

<b>Name of Policy:</b>	East London Theatre School (ELTS) Safeguarding Policy & Procedures
<b>Effective Date</b>	December 2021
<b>Date of next review:</b>	December 2022
<b>Overview</b>	<p>ELTS has a strong commitment to the social, emotional, and creative development of young people, children, and vulnerable adults (YP/C/VA).</p> <p>There are additional guidelines that support the safeguarding of ELTS members and staff. These are referred to in this policy and included in staff and members' Welcome Packs'.</p>

## CONTENTS

### CONTENTS

Key safeguarding personnel at ELTS	p4
ELTS Commitment	p4
Aims	p4
Definition of safeguarding	p5
Legislation & Statutory Requirement	
p5	
Legislation & Statutory Requirement continued	p6
Related Policies and Guidance	p6
Key responsibilities and Immediate Action	p6
Designated Safeguarding Team and their roles	p7
Staff and Volunteers responsibilities	p7
Children/Young people's responsibilities	p7
Parents/Carers/Guardians responsibilities	p8
Recognising types of abuse and neglect	p8
Safeguarding and Child Protection procedures	p9
Record keeping	p10
Multi Agency working	p10
Confidentiality and Sharing	p10
Complaints	p11
Staff/Volunteer Induction	p11
Working practice	p11
Staff support	p11
Staff recruitment	p12
Allegations against staff	p12
Equality statement	p12
Safeguarding and Additional Educational Needs	p13
Peer to Peer abuse	p13
Gangs/Exploitation	p13
Online Safety	p14

The artistic programme and Keeping Safe

Security on Site p15

Appendix 1: Types of Abuse p16

Additional notes p17

Appendix 2: Specific Safeguarding issues p18-22

Appendix 3: Safer recruitment p23

Appendix 4: Allegations made against staff p23-27

Appendix 5: Online Safety and Mobile technology p28

Appendix 6: National Support contact details p29-30

## Key safeguarding personnel

### Designated Safeguarding Officer:

Darnell Shakespeare, Artistic Director, ELTS

[darnshakes@gmail.com](mailto:darnshakes@gmail.com)

### Safeguarding Support Officer

Jan Sharkey-Dods, General Manager, ELTS

[eastlondontheatreschool@gmail.com](mailto:eastlondontheatreschool@gmail.com)

## ELTS Commitment

ELTS is committed to providing a safe and secure environment for children, young people, vulnerable adults staff and visitors and promoting an environment where everyone will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.

Our policy applies to all staff, volunteers working for ELTS and takes into account statutory guidance provided by the Department for Education,

We will ensure that all parents/carers/guardians are made aware of our responsibilities with regard to child protection procedures and how we will safeguard and promote the welfare of their young people/children/vulnerable adults through the safeguarding procedures and practices.

## Aims

ELTS aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote the welfare of staff/C/YP/VA
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are trained in recognising and reporting safeguarding issues.

## Definition of Safeguarding

"Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety." (Inspect safeguarding in early years, education and skills, Ofsted, 2021).

All safeguarding policies will be reviewed on an annual (minimum) basis by the Artistic Director and General Manager in consultation with Newham's' Safeguarding team. The Designated Safeguarding Officer will ensure regular reporting on safeguarding activity and systems in school to the appropriate agencies and partners affected.

There are four main elements to our child protection policy:

- **Prevention** (e.g. positive, supportive, safe culture).
- **Protection** (by following the agreed procedures, ensuring all staff / volunteers are trained and supported to respond appropriately and sensitively to safeguarding concerns).
- **Support** (for all members, parents/carers/guardians/volunteers and staff, and where appropriate specific intervention for those who may be at risk of harm).
- **Working with other agencies** (to ensure appropriate communications and actions are undertaken).

The procedures contained in this policy apply to all staff (including temporary staff and volunteers)

## Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education (Sept 2021) and Working Together to Safeguard Children, and the Governance Handbook.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

## Related policies and Guidelines

This policy links closely with ELTS Anti-Bullying and Behaviour Policy

## Key responsibilities and immediate action

All adults working at ELTS (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected abuse or neglect to a member of the Designated Safeguarding Officer. If in the instance they are not available, report such concerns to Newham's Safeguarding Team

- o 020 3373 4600 during office hours (Monday to Thursday, 9am to 5.15pm or Friday 9am to 5.00pm)
- o 020 8430 2000 at any other time.

The Designated Safeguarding Officer to be copied in on all referrals made to the duty desk at the relevant Social Services team.

## The Designated Safeguarding Team (DST)

The DST team are the focal point for staff/visitors/volunteers/ members/carers/guardians/parents who have concerns about an individual's safety and the first point of contact for external agencies that are pursuing Child Protection investigations.

