

Groundlings  
THEATRE

# THE GROUNDINGS THEATRE TRUST

## Safeguarding Policy and Operational Procedures

***Created:*** December 2019

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# **Contents**

Policy Statement	3
Staff Roles and Responsibilities	4
Maintaining Good Practice	5
1. Staff and Volunteer Procedure	
2. Outings and trips	
3. Incidents and accidents	
4. Use of the premises	
Responding to a concern	8
Communication with Children and Young People	11
Adults at Risk Policy	13
Safer Recruitment	15
Photography and Video	17
E- Safety	17
Implementation Checklist	18
Who to Contact	19
Appendix	
1. Code of Conduct for Staff and Volunteers	20
2. Definitions and Signs of Abuse	21
3. Reporting your concerns flowchart	
a. Children and Young People	28
b. Adults at Risk	29
c. Allegations Against Staff	30
4. DBS Checks	
a. Check Levels	31
b. Regulated Activity Definition's	32
c. Groundlings DBS Policy	32
5. Safeguarding incident report / Cause for concern form (MASTER)	35
6. Child Performance License	40

## **Policy Statement**

The Groundlings Theatre Trust (herein referred to as 'Groundlings Theatre') has a duty of care to safeguard from harm all children and young people, and adults at risk with whom it interacts. Children, young people and adults at risk occupy a key place within Groundlings Theatre and our work. Groundlings theatre supports the right of all regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, to be protected from harm, and recognises that safety and welfare are paramount. We strongly believe that all children and young people, and adults at risk have the right to be treated fairly, justly and have the right to freedom from abuse and harm.

This policy details the legal requirements, organisational procedures and best practice as applicable to all staff. This policy applies to all Groundlings Theatre staff, including those who work on a volunteer and freelance basis as well as Groundlings Theatre's Board of Trustees.

Our policy ensures that all our staff and volunteers are carefully selected and vetted, have the relevant qualifications and experience, and accept responsibility for helping to prevent the abuse of children and young people in their care. We aim to offer comprehensive advice to Groundlings Theatre staff members and freelance artists with regards to legal requirements and good practice.

All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.

We have procedures in place to address poor practice, and to help any child/young person who appears to be at risk, or who appears to be a victim of abuse. We will offer help and support when a child/young person tells us that they are affected by these issues. We will work extensively with external agencies such as the NSPCC and the police to ensure as far as possible that children and young people are protected.

The terms "child", "children", "girl" and "boy" "young person", "young people", "young woman" and "young man are used to refer to anyone under the age of 18.

The term 'adult a risk' refers to anyone over the age of 18 who may be unable to take care of themselves, unable to protect themselves, a person with a mental illness, visual impairment or a person over the age of 70.

We will not tolerate bullying. Incidents of bullying will be investigated and treated seriously. Action will be taken to stop the bullying.

## **Staff Roles and Responsibilities**

Executive and Creative Director:	<b>Tobias Robinson</b>
Designated Safeguarding Officer:	<b>Tobias Robinson</b>
Lead Trustee for Safeguarding:	<b>Chris Allison</b>

The Designated Safeguarding Officer leads upon policy development and reporting, including:

- Reviewing and updating the organisation's safeguarding policy on an annual basis or when necessary
- Leading upon contact with Local Authority Social Services in the event that a child/young person is at risk of harm
- Managing complaints about poor practice and allegations against staff/volunteers
- Referring relevant issues of safeguarding to the Board of Trustees for consideration
- Collecting monitoring data on all safeguarding activities across the organisation
- Ensuring safer recruitment procedure and promoting safeguarding across the organisation

The Lead Trustee for Safeguarding leads upon policy and procedure oversight, including:

- Ensuring that policy and procedures are fully implemented and followed by all staff
- Being kept informed of all serious safeguarding incident forms and feeding in as necessary
- Reporting to Trustees upon any observations and/or findings concerning safeguarding

All members of staff/volunteers have a responsibility to safeguard children and young people from harm, including:

- Being vigilant of the signs that may indicate a child/young person is experiencing harm or is at risk of harm
- Report any disclosures or concerns, as soon as possible, to the Designated Safeguarding Officer or the Lead Trustee for Safeguarding.
- When taking a disclosure from a child/young person remembering not to ask any leading questions

## **Maintaining Good Practice**

### **A. Staff + Volunteer Procedure**

- i) As an organization working with children the Company has a designated Child Safeguarding Officer who has undergone appropriate child protection training. It is the responsibility of this person to make his/herself available for consultation by staff, volunteers, visitors, children and their families;
- ii) All staff, paid or voluntary, are responsible for children while on these premises or engaged in Company activities and must make sure that health and safety guidelines are adhered to;
- iii) All staff, paid or voluntary will receive basic child protection training;
- iv) All staff, paid or voluntary who undertake a regulated activity unsupervised will require an enhanced DBS check including the child barring list.
- v) All staff, paid or voluntary who undertake a regulated activity supervised will require an enhanced DBS check. In this instance supervised means all of the activity takes place in the eyesight and earshot of another member of staff at all times.
- vi) All staff, paid or voluntary who undertake an unregulated activity do not require a DBS check but will be supervised by a member of staff with an enhanced DBS check at all times.
- vii) No member of staff or volunteer will be left alone with a child on an individual basis where they cannot be observed by others;
- viii) Under no circumstances may visitors be allowed to wander around the premises unaccompanied when children and young people are present;
- ix) Where possible there should always be at least two adults present with a group of children – it is vital that the ratio of adult to child is adequate to ensure safety. At all the times the ratio should be no more than 1:12; for children under 8 the ratio should be no more than 1:8; for children under 5 it should be no more than 1:6. All ratios are specific only to a single gender, for example if under the 1:12 ratio, the group has mixed genders, a second adult will be required;
- x) A register of children will be kept for every activity. A record of the name, address, contact number(s) for parents and carers and any other necessary information will be kept for every child participating in Company activities. This information will be held confidentially and securely;
- xi) For all performances and formal rehearsals that are not considered teaching; the information required as defined under the provisions of the Children and Young Persons Act 1963 shall be kept for every child participating in every rehearsal and performance;
- xii) Staff should be alert to strangers frequently waiting outside a venue with no apparent purpose. Children must be signed in and signed out by their parent/carer or an adult given delegated authority in advance by a parent/carer. Children can only leave an activity and return to the public with prior written permission from a parent/carer;

- xiii) If a child is not collected after a session it is reasonable to wait approximately half an hour for a parent or carer to arrive. If a parent or carer cannot be contacted, staff should contact the relevant Portsmouth MASH or the police and request assistance;
- xiv) Photographs of children will not be taken without the signed consent of the parent or carer
- xv) There will be no physical contact by staff/volunteers with children unless in the following permissible circumstances; a staff member with an enhanced DBS check teaching children or running a rehearsal may use appropriate physical contact to prevent a child from injuring themselves or causing serious injury to others. If a child seeks to initiate physical contact, the staff member or volunteer must seek to avoid if possible and replace the contact with a more appropriate acknowledgement;

## **B. Outings & Trips**

- i) All vehicles hired for outings must be insured, roadworthy and fitted with fire extinguisher and seatbelts;
- ii) Staff are not to use their own vehicles to travel with children unless they are covered under their insurance – evidence must be provided of this to the Designated Safeguarding Officer
- iii) All drivers must travel with at least one escort. Drivers and escorts should have up to date DBS (CRB) checks and been subject to appropriate recruitment procedures. All drivers and escorts should agree to abide by these guidelines. If the company hires a vehicle with driver, we require written assurance from the vehicle owner that the driver has a valid DBS check.
- iv) Parent or carer's consent in writing will be obtained before taking any child off site
- v) A roll call will be taken at the start of a journey and again before commencing the return journey; if travelling in more than one vehicle, children will be required to travel in the same vehicle there and back;
- vi) Staff accompanying trips will carry the contact numbers for the home organisation and emergency services in the event of an alert being necessary;
- vii) A full list of children taking part in any off site activity, the bus in which they are travelling and their contact details must be left at the theatre for use in an emergency
- viii) If a child goes missing while on a trip, staff should instigate an immediate search. If the child cannot be found within half an hour, the appropriate security staff and the police plus the home base contact person should be notified;
- ix) If, having notified security staff and the police, the child cannot be found, the parents/carers of the child must be notified immediately;
- x) The care of the remaining children is paramount. It is imperative that they return to the home site as quickly as possible, if possible, a senior staff member should remain at the visit site to co-ordinate contact between security staff and the child's parents/carers.

