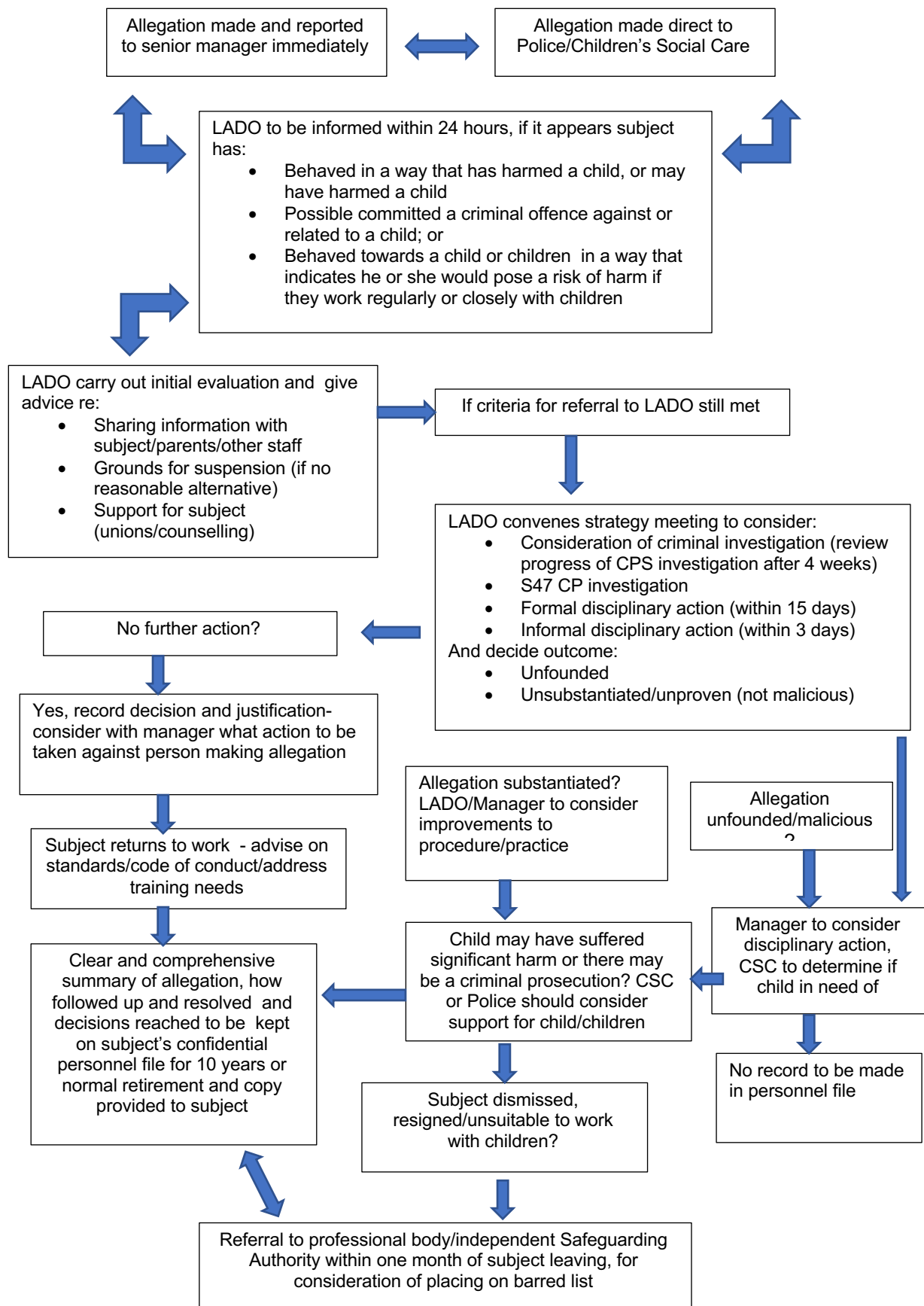
- Hunger, sometimes stealing food from others;
- Constantly dirty or smelly;
- Loss of weight, or being constantly underweight;
- Inappropriate dress for the conditions.