### Designated Safeguarding Officer:

Darnell Shakespeare, Artistic Director, ELTS  
darnshakes@gmail.com

### Safeguarding Support Officer

Jan Sharkey-Dods, General Manager, ELTS  
eastlondontheatreschool@gmail.com

- The DST will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

### **It is the role of the DST to:**

- Act as the central contact point for all staff/Volunteers/members/parents/guardians/carers to discuss any safeguarding concerns.
- Maintain ELTS's confidential recording system for safeguarding and child protection concerns.
- Coordinate safeguarding action for individual children.
- In the case of Children Looked After the DST should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DST liaising closely with the designated teacher).
- Ensure that locally established referral procedures are followed as necessary, dependent on borough being contacted.
- Represent, or ensure a member of ELTS is appropriately represented at partners's safeguarding meetings.

## Members of Staff and Volunteers

### **All members of staff and Volunteers have a responsibility to:**

- Provide a safe environment in which children can learn.
- Be prepared to identify ELTS members who may benefit from early support/early intervention.
- Understand the early support/early intervention process and their role in it.
- Understand ELTS safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Know what to do if a member tells them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of members who may be in need of help or protection.
- Be aware which member has given Consent for their images to be used on ELTS social media

## Children and Young People

### Whilst at ELTS members have a right to:

- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.
- Feel safe and respected

## Parents and Carers

### Parents/carers have a responsibility to:

- Understand and adhere to the relevant policies and procedures.
- Talk to their C/YP/VA about safeguarding issues & support ELTS in their safeguarding approaches.
- Identify behaviours which could indicate that their C/YP/VA is at risk of harm including online and seek help and support from ELTS, or other agencies.

Parents/guardians/carers receive ELTS's Keeping Safe Practise in their C/YP/VA Welcome Pack. They can request a full copy of the Policy from ELTS.

## Recognition and Types of Abuse and Neglect

All ELTS staff/Volunteers should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

*SEE APPENDIX 1 FOR FURTHER DEFINITIONS FOR EACH CATEGORY.*

They are aware that abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness.

The warning signs and symptoms of abuse and neglect can vary in each case. C/YP/VA also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

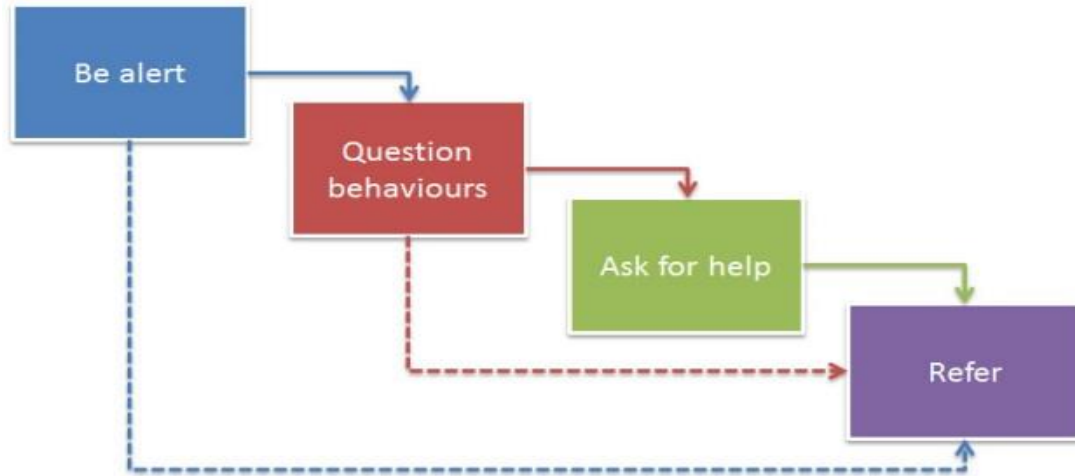
Parental/Carer/guardian behaviours may also indicate abuse or neglect, so ELTS staff and volunteers should also be alert to parent-C/YP/VA interactions or concerning behaviours; this could include parents/guardians/carers who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the C/YP/VA and their family. It is important to recognise that a warning sign doesn't automatically mean there is abuse.



## Safeguarding and Child Protection Procedures

All members of ELTS are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially. If a member is in immediate danger or is at risk of harm, a request for support should be made immediately to Newham's Children's Social Care Services and/or the police.

The DST may seek advice or guidance from the relevant borough's early support/early intervention service or MASH team before making a decision regarding next steps. They may also seek advice or guidance from a duty social worker.