## **C. Accidents**

- i) All accidents will be recorded in an accident / incident book stored away from the public but easily accessible for all staff both paid and unpaid. Regularly checked first

aid kits will be readily accessible at all times. We have three first aid kits available across the venue and checks are made quarterly and a record kept with each kit.

- ii) If an injury is suspected to need medical attention then an ambulance will be called and the parent or carer informed. If the parent or carer has not arrived by the time the ambulance arrives, a member of staff or volunteer will accompany the child to hospital, remembering to take any medical information with them. If RIDDOR applies, the accident will be reported to the Health & Safety Executive
- iii) If a member of staff or volunteer takes a child to hospital or home in their own-vehicle, a second adult must be provided as an escort or, preferably, use a taxi
- iv) Medical conditions will be recorded and relevant staff and volunteers made aware. Medicines will only be dispensed on the written authority of the parent or carer and children with asthma should have access to and capability to self-medicate

#### **D. Use of premises by other organisations**

- i) In the event that a room or rooms on the premises are used by other organizations, the letting agreement will require that the hiring organization works to approved child protection procedures and / or that they read and agree to abide by these guidelines.

## **Reporting to a Concern**

### **A. Identifying types & indicators of abuse**

- i) In order to effectively protect children and young people, and adults at risk 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;
- Neglect.

All staff are required to acquaint themselves with indicators of abuse (*please see appendix 2*).

### **B. Hearing a disclosure**

- i) If a child/young person says or indicates that he or she is being abused, or information is obtained which gives concern that a child/young person is being abused, you should follow the below guidance:

#### **RECEIVE:**

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and react calmly so as not to frighten the child/young person.
- Make a note of what has been said as soon as practicable.

#### **REASSURE:**

- Reassure the child/young person, but only so far as is honest and reliable.
- Tell the child/young person they are not to blame and that it was right to tell; I am glad you came to me.
- It is important that you do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a child/young person and then break it, you confirm to the child/young person yet again that adults are not to be trusted.

#### **REACT:**

- React to the child/young person only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Take what the child/young person says seriously, recognising the difficulties inherent in interpreting what is said by a child/young person who has a speech disability and/or differences in language;
- Do not ask 'leading' questions, for example 'what did he do next?' (This assumes he did!), or 'did he touch your private parts?' Such questions may

invalidate your evidence (and that of the child/young person) in any later prosecution in court.

- Explain what you have to do next and whom you have to talk to.

**RECORD:**

- Record the conversation as it happened on the Groundlings Cause for Concern Form (see appendix). Make sure that this is verbatim to your conversation and does not include assumptions or opinions.
- Do not destroy your original notes in case they are required by a court.
- Record the date, time, place, persons present and any noticeable non-verbal behaviour.
- Be specific when noting the words used by the child/young person.

**REMEMBER:**

- To share your concerns with the Designated Safeguarding Officer or the Lead Trustee for Safeguarding who will may take the matter forward.
- Ensure your form is stored securely so that no one else can access it.

Sometimes you may just feel concerned about a child but do not know whether to share your concerns or not. In this situation you should always raise your concerns with the Designated Safe Guarding Officer, who will help you to decide what to do. Your concern could be the missing piece of the puzzle.

If you still feel concerned that a child is being abused (or is at risk of abuse), this should be referred immediately to the MASH (OOH duty where appropriate) or where there is an immediate risk of harm to the police. The contact details for these are listed later in the policy.

The responsibility for investigating allegations of abuse, whether they result from the disclosure of a child or the concerns of an adult, lies with social workers and the Police Child Abuse Investigation Team (CAIT). It is normally the responsibility of the Designated Child Safeguarding Officer to make a referral to these agencies, but if you judge the situation to be an emergency and / or you require urgent advice in the absence of the designated officer, you must report your concerns directly, using the contacts listed at the back of these guidelines.

If they decide to pursue a child protection investigation, you may be required to:

- Work closely and collaboratively with all professionals involved in the investigation, in order to keep the child safe;
- Attend a child protection conference if you are invited. You will be asked to provide information about your involvement with the child, which is why it is important to keep records of your observations, contacts and concerns;
- Attend any subsequent child protection review conferences

If a concern is allayed and a decision is made not to make a referral then Groundlings Theatre 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.

### **C. Allegations of misconduct or abuse by staff**

- i) In the event of allegations being made against an employee (staff or voluntary), Groundlings Theatre 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 welfare issues about children and young people and the staff employment issues.

Two separate procedures must be followed:

- a) In respect of the child/young person the Designated Safeguarding Officer will lead the process related to the child/young person;
  - b) In respect of the staff member against whom the allegation is made the Lead Trustee for Safeguarding will lead the process related to the staff member.
- ii) With regards to the child/young person, the aforementioned process will be followed. With regards to the staff member against whom the allegation is made, the below process will be followed:
  - iii) Groundlings Theatre is legally required to alert the LADO (local authority designated officer) within 1 working day to all cases in which it is alleged that a person who works with children and young people has:
    - a) Behaved in a way that has harmed, or may have harmed, a child/children and/or a young person/young people;
    - b) Possibly committed a criminal offence against a child/children and/or a young person/young people;
    - c) Behaved towards a child in a way that indicates s/he is unsuitable for such work.
  - iv) The LADO will instruct Groundlings Theatre on procedure and what information may be shared with the person who is the subject of an allegation. Groundlings Theatre 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.
  - v) Subject to advice from the LADO, and to any consequent restrictions on the information that can be shared, Groundlings Theatre will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome.
  - vi) In all instances Groundlings Theatre 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 and outcome of any investigation and the implications for any disciplinary or related process.

**Contact details for Portsmouth's LADO are provided in section 8.**

A flowchart for reporting procedures and for allegations against staff are provided in appendixes 3.3.

## **Communication with Children and Young People**

### **A. Communication via telephone**

Staff should in no circumstances make or receive calls, to or from children and young people using their personal mobile phones. Staff should look to avoid contact with a child or young person over the phone but if necessary or occurs due to circumstance staff members should ensure to take the call in an open environment where the conversation can be witnessed.

### **B. Communication via email**

Staff will, on occasion, be required to email children and young people using their personal email address. **Personal email addresses of children and young people will be collected using a form which requires parental consent.**

In all cases staff should use formal language to avoid any misunderstanding on the part of the recipient and should be carbon copied to their line manager who will archive the message. Staff members who have concerns regarding content of an email that they send or receive from a child/young person should consult the Designated Safeguarding Officer for guidance.