APPENDIX 5 – REFERRAL INTERNAL ESCALATION PROCEDURE - FLOWCHART

This quick-guide flowchart is designed to advise on the most appropriate action to be taken if you witness an incident or disclosure, or you suspect abuse, poor practice or a breach of the Safeguarding Code of Conduct:



APPENDIX 6 – REPORTING FLOWCHART FOR ALLEGATIONS MADE AGAINST STAFF



APPENDIX 7 – INCIDENT REPORT FORM

Part A – to be complete and sent to DSO, DSA or LADO

DETAILS OF PERSON COMPLETING THIS FORM	
Your name/role:	
CHILD'S DETAILS	
Child's name:	
Child's date of birth / current age	
INCIDENT / DISCLOSURE DETAILS	
Date / time of incident / disclosure:	
Location of incident / disclosure:	
Please detail what happened. Use quotation marks to accurately record what was said by yourself and the child:	
Immediate action taken:	
HAVE ANY EXTERNAL AGENCIES BEEN CONTACTED? IF SO, STATE WHO AND GIVE DETAILS	
External agency:	
Name of contact:	
What advice has been received:	
DATE / TIME REPORT COMPLETED	
Date / time:	

Part B – to be completed by members of the Safeguarding Team

FEEDBACK RECEIVED FROM THE SAFEGUARDING TEAM	
Name:	
Feedback / advice:	

Part C – to be completed following decision with the Safeguarding Team

DECISION MADE REGARDING REFERRAL TO SOCIAL SERVICES	
Should this matter be reported to the Social Services?	Yes / No
On what basis has the above decision been made?	

This report must be emailed to the DSO/DSL.

APPENDIX 8 – CHILD PERFORMANCE LICENSE REQUIREMENTS

The following chart shows the regulations of times and hours as required by The Children (Performances) Regulations 1968. All categories of children's entertainment licensing, including both license exemptions are subject to these times and hours.

Performances (same nature)	2 per day	1 performance & 1 rehearsal OR 2 performances
Performances per week	Max. 6 days per 7 day week	Max. 8 consecutive weeks requires 2 week interval before performing again in ANY production
Time Gap between performance days	14 hours must elapse between the end of the previous day's performance and the beginning of the following day's performance	
Performance Time	Max. 3 hrs 30 mins	Including breaks
Appearance in performance	Max. 2 hrs 30 mins	Aggregated
Intervals	1 ½ hrs minimum	Between 2 performances OR 1 performance & 1 rehearsal
Exception to intervals (in any week)	On not more than 2 days minimum of 45 mins interval between performances and/or rehearsals. Maximum 6 hrs at place of performance.	
School Day	Attending school after the morning session	1 performance OR 1 rehearsal only
Performance hours	Age 12 & under	Age 13 & over
Earliest arrival	10am	10am
Latest departure	10pm	10pm
Exception (1)	10.30pm	11pm
Exception (2)	Not later than 11pm on not more than 3 evenings per week, provided that s/he is not so present on more than 8 evenings in a period of 4 consecutive weeks	
Medical (1)	YES (period longer than 1 week)	Performing over 6 consecutive days
Medical (2)	NO (period less than 2 week)	Performing under 6 consecutive days
Arrangements for getting home	Applicant shall ensure that suitable arrangements (having regard to the child's age) are made for the child to get to his/her home or other destination after the last performance or rehearsal or the conclusion of any activity on any day	

APPENDIX 9 – REFERENCE FORM

This reference is for:	
Post offered:	
Please confirm employment dates:	From: To:
The applicant's most recent job title:	
Main duties/responsibilities of the post:	
Reason for leaving employment:	
How long have you known the applicant?	
Does the candidate perform his/her duties satisfactory?	Yes No
If no, please give details of any areas needing improvement:	
Please confirm how many days sickness the applicant has had in the last 24 months:	
Can you think of any reason why this person might not be suitable for the role he/she has applied for?	
Please comment on the effectiveness of the applicant's interactions with children and young people:	

Are you completely satisfied that the applicant is suitable to work with children and young people? If no, give details.	Yes No
To the best of your knowledge has the applicant had a allegation made against them regarding their behaviour towards children/young people?	Yes No If yes, give please give details:
Has the applicant been subject to any disciplinary action relating to his/her suitability to work with children/young people in which penalties were imposed?	Yes No If yes, please give details:
Would you re-employ the applicant?	Yes No If no, please give details:
Has a DBS check been carried out by your organisation?	Yes No If yes, please state when:
Please state whether you would recommend the candidate for the post without reservation:	
Printed name:	
Signature:	
Position:	
Organisation name:	
Date:	

Please return the reference by email using a recognised employer's email and making sure that you include the organisation's logo in the email.