Where a member is being offered or receiving early support/early intervention, staff/volunteers will be supported to understand their role. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

The DST will keep all early help cases under constant review and consideration will be given to a request for support to the relevant social care team if the situation does not appear to be improving or is getting worse.

All staff are aware of the process for making requests for support referrals for statutory assessments under the Children's Act 1989, along with the role they might be expected to play in such assessments (instructions on the safeguarding card).

**In all but the most exceptional circumstances, parents/carers/guardians will be made aware of the concerns for their C/YP/VA at the earliest possible stage.**

In the event of a request for support from social care being necessary, parents/carers/guardians will be informed and consent to this will be sought, unless there is a valid reason not to do so, for example if to do so would put a member at risk of harm or would undermine a criminal investigation.

In the absence of the availability of the DST to discuss an immediate and urgent concern, staff can seek advice from the relevant local safeguarding service or via consultation with a social worker. If anyone other than the DST makes a referral to external services, then they will inform the DST as soon as possible.

# Child Protection and Safeguarding Policy & Procedures

ELTS Staff and volunteers should feel able to check the progress of a case with the DS#T so that they can reassure themselves the member is safe and their welfare is being considered

If a members' situation does not appear to be improving, then the DST (or the person that made the request for support) will consider re-referral.

## Record Keeping

ELTS Staff and Volunteers will record any welfare concern that they have about ELTS member.

They will complete a new incident record (with a body map if injuries have been observed) and will alert without delay the relevant member of the DST and team. Records will be completed as soon as possible after the incident/event, using the members' words. If there is an immediate concern the member of staff should consult with a DST as this needs to take priority.

The Incident Forms will be kept in a password protected folder, with the DST only having access to them.

## Multi-agency Working

*ELTS recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.*

ELTS is not the investigating agency when there are child protection concerns. ELTS will however contribute to the investigation and assessment processes as required.

### **Confidentiality and Information Sharing**

ELTS recognises that all matters relating to child protection are confidential. The DST will only disclose information about a member to other members of staff on a 'need to know' basis.

All staff must be aware that they cannot promise a member to keep information confidential or 'secret' which might compromise the member's safety or wellbeing.

# Child Protection and Safeguarding Policy & Procedures

## Complaints

ELTS are transparent with members and carers/parents/guardians about their **Complaints Procedure ; this can be found in their Welcome Pack.**

All reported concerns will be taken seriously and considered within the appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff** . This can be found in the Staff/Volunteers Welcome Handbook.

## Staff Induction, Awareness and Training

ELTS staff and volunteers are provided with a copy of 'Keeping Safe Guidelines'. Policy and practice is addressed in their induction. They have access to the full policy on the website.

In addition, all staff members (including temporary staff & volunteers) will receive Prospero safeguarding online training

All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.

## Safe Working Practice

All members of staff are required to work within the **Behaviour Management and Physical Intervention Policies**

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the ELTS Online Safety.

## Staff Supervision and Support

Any member of staff/volunteer affected by issues arising from concerns for a members welfare or safety can seek support from the DST.

# Child Protection and Safeguarding Policy & Procedures

## Safer Recruitment

ELTS is committed to ensure steps are taken to recruit staff and volunteers who are safe to work with our members.

All staff/volunteers will require an Enhanced DBS, that is no more than 2 years old.

ELTS has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a C/YP/VA, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

If a DBS flags up any convictions or cautions concerning sexual, physical or mental abuse, drugs, violence ELTS will not employ them.

All staff/volunteers must sign A Self Declaration, saying they have/have not been cautioned or convicted of the offences listed above.

All staff/volunteers must complete Prospero's Online Safeguarding awareness training.

All staff/volunteers must attend the induction session.

## Allegations Against Members of Staff and Volunteers

ELTS recognizes that it is possible for staff and volunteers to behave in a way that might cause harm to members . Such allegations should be referred immediately to the Artistic Director or DST lead.

See Appendix 4

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously.

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*When in doubt – consult*

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## Equality statement

Some members have an increased risk of abuse, and additional barriers can exist for some with respect to recognising or disclosing it.

We are committed to anti-discriminatory practice and recognise members' diverse circumstances. We ensure that all have the same protection, regardless of any barriers they may face.

We give special consideration to members who:

- Have additional educational needs (AEN), health conditions or disabilities.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing from education.

# Child Protection and Safeguarding Policy & Procedures

## Safeguarding Children with Additional Educational Needs (AEN), Health Conditions and Disabilities

ELTS acknowledges that members with AEN, health conditions and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.

ELTS will ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with AEN, health conditions and disabilities can be disproportionately impacted by safeguarding concerns such as bullying.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with Special Educational Needs (SEN) and disabilities may not always outwardly display indicators of abuse.