### **C. Social media**

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

Current organisational accounts are as follows:

<b>Application</b>	<b>Account Domain</b>
Twitter	<a href="https://twitter.com/groundlingsuk">https://twitter.com/groundlingsuk</a>
Facebook	<a href="http://www.facebook.com/Groundlings.Theatre/">www.facebook.com/Groundlings.Theatre/</a>
Instagram	<a href="http://www.instagram.com/groundlings/">www.instagram.com/groundlings/</a>

Groundlings Theatre staff, permanent, freelance or volunteer, must not do any of the following:

- Send or accept any friend requests from a child or young person connected directly or indirectly with Groundlings Theatre on Facebook if their relationship began after /as a result of the child or young person's association with the company.
- Request to follow on other social media platforms, a child or young person connected directly or indirectly with Groundlings Theatre on Facebook if their relationship began after /as a result of the child or young person's association with the company.
- Send or respond to any private messages on social media from a child or young person connected directly or indirectly with Groundlings Theatre on Facebook if their relationship began after /as a result of the child or young person's association with the company.
- If a staff member is connected privately or asked accept invitations to or contribute to any groups, private or otherwise, relating to a child or young person in a Groundlings Theatre activity or production, they should direct them to an organisational account or

platform. If this doesn't occur, the staff member must not make any comment on, provide any opinion on, or reveal any information not directly linked to the child or young person.

- Groundlings Theatre does not expect its staff to protect their personal Twitter accounts (thereby making sure their tweets are only be visible to followers approved by the account holder) however it is does ask all staff to respect their association with the organisation when tweeting.

## **Adult at Risk of Abuse Policy**

This policy applies to all staff, trustees and volunteers who are working on behalf of Groundlings Theatre Trust.

### **This policy applies to adults (individuals aged 18 years or over) who:**

- Have needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Are experiencing, or is at risk of, abuse or neglect, and;
- As a result of those care and support needs, are unable to protect themselves from either the risk of, or the experience of, abuse or neglect ([The Care Act, 2014](#))

### **Our commitment:**

Groundlings Theatre Trust believes that an adult at risk of harm should never experience abuse of any kind. We have a responsibility to promote the welfare of all adults at risk and to keep them safe. We are committed to practice in a way that protects them.

At Groundlings Theatre Trust we recognise that the welfare of the adult at risk is paramount.

All adults at risk, regardless of age, ability or disability, gender, racial heritage, religious belief, ethnic origin, sexual orientation/identity, marital or gender status have a right to equal protection from all types of harm or abuse. Some adults are additionally at risk because of the impact of previous experiences, their level of dependency, communication needs or other issues. We also recognise that ability and disability can change over time. Working in partnership with adults at risk, carers and other agencies is essential in promoting their welfare. We recognise the role and responsibilities of the statutory agencies in safeguarding adults and are committed to complying with procedures of the Local Safeguarding Adults Boards.

### **We will seek to keep adults at risk safe from harm by:**

- Valuing them, listening to and respecting them, keeping in mind the six principles of adult safeguarding;
- Empowerment: people being supported and encouraged to make their own decisions and informed consent.
- Prevention: doing our best to act before harm occurs.
- Proportionality: the least intrusive response appropriate to the risk presented.
- Protection: support and representation for those in greatest need.
- Partnership: local solutions through services working with their communities.
- Accountability: accountability and transparency in delivering safeguarding.
- Appointing a Designated Safeguarding Officer (DSO) for adults at risk, and a lead trustee board member responsible for safeguarding.
- Adopting adults at risk protection and safeguarding practices through procedures and a code of conduct for staff, trustees and volunteers.

- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made.
- Recording and storing information professionally and securely.
- Sharing information about safeguarding and good practice with our partners, staff and volunteers via training, one-to-one discussions and information updates.
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving adults at risk, parents, families and carers appropriately.
- Abiding by the Care Act's (2014) "Making Safeguarding Personal" measures meaning wherever possible Groundlings Theatre Trust will discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of Groundlings Theatre where necessary.
- In the case that the adult is at risk of significant harm, we may override their consent to share information in order to keep them safe. This process is outlined in the flowchart below.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

***Procedure for adults at risk can be found in appendix 3.2***

## **Safer Recruitment**

The application of rigorous procedures for the recruitment of any staff, paid or voluntary, who come into contact with children can reduce the likelihood of allegations of abuse being made that are founded. As an absolute minimum, the following standards should be followed:

- a) All prospective workers (paid and unpaid) should complete an application form which asks for details of their previous employment and for the names of two referees including their most recent employer;
- b) Any gaps in employment will be fully explored;
- c) Prospective workers (paid and unpaid) who may undertake unsupervised activity with children or young persons should have a current Disclosure and Barring Service (formerly CRB) disclosure or agree to undertake one before they start work with Groundlings Theatre – anyone who refuses to do so should not be employed. Any disclosures shall be reviewed and risk assessed to deem if they are suitable to work with children;
- d) All prospective workers (paid and unpaid) should be interviewed to establish previous experience of working in an environment where there is contact with children and perceptions of acceptable behaviour;
- e) If working as part of an unsupervised regulated activity, a reference should be taken up with the person's last regulated activity in addition to the referees the person has elected. Nobody should start work before references have been received. Referees should receive a clear outline of the nature of the prospective role and should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment – this will identify if previous safeguarding concerns reported;
- f) All appointments to work with children should be subject to an agreed probationary period;
- g) staff and volunteers should be clear about expected codes of conduct and behaviour, clarity about how this will be monitored and what actions that will be taken if codes of conduct are breached;
- h) These guidelines should be available to everyone and fully discussed as part of an induction process

## **Disclosure And Barring Service (DBS) Checks**

The Disclosure and Barring Service (DBS) exists to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children and young people. 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.

### **Who requires a DBS?**

Disclosure and Barring Service (DBS) disclosures are required for any staff member (paid or unpaid) who will be working in a regulated activity. For Groundlings Theatre work with children, the only relevant regulated activity (usually unsupervised): to teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being. This work is a Regulated Activity only if done regularly or intensively, which means being carried out by the same person frequently (once and week or more often), or on 4 or more days in a 30-day period. A person who managed or supervises a regulated activity is also counted as undertaking a regulated activity. If the person is providing occasional or temporary services they are not in a regulated activity.

### **How often should a DBS be processed?**

- DBS checks should be processed internally every 3 years.
- If a staff member has a DBS check processed by another organization, we will accept it if it has been processed in the last 12 months. Once 12 months is up, a internal DBS check will need to be processed.
- A record should be kept for each staff member containing the level of DBS required and the date it was processed.
- Christine Allison is able to process DBS checks on behalf of Groundlings Theatre Trust.

**Please see appendix 4. for further details on check levels and the definition of a regulated activity.**

## **Photography and Video**

Parental/guardian consent for photography or video recording of any child is obtained via consent forms handed out prior to productions and activities.

Photographs or videos of children and young people will be stored on a secure server that is only accessible by Groundlings Theatre staff.

Please see separate policy for more information.

## **E-Safety**

- a) Be aware of the age restrictions for social networking sites, most sites enforce the rule that persons must be 13 or over to use their sites.
- b) Be aware that emotional abuse and bullying can take place on the Internet, mainly within social networking sites
- c) Conduct yourself as you would in face to face conversations and be aware that how you say things in person may not come across in the same way online
- d) Photographs of children and young persons should only be uploaded to social networking sites once permission has been obtained from both the person in question and the written permission of their parents or guardian.
- e) Staff members and volunteers should not criticise or discipline children or young persons on social networking sites or in private online conversations.
- f) If you feel concerned about how a child is trying to contact you, or you are concerned about an online interaction between a staff member / volunteer and a young person then tell this to the Designated Safeguarding Officer, or if not immediately possible the Theatre Manager and then seek to the Designated Safeguarding Officer when suitable.

### **Implementation Checklist**

These child protection procedures will only be effective if all staff and volunteers involved with Groundlings Theatre Company own and understand them. This checklist is designed to help each individual to go through that process.

<b>Implementation</b>	<b>Completed + Date</b>
Designated child protection officer (CPO) identified	Completed
Copy of child protection policy and procedures received	Completed
Understanding of what to do if they have concerns about a child	Completed
For all staff and volunteers who have contact with children, enhanced DBS in place before starting unsupervised work	Completed and ongoing
For all staff and volunteers, copy of health and safety guidelines issued	Completed and ongoing

## **Who to Contact**

### **The Groundlings Theatre Trust:**

Executive & Creative Director

*Name:* Tobias Robinson

*Contact Email:* tobias.robinson@groundlings.co.uk

Lead Trustee for Safeguarding:

*Name:* Chris Allison

*Contact Email:* Please contact the theatre office for direct contact information

Designated Safeguarding Officer:

*Name:* Tobias Robinson

*Contact Email:* tobias.robinson@groundlings.co.uk

### **Portsmouth Multi Agency Safeguarding Hub (MASH):**

Portsmouth MASH (Multi Agency Safeguarding Hub)

*Email:* mash@portsmouthcc.gov.uk

*Tel:* 023 92688793

Emergency Duty Service

*Tel:* 0300 555 1373 (Out of Office hours)

### **Portsmouth Safeguarding Children Board Locality Teams Contact Numbers:**

Portsmouth LADO (Local Authority Designated Officer)

*Email:* [Lado@secure.portsmouthcc.gov.uk](mailto:Lado@secure.portsmouthcc.gov.uk)

*Tel:* 02392 882500

### **Portsmouth Safeguarding Children Partnership**

*Website:* <https://www.portsmouthscp.org.uk/>

### **NSPCC Helpline**

*Helpline:* 0808 800 5000

## **APPENDIX 1. CODE OF CONDUCT FOR STAFF, VOLUNTEERS AND TRUSTEES**

All staff, volunteers and trustees will be expected to be aware of and follow Groundlings Theatre Safeguarding Policy and Operational Procedures.

All staff, volunteers and trustees will be expected to adhere to the below code of conduct.

Staff, volunteers and trustees will ALWAYS:

- i) Treat everyone with dignity and respect.
- ii) Set an example you would wish others to follow.
- iii) Treat all children and young people equally.
- iv) Plan activities that involve more than one other person being present, or in sight/hearing of others.
- v) Follow recommended ratios between adults and children/young people for meetings and activities.
- vi) Respect a child/young person's right to personal privacy.
- vii) Avoid unacceptable situations within a relationship of trust.
- viii) Allow children and young people to talk about any concerns they may have.
- ix) Remember someone else might misinterpret your actions, no matter how well-intentioned.
- x) Take any allegations or concerns of abuse seriously and refer immediately.

Staff, volunteers and trustees will NEVER:

- i) Form a relationship with a child/young person that is an abuse of trust.
- ii) Engage in inappropriate behaviour or contact - physical, verbal, sexual.
- iii) Make suggestive remarks or threats to a child/young person.
- iv) Use inappropriate language – writing, phoning, email or internet.
- v) Let allegations, suspicions, or concerns about abuse go unreported. On occasion, one-to-one contact will be unavoidable, in such cases:
  - a) Make sure it is for as short a time as possible.
  - b) Ensure you remain accessible to others.
  - c) Tell someone where you are going, what you are doing and why.
  - d) Try to move with the child/young person to areas where there are more people.
  - e) Try to avoid unnecessary physical contact.

## **APPENDIX 2. DEFINITIONS & SIGNS OF ABUSE**

In order to effectively protect children, young people and adults at risk, 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 / young person.*

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/young person when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children and young people 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 child 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 of 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/young person who has unexplained signs of pain or illness should be seen promptly by a doctor. Behaviour changes 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, for example 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 / young person and can manifest in the child/young person's behaviour or physical functioning.*

Emotional abuse can be difficult to measure, and often children, young people 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 and young people not being

allowed to mix/play with other children and young people. 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, eg, 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 involves the use of a child/young person for gratification or sexual arousal by a person for themselves or others.*

Adults who use children, young people 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 behaviour of children/young people/vulnerable adults which may cause you to become concerned, although physical signs can also be present. In all cases children/young people/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 (eg 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/young person 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.

## **Bullying**

*Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It's usually repeated over a long period of time and can hurt a child/ young person both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying.*

You can't always see the signs of bullying. And no one sign indicates for certain that a child's being bullied.

But you should look out for:

- belongings getting "lost" or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

## **Child sexual exploitation**

*What is child sexual exploitation?*

Child sexual exploitation (CSE) is a type of sexual abuse. Young people in exploitative situations and relationships receive things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities.

Young people may be tricked into believing they're in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Child sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

#### *Spotting the signs of child sexual exploitation*

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Young people who are being sexually exploited may:

- go missing from home, care or education
- be involved in abusive relationships, appearing intimidated and fearful of certain people or situations
- hang out with groups of older people, or anti-social groups, or with other vulnerable peers
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- be involved in petty crime such as shoplifting
- have access to drugs and alcohol
- have new things such as clothes and mobile phones which they can't or won't explain
- have unexplained physical injuries.

#### **Harmful sexual behaviour**

##### *What is harmful sexual behaviour?*

Children and young people who develop harmful sexual behaviour (HSB) harm themselves and others.

HSB can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- full penetrative sex with other children or adults.

Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than 2 years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled.

### *Spotting the signs of harmful sexual behaviour*

It's normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.

If you're unsure whether a child's sexual behaviour is healthy, Brook provide a helpful, easy-to-use traffic light tool. The traffic light system is used to describe healthy (green) sexual behaviours, potentially unhealthy (amber) sexual behaviours and unhealthy (red) sexual behaviours.

### **Radicalisation**

Groundlings Theatre recognises the positive contribution it can make towards protecting children and young people from radicalisation to violent extremism. NYT will continue to empower children and young people to create communities that are resilient to extremism and support the wellbeing of particular children and young people who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature including electronic material accessed via the internet and communication such as e-mail and text messages
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

If staff have any significant concerns about a child/young person beginning to support terrorism and/or violent extremism, they should discuss this with the Designated Safeguarding Officer or the Lead Trustee for Safeguarding immediately.

### **Female Genital Mutilation**

It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad or aid or abet someone to take a child out of the country to undergo the procedure – Female Genital Mutilation Act 2003. Despite the harm it causes, FGM practising communities consider it acceptable to protect their cultural identity. The age at which girls are subject to FGM varies greatly from shortly after birth to any time up to adulthood. The average age is

thought to be 6 – 12 years but it is also thought that the age at which girls are mutilated is dropping.