### Peer on Peer Abuse

ELTS recognise that members are capable of abusing their peers. Peer on peer abuse can take many forms, including but not limited to, bullying, cyberbullying, gender-based abuse, sexually harmful behaviour, 'grooming', violence and the sharing of youth produced sexual imagery.

Staff and leadership are to be mindful that some potential issues may be affected by gender, age, ability and culture of those involved.

ELTS believes that abuse is abuse and it will never be tolerated.

### Gangs, County Lines, Violent Crime and Exploitation

ELTS recognises the impact of gangs, county lines, violent crime and criminal exploitation

All staff /volunteers recognise the need to be vigilant for the signs that may include, but not exclusively:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- Increased absence from school.
- Change in friendships/relationships with others/groups.
- Significant decline in performance.
- Signs of self-harm/significant change in wellbeing.
- Signs of assault/unexplained injuries.

# Child Protection and Safeguarding Policy & Procedures

## Online Safety

ELTS knows that the use of technology presents opportunities, challenges and risks to C/YP/VA.

The DST Lead has overall responsibility for online safeguarding within ELTS.

The issues can be broadly categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material
- **contact:** being subjected to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

ELTS recognises the specific risks that can be posed by mobile phones and cameras, especially when making and platforming creative work.

## Use of images

All ELTS members sign a form to give/or not their consent for their images to be used for publicity and reporting purposes. They are also asked if partners can use their image/footage.

The under 18's must get a parent/carer/guardian to sign/or not the consent form

There is one member of ELTS staff that is the designated photographer. They upload images on a safe cloud, accessible to ELTS AD and GM only.

## The artistic programme and Keeping Safe

We recognise that ELTS play an essential role in helping members to understand and identify the parameters of what is appropriate behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Our artistic programme embraces opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that members have a range of contacts and strategies to ensure their own protection and that of others.

# Child Protection and Safeguarding Policy & Procedures

## Security on site

All members of staff / volunteers have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

ELTS Saturday is based at UEL. ELTS staff/volunteers will report any site concerns to their front desk staff team.

Visitors will be expected to sign in and out via the front desk visitors log. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

## Appendices

### Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Emotional abuse may involve:**

- Conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.



# Child Protection and Safeguarding Policy & Procedures

## Additional notes:

If a member discloses that they have witnessed domestic violence or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DST as a child protection concern.

We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, work or their peers.

Whilst the Sexual Offences Act 2003 recognises that mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes from it, any sexual activity between an adult and a young person under 16 is a criminal offence.

This acknowledges that this group of young people is still vulnerable, even when they do not view themselves as such. Where sexual activity involving a child under 16 is disclosed to a member of the Safeguarding Team, the professional must consider whether they should discuss the case with other agencies and whether they should make a referral to children's social care, discussing it with the DST if unsure how to proceed.

Where the sexual activity is known to be with an adult this must be referred to children's social care unless there are reasons to believe that the child is not suffering, and is not likely to suffer, significant harm. Any decision **not to do so** must be fully documented, giving detailed reasons. In all cases the professional should provide the child with information on staying safe and being healthy.

# Child Protection and Safeguarding Policy & Procedures

## Appendix 2: Specific Safeguarding Issues

### Youth produced sexual imagery

Sharing of nudes or semi nudes (formally known as 'Sexting') to be known as 'Youth produced sexual imagery'

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

Most young people aren't sharing sexual imagery of themselves.

The incident should be referred to the DST as soon as possible.

The DST should hold an initial review meeting with appropriate staff.

There should be subsequent interviews with the young people involved (if appropriate).

Parents/carers/guardians should be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

### Peer on Peer Abuse

Peer-on-peer abuse is when C/YP/VA abuse other C/YP/VA

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of obtaining sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals ( could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

If staff / volunteers have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

# Child Protection and Safeguarding Policy & Procedures

## Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

# Child Protection and Safeguarding Policy & Procedures

## Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DST. The DTL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

# Child Protection and Safeguarding Policy & Procedures

## So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff/ volunteers will be alert to the possibility of a member being at risk of HBA or already having suffered it. If they have a concern, they will speak to the DST, who will activate local safeguarding procedures.

## FGM: Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

## Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

# Child Protection and Safeguarding Policy & Procedures

## Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

If a member of staff /volunteer suspects that a pupil is being forced into marriage, they will speak to DST.