Although the age of the children and young people with whom Groundlings Theatre engages is such that they are not necessarily in the 'high risk' category for FGM, a child/young person may disclose that she is at risk of FGM, has suffered FGM or that she has a sister or family member who is at risk of mutilation.

Staff should be alert to the following indicators:

- The family comes from a community that is known to practise FGM
- A child/young person may talk about a long holiday to a country where the practice is prevalent
- A child/young person may confide that she or a sister or family member is to
- have a 'special procedure' or to attend a special occasion
- A child/young person may request help from a teacher or another adult
- Any girl/young woman born to a woman who has suffered FGM or has a sister or relative who has been subjected to FGM must be considered to be at potential risk

Any information or concern about a child/young person or member of her family being at risk of FGM must be reported to the Designated Safeguarding Officer or the Lead Trustee for Safeguarding as matter of urgency. This may be treated as an immediate child protection referral to the child/young person's home borough.

### **Other Types of Abuse:**

#### **Adults Financial or material abuse**

- including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Unexplained inability to pay for bills or shopping etc., withdrawal of large sums of money, inability to account for spending, worrying about money, money or possessions going missing.

#### **Discriminatory abuse**

- including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime
- The person being used as a scapegoat, denial of access to services, being treated differently to other service users, being subject to discriminatory descriptions or jokes, lack of respect for religious faiths.

#### **Institutional abuse:**

- abuse that takes place in a care home or establishment
- No flexibility in the bedtime or waking routine. Adults being left on the toilet or commode for long periods of time. Inappropriate care of possessions or living area.

A lack of clothes and possessions. Inappropriate use of medical procedures. People being spoken to, or referred to, disrespectfully.

**Domestic abuse:**

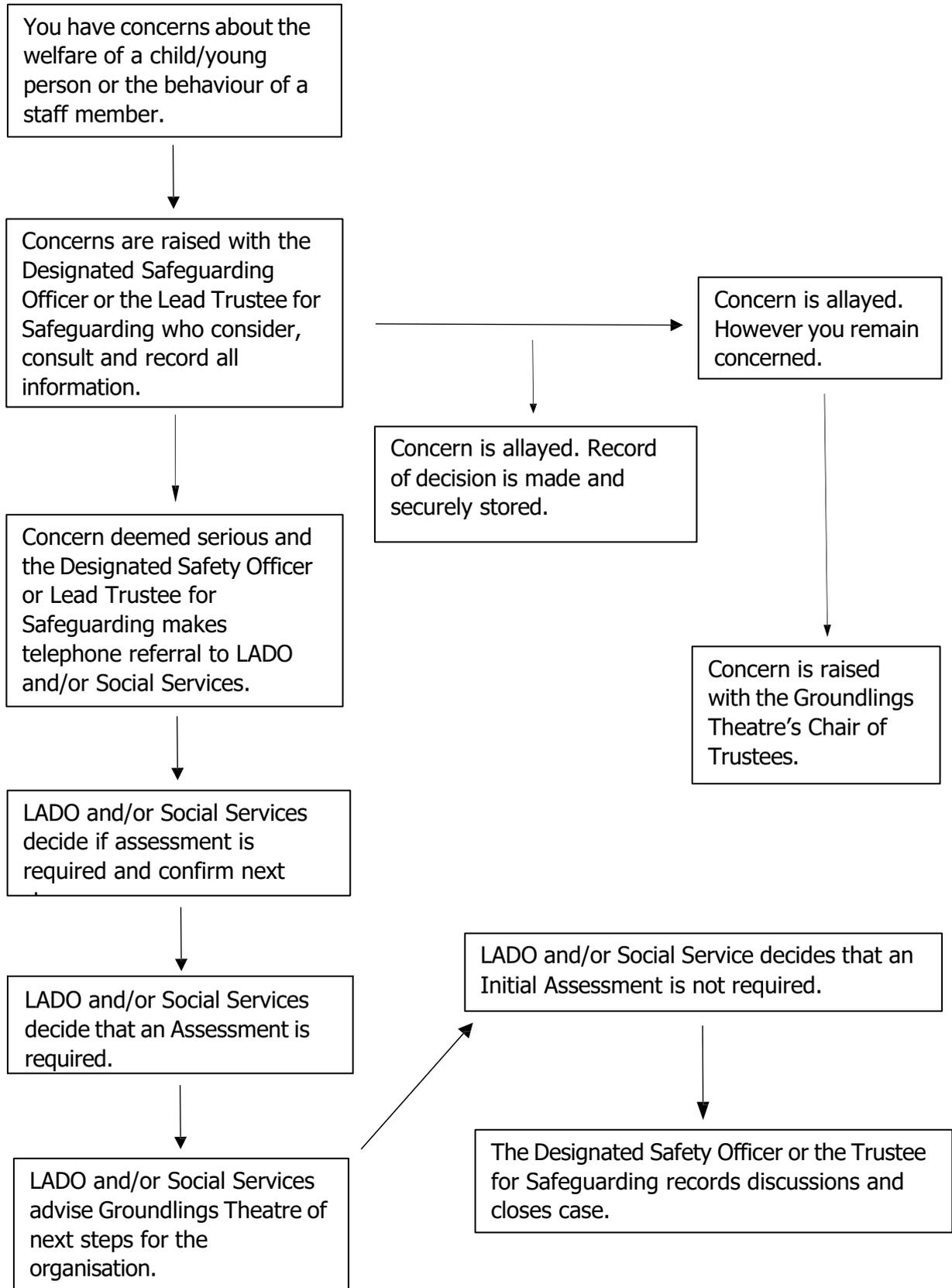
- controlling, coercive or threatening behaviour between family or those who are/ have been in an intimate relationship
- afraid or anxious to please their partner or family member, receive frequent, harassing phone calls, talk about their partner or family member's temper, jealousy, or possessiveness, be restricted from seeing family and friends, have limited access to money, credit cards, or the car, have very low self-esteem, show major personality changes

**Non-recent abuse:**

- an adult who suffered abuse as a child

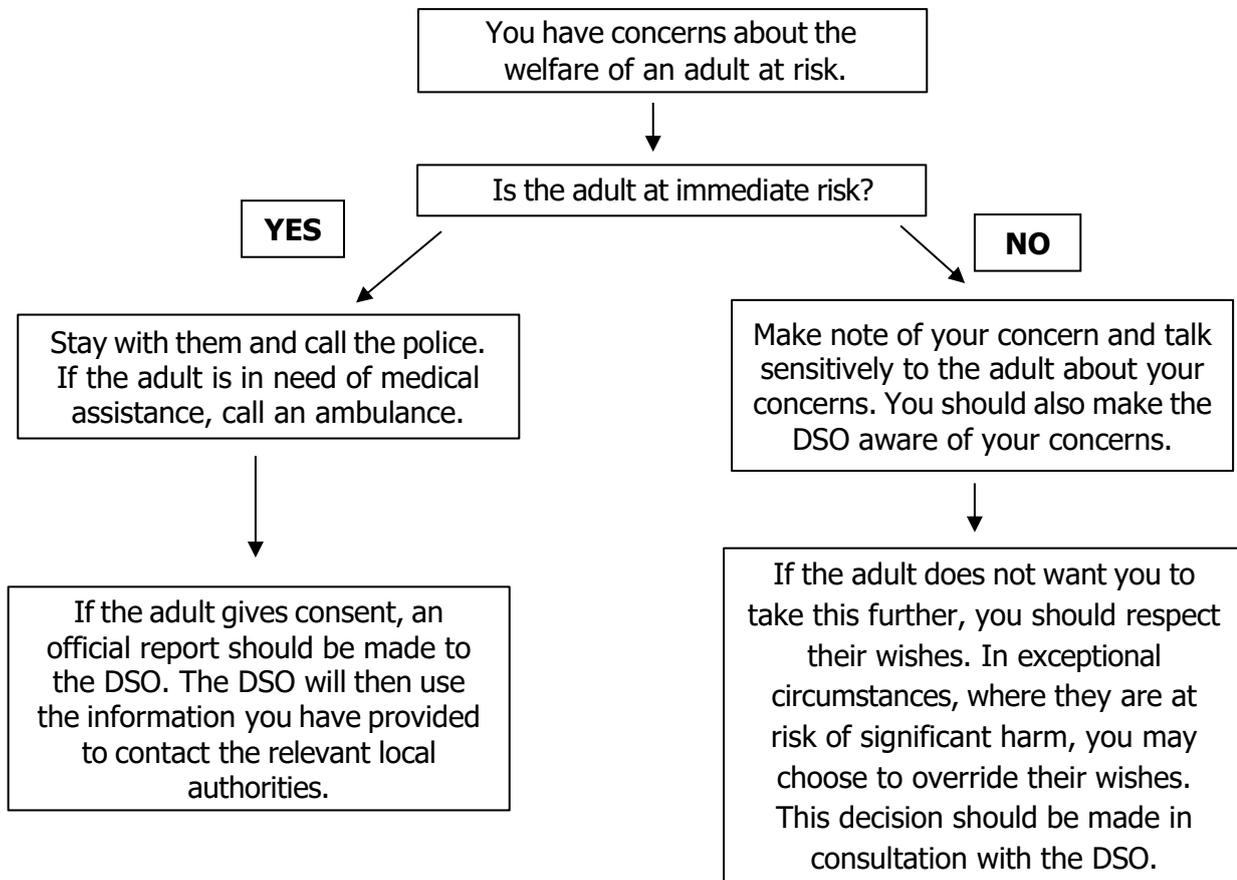
### APPENDIX 3. REPORTING PROCEDURES FLOWCHART

a) This quick guide flowchart is designed to advise on the most appropriate action to be taken if you suspect abuse, poor practice or breach of conduct towards a child:



b) **This flowchart sets out the procedure that should be taken if a member of staff, trustee or a volunteer working on behalf of Groundlings Theatre Trust has a concern about an Adult at Risk**

The decision will then be made as to whether there is still a concern.



**The decision will then be made as to whether there is still a concern.**

**Concerned**

The DSO will make an official report to the Multi-agency safeguarding adults team.

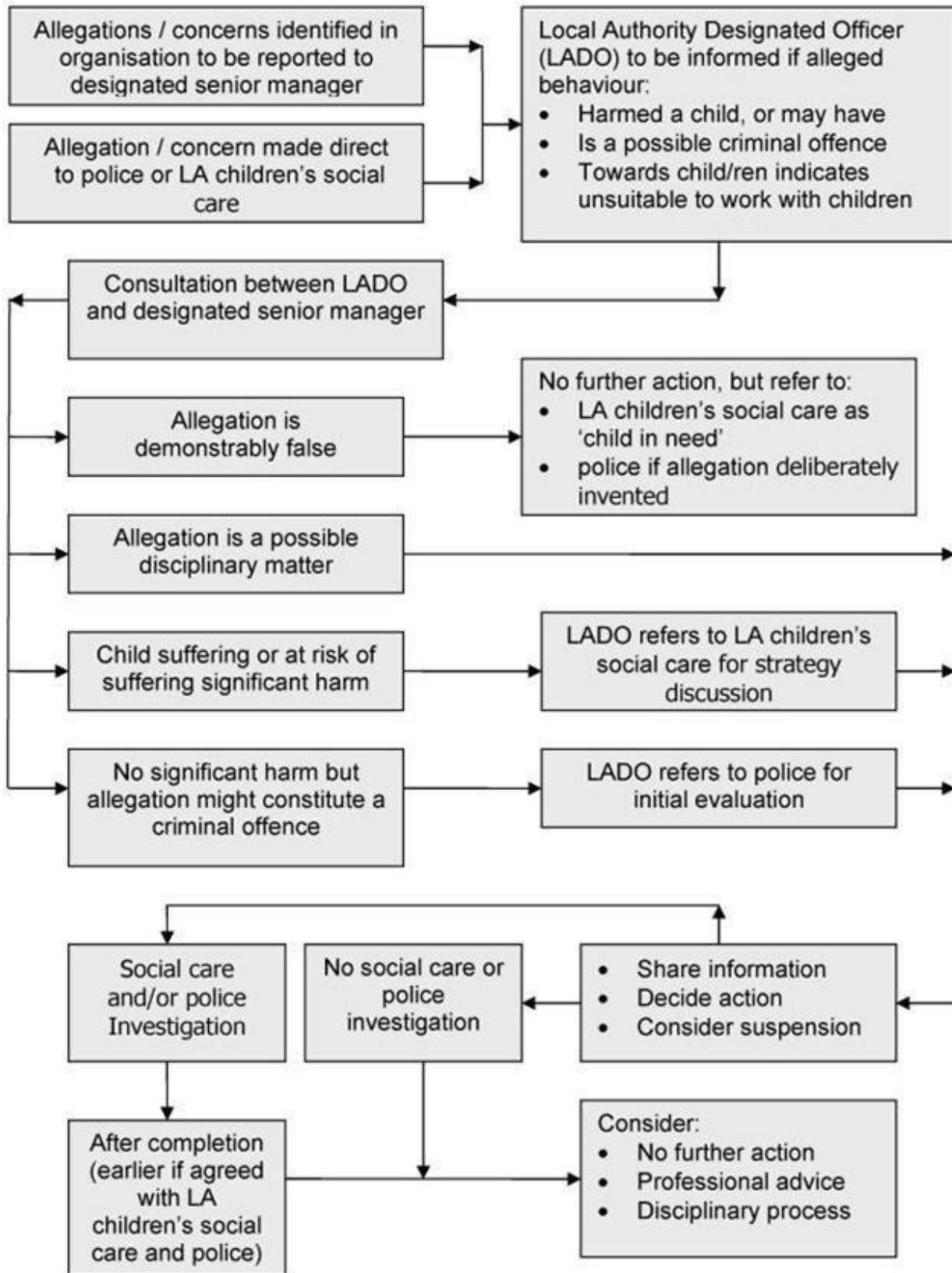
Possible outcomes could be:

- Criminal proceedings
- Police enquiry
- Adult Care Safeguarding Assessment
- Disciplinary Measures
- Case management