They will

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

# Child Protection and Safeguarding Policy & Procedures

## Appendix 3: Safer Recruitment and DBS checks – policy and procedures

### Appointing new staff/volunteers

- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant)
  - Assess progress and suitability on regular basis.
  - If ELTS has any safeguarding concerns regarding a member of staff/volunteer, they will immediately remove them for interaction with members.
  - ELTS may ask for a period of time to investigate before deciding next course of action.
  - If the staff/volunteer has been seen to cause harm to a member (physical. mental. sexual), they will be dismissed immediately, pending further enquires.

These to be carried out for staff/volunteers undertaking Regulated activity. This means a person who will be:

- Responsible, on a regular/ weekly basis for training, instructing, directing ELTS members,
- Carrying out paid, or unsupervised unpaid, work regularly/weekly at ELTS where that work provides an opportunity for contact with C/YP/VA

### Existing staff

If we have concerns about an existing member of staff's suitability to work with C/YP/VA, we will carry out

- all the relevant checks as if the individual was a new member of staff.
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, young person or vulnerable adult
- Where the individual has received a caution or conviction for a relevant offence.
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity alone.

# Child Protection and Safeguarding Policy & Procedures

## Appendix 4: Allegations of abuse made against staff/Volunteers

This section of this policy applies to all cases in which it is alleged that a current member of staff /volunteer has:

- Behaved in a way that has harmed a member or may have harmed a member
- Possibly committed a criminal offence against or related to a member
- Behaved towards a member in a way that indicates they would pose a risk of harm to ELTS members.

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that members is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Providing an assistant to be present when the individual has contact with children.
- . Redeploying the individual to alternative work within ELTS so that they do not have unsupervised access to members
- Moving the members where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

### Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)



# Child Protection and Safeguarding Policy & Procedures

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above,  
– the DST Lead and Artistic Director– will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.
  - Consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk, or there is evidence of a possible criminal offence
  - Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
  - Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
  - If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
  - If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
  - If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
  - Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
  - Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
  - Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- 
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
  - If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.
  - Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

## Timescales

# Child Protection and Safeguarding Policy & Procedures

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 20 working days.

## Specific actions

Action following a criminal investigation or prosecution

- The case manager will discuss with the Local Authority's Designated Officer (LADO) whether any further action, including disciplinary action, is appropriate and, how to proceed.

## Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed

- the individual resigns or otherwise ceases to provide their services,
- The DST Lead will discuss with the designated officer whether to make a referral to the DBS
- If the staff/volunteer has been sourced through another agency or partner. they will be informed of all actions

## Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work,

- The case manager will also consider how best to manage the individual's contact with ELTS members. and those who made the allegation, if they are still attending the school.

## Unsubstantiated or malicious allegations

- If an allegation is shown to be deliberately invented, or malicious, the ELTS AD, will consider whether any disciplinary action is appropriate against the member who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a member.

## Confidentiality

ELTS will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

ELTS will take advice from the local authority's designated officer, police and children's social care services as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a member involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

## Record-keeping

ELTS will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

Such records will include:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).
- If an allegation or concern is not found to have been malicious, ELTS will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.
- We will retain these records for 7 years from the date of the allegation.
- The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false,

## **Child Protection and Safeguarding Policy & Procedures**

unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious

# Child Protection and Safeguarding Policy & Procedures

## Appendix 5: Online safety and the use of mobile technology

We recognise the importance of safeguarding C/YP/VA from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, we aim to:

- Set clear guidelines for the use of mobile phones and ELTS lap tops
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

1. Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
2. Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or
  - a. exploit them for sexual, criminal, financial or other purposes
3. Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
4. Commerce – risks such as online gambling, inappropriate advertising, financial scams

To minimize the risks above we will:

- Educate members about online safety
- Keep personal information private
- Report any incidents of cyber-bullying or safeguarding concerns, ensuring members are encouraged to do so, including where they are a witness rather than a victim
- Staff / volunteers are allowed to bring their personal phones for their own use, but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

# Child Protection and Safeguarding Policy & Procedures

## Appendix 6: National Support

For staff /volunteers

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

Support for members

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

Support for Learning Disabilities/Additional Educational Needs

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankind.org.uk](http://www.mankind.org.uk)
- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Violence Against Women of Colour: [www.imkaan.org.uk](http://www.imkaan.org.uk)

Honour based Violence

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Sexual Abuse and CSE

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Healthy and Unhealthy Relationships: [www.respectnotfear.co.uk](http://www.respectnotfear.co.uk)
- Male Rape & Sexual Abuse: [www.survivorsuk.org](http://www.survivorsuk.org)
- The Havens: [www.thehavens.org.uk](http://www.thehavens.org.uk)

Online Safety

## Child Protection and Safeguarding Policy & Procedures

- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

### Radicalisation and hate

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

- **END** -