**No longer concerned**

No further action will be taken to escalate this report however the record will be kept and staff remain vigilant

c) **REPORTING FLOWCHART FOR ALLEGATIONS MADE AGAINST STAFF**



## Appendix 4. DBS CHECKS

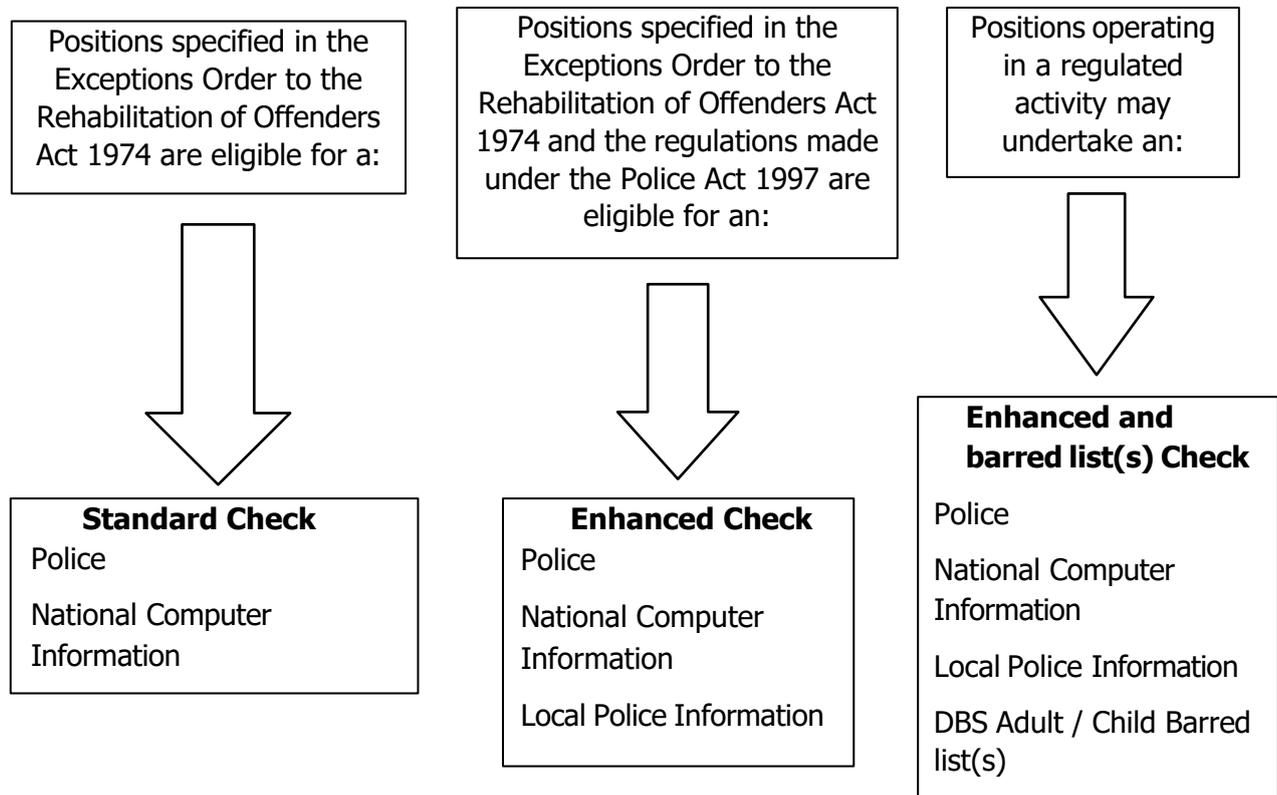
### A. Check levels

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 check:

1. 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 Exceptions Order to the Rehabilitation of Offenders Act 1974.
2. Enhanced checks reveal the same information as Standard Checks but also check against information held by local police forces (for instance, relevant on- going investigations). To be eligible for an Enhanced Check the position must be specified in the Exceptions Order to the Rehabilitation of Offenders Act 1974 AND regulations made under the Police Act 1997, which includes work with children.
3. 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' (see below). To be eligible for an Enhanced Check with Children's and/or Adults Barred list check the position must meet the above criteria and fall within the DBS definition of 'Regulated Activity' (see below).

The minimum age at which someone can apply for a DBS check is 16. Organisations wishing to undertake a check should choose between three routes depending on the nature of the role:



## B. Regulated activity definition

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.

The DBS has recently reduced the scope of Regulated Activity, so that some roles that previously needed a barred list check no longer do so. However, those posts taken out of Regulated Activity remain eligible for Enhanced Checks. In reducing the scope there is now a greater role for organisations in deciding whether a person is a suitable candidate for a particular role. To do this effectively they must also use other safeguarding measures rather than rely on legal provisions alone.

Activities that place a staff member in Regulated Activity with Children are:

- i. *Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;*
- ii. *Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers;*
- iii. *Relevant personal care, for example washing or dressing; or health care by or supervised by a professional, even if done once.*
- iv. *Registered childminding; and foster-carers.*

Work under (i) or (ii) 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). Activity under (iii) and (iv) does not have a frequency restriction and is Regulated Activity even if performed only once.

Broadly speaking, the new definition of Regulated Activity relating to children no longer includes certain activities done on an irregular or ad-hoc basis or some activities properly supervised by someone who themselves is in Regulated Activity.

## C. DBS Policy

All Groundlings Theatre staff and volunteers who are working unsupervised with young people or adults at risk must have a current and valid DBS check. DBS's must be at the enhanced level and for the correct workforce. These will be processed by Groundlings Theatre Trust once a member of staff or volunteer has started work.

Groundlings will require fresh DBS checks every three years

If a staff member or volunteer already holds a DBS certificate, we will only accept it if:

- i. It is an enhanced DBS check with the correct workforce **AND** It was processed in the last 12 months
- ii. the person is on the update service

## **What level of DBS is needed?**

There are different 'levels' of DBS checks that can be completed. For example:

- Basic (criminal history check available for all individuals and employers in the UK)
- Standard (spent and unspent convictions, cautions, reprimands and final warnings)
- Enhanced, no Barred Lists, Child Workforce (role specific)
- Enhanced, no Barred Lists, Adult Workforce (role specific)
- Enhanced Checks with either or both Barred Child + Adult Lists

What check a staff member/ volunteer requires depends on what activities they will be supporting in their role. It is worth noting that all standard and enhanced checks can only be done through an employer.

## **Previous Criminal Convictions**

The Rehabilitation of Offenders Act 1974 enables some criminal convictions to become 'spent', or ignored, after a 'rehabilitation period'. A rehabilitation period is a set length of time from the date of conviction. After this period, with certain expectations, an ex-offender is not normally obliged to mention their conviction when applying for a job or obtaining insurance, or when involved in criminal or civil proceedings.

As an organisation working with young people and adults at risk, many roles and positions for staff and volunteers qualify for DBS (Disclosure and Barring Service) checks which provide us access to sensitive criminal record information about individuals. As an organisation assessing applications' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service, we are committed to treating all applicants fairly.

## **Self-disclosure**

When applying for a role, applicants can self-disclose any previous convictions. Additionally, at interview, we will ensure that there is an opportunity for an open and measured discussion to take place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment or volunteering position.

Disclosing a previous conviction will not immediately result in the withdrawal of employment. Cases will be assessed individually by the board of trustees and the designated safeguarding officer.

## **DBS Results**

When the DBS check is complete, the applicant will receive the certificate in the post to their home address that was stated in the application form. When the certificate is received, we recommend keeping it in a safe place in case it needs to be seen in the future.

If a criminal record is not found, the certificate will state that there is 'no information'.

Whatever the outcome of a DBS check the certificate must be shown to the senior member of staff or the trustee with HR responsibilities so that the certificate number and date can be recorded.

If a DBS check highlights a criminal record but the candidate hasn't disclosed this previously, the senior member of staff, the trustee with HR responsibilities and the safeguarding officer will discuss the exact nature of the offence in order to make a decision.

The presence of a criminal record does not immediately mean the offer of employment will be withdrawn, a decision will be made on the basis of the relevance of convictions, judged against the following criteria:

- The seriousness of the offence and its relevance to Groundlings Theatre activities
- The length of time since the offence occurred
- Whether the offence was one-off or part of a history of offending
- The circumstances which led to the committing of the offence
- Whether the applicant's personal circumstances have since changed
- Decriminalisation and remorse

## APPENDIX 5. Safeguarding incident report / Cause for concern form (MASTER)

- *This form is designed to report any safeguarding incidents or concerns.*
- *It should be completed by the worker who has been disclosed to, who witnessed the incident, was most directly involved or who provided first aid if relevant.*
- *Once completed it must be submitted as per the organisation's reporting protocols.*

Name of person completing this form:
Role & Contact Email:
Date form is completed:

### Details of child, young person or adult at risk:

Name:	Date of birth:
Contact number:	Gender:
Address:	Any further information that may be useful to consider:

### Parents/carers details:

Name:	Address:
Contact number:	Email address:
Have parents/carers been notified of the incident?: Yes / No	If yes, please provide details:

### Details of reportee:

Are you reporting your own concerns or responding to concerns raised by someone else?	Reporting my own concerns	
	Responding to someone else's concerns	

*If responding to someone else's concerns, please provide their details*

Name:	Relationship to child, young person or adult at risk:	
Email address:	Contact number:	

**Incident Details:**

Date/ Time:	Event or activity name (if applicable):
Location of incident:	
<p>Description of the incident or concern: (continue on separate sheet if necessary)</p> <p><i>(Include relevant information such as what happened and how it happened, description of any injuries sustained, behaviour witnessed and whether the information provided is being recorded as fact, opinion or hearsay)</i></p>	
<p>Child, young person or adult at risk account of the incident or concern: <i>(use their own words)</i></p>	
<p>Details of any previous concerns, incidents or relevant safeguarding records <i>(Please refer to date of record made):</i></p>	

Witness account of incident or concern: *(include further accounts on separate sheets as necessary. Include reference number on each accompanying account)*

**Details of any witnesses:** *(Use separate pages if necessary)*

Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person or adult at risk:	Contact details:
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**Details of any persons involved in the incident or alleged to have caused the incident, injury or presenting risk:** *(Use separate pages if necessary)*

Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person or adult at risk:	Contact details:
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**Outcome of incident & immediate actions taken:**

<ul style="list-style-type: none"> <li>Ambulance required? YES / NO</li> </ul>	Name of hospital / medical facility attended:
<ul style="list-style-type: none"> <li>First aid treatment provided? YES / NO</li> </ul>	Given by whom:
<ul style="list-style-type: none"> <li>Police / fire services attended? YES / NO</li> </ul>	Further details:

Any resulting change of plans or disruption to the event or activity, if applicable:

Further actions taken at time of incident:

Signed By Author:	Name:	Date:
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**Reporting to the Designated Safeguarding Lead (DSL):** *(to be completed by DSL)*

Date & time DSL notified of incident/concern:
Date & time this form passed on to DSL (if different from above):
DSL comments: <i>(actions taken / impact on rest of programme / external agency involvement / initial lessons learned / follow-up actions required):</i>

**External agency referral:** (tick box where relevant)

<b>Has the correct consent be gained for this concern to be raised further?</b>	
Yes / No	
<b>Police</b> Details of name of contact and advice received:	
<b>MASH report made?</b> Details of name of contact and advice received:	
<b>Other</b> Details of name of contact and advice received:	
Date/time report completed:	

Signed By DSL:	Name:	Date:
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**Follow-up action:**

Action:	Due date:	Whom responsible:	Sign if completed:

Please ensure that the report is emailed to Groundlings Theatre’s Lead Trustee for Safeguarding and Groundlings Theatre’s Designated Safeguarding Officer.

## APPENDIX 6. CHILD PERFORMANCE LICENSING

### Requirement to Licence

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 & 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. 1678, 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.

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

- **broadcast performances** (films, TV, video) covers performances that will be broadcast;
- **non-broadcast performances** (theatre, modelling) covers performance that are not broadcast.

It is the responsibility of Groundlings Theatre to establish contact with the relevant local authority 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 licence is not required, see EXEMPTION sections below.

The Children (Performances) 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 licence (between first and last performing day). Rehearsals are then subject to the same restrictions and conditions applicable to that licence 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. 5 days broadcast, 6 days theatre/other.

The Children (Performances) Regulations 1968 details the regulations of times and hours that children can perform. All categories of children's entertainment licensing, including both licence exemptions, are subject to these times and hours.

## **Chaperones**

All licensed children under the age of 16 need to be chaperoned in law while taking part in a performance. Chaperones act in loco parentis and should exercise the care which a good parent might be reasonably expected to give that child. Regulations require a ratio of 1 chaperone to 12 children.

A chaperone's first 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 his/her 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 his performance and is then handed into the care and control of his 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 Licence, at every place of performance where a child is present, for inspection by an officer of the Local Authority in whose area the performance takes place.
- Upon completion of the production, the daily record sheet/s should be stored at the Licence Applicant's main company address for a period of not less than 6 months after the final performance date for which the Licence has been granted.

Licensed Chaperones are approved by Local Authorities and will be familiar with the law regarding children in entertainment.

## **Child Performance Licence Exemptions**

**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 licence is not required for a child if:

- they perform for only 4 days in any 6 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 licence are still covered by Regulations 21, 22, 33 and 34 of the Children (Performances) Regulations 1968 covering the number of days on which children may perform and permitted hours of performance.

Groundlings Theatre will use the four day rule where appropriate; however this will only be done in consultation with relevant Local Authority Education Welfare Teams who will be required to know the names of the children taking part in the production, and the production dates.

*Please see the following page for the Performance Timetable Requirements.*

## Performance Timetable Requirements

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

<b>Performances (same nature)</b>	2 per day	1 Performance & 1 rehearsal OR 2 performances
<b>Performances per week</b>	Max. 6 days per 7 day week	Max. 8 consecutive weeks requires 2 week interval before performing again in ANY production
<b>Time gap between performance days</b>	14 Hours must elapse between the end of the previous days performance and the beginning of the following days performance	
<b>Performance Times</b>	Max. 3 hrs 30 mins	Including breaks
<b>Appearance in Performance</b>	Max. 2 hrs 30 mins	Aggregated
<b>Intervals</b>	1.5 hours minimum	Between 2 performances OR 1 performance & 1 rehearsal
<b>Exception to Intervals (in any week)</b>	On not more than 2 days minimum of 45 minutes interval between performances and/or rehearsals. Maximum 6 hours at place of performance	
<b>School Day</b>	Attending school after the morning session	1 performance Or 1 rehearsal
<b>Performance Hours</b>	Age 12 & Under:	Age 13 and Over:
<b>Earliest arrival</b>	7 am	7 am
<b>Latest Departure</b>	10pm	11.00pm
<b>Exception (1)</b>	10.30 pm	11.00 pm
<b>Exception (2)</b>	Not late than 11 pm on not more than 3 evenings per week, provided that he is not so present on more than 8 evenings in a period of 4 consecutive weeks	
<b>Medical (1)</b>	YES (period longer than 1 week)	Performing over 6 consecutive days
<b>Medical (2)</b>	No (period longer than 1 week)	Performing under 6 consecutive days
<b>Arrangements for getting home</b>	Applicant shall ensure that suitable arrangements (having regards to the child's age) are made for the child to get to his home or other destination after the last performance or rehearsal or the conclusion of any activity on any day	