

## Learner Safeguarding Policy

Revised August 2017 (due for review August 2018, SH/WC)

- 1.1 **Introduction** - Everyone who participates in activities at Millennium Performing Arts (MPA) is entitled to do so in an enjoyable and safe environment. MPA has a moral and legal obligation to ensure that, when given responsibility for young people, all members of staff and volunteers provide them with the highest possible standard of care.
- 1.2 MPA aims to maintain an environment where staff, students and visitors feel included and welcome. This Policy outlines the steps taken to provide a safe learning environment at MPA, where everyone is expected to accept their responsibilities to safeguard learners from harm and abuse. This means following procedures to protect learners and report any concerns about their welfare to appropriate authorities. This Policy promotes good practice, providing learners with appropriate protection whilst in the care of MPA and providing a framework for MPA to use to help prevent safeguarding issues from occurring in the first place, and for dealing with such an issue, in the unlikely event that one does arise.
- 1.3 MPA will support staff and students by providing relevant training and have, as a part of this policy provided a clear procedure for them to follow, should they have any safeguarding concerns. The lead member of staff institutionally responsible for the operation of this policy is the Designated Safeguarding Officer (DSO).
- 1.4 **Definition** - a person is considered to be in particular need for safeguarding, for the terms of this policy if they are a student or staff member who is or appears to be:
- dependent on others to help them perform basic physical functions;
  - their ability to communicate with others is severely impaired;
  - there is a potential danger that their will or moral well-being may be subverted or overpowered;
  - they are a member, of an oppressed group;
  - they are, for whatever reason unable to protect themselves against significant harm or exploitation.
- 1.5 **Responsibilities and scope** - we have a responsibility under the Safeguarding Vulnerable Groups Act (SGVA 2006) as amended by the Protection of Freedoms Act 2012 (PFA 2012) to ensure, as far as is reasonably possible, that vulnerable groups are protected from harm. We also have a responsibility to protect our staff, students and volunteers against harm or unfounded allegations.
- 1.6 To achieve this aim, MPA will identify those who may have particular safeguarding needs, with an aim of ensuring that there are appropriate measures in place to support and protect them. This is most likely to be when a prospective student or staff member presents at Interview, or where a tutor is made aware of or has their own concerns about a student, whom they feel would meet the definition of 'vulnerable' as outlined above.
- 1.7 In accordance with this Act, MPA is committed to ensuring the following:

- The welfare of the learner is paramount
  - All learners, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity should be able to participate in performing arts in a secure and safe environment
  - Taking all reasonable steps to protect learners from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
  - All suspicions and allegations of poor practice or abuse will be taken seriously and responded to swiftly and appropriately
  - All MPA employees who work with learners will be recruited with regard to their suitability for that responsibility, and will be provided with guidance and/or training in good practice and learner protection procedures
  - Working in partnership with parents and learners, essential for the protection of learners
  - The implementation of MPA procedures should be regularly monitored and reviewed. Relevant policies should be reviewed every 3 years or whenever there is a major change in the organisation or in relevant legislation.
- 1.8 Designated Persons with safeguarding responsibility are identified at MPA reception and on signage around the building. In 2017/18 these are: Donald McLennan (Director); Sarah Hanson (Principal); Cedric Chapelin (Vice Principal); - all trained and qualified with Child Protection for Designated Persons Course (Level 3). Donald McLennan (Director) and Sarah Hanson (Principal) have a certificate of attendance WRAP training 01/12/2015 and annual updates for 2016 and 2017.
- 1.9 Procedures for minimising, assessing, and responding to risk - MPA aims to have procedures in place to minimise risk and as a part of this, to establish a culture in which the rights of all people are fully respected and protected. We will:
- Have a DSO who can support staff to carry out a detailed risk assessment and use this to decide on a plan of action for supporting and safeguarding the individual and all those concerned with them
  - Prevent unsuitable staff from joining the organisation through good recruitment and selection practice
  - Ensure that all potential students are emotionally robust and mature enough and suitable to undertake training through thorough assessment and selection practice
  - Support course eligibility and individual applications for Disabled Student Allowance
  - Maintain confidential records of the medical conditions of our staff and students and always have a first aider on site during operating hours
  - Ensure that staff and students are aware of the requirement to inform MPA if there are any changes to their circumstances which may affect their employment or place on a training course, e.g. a criminal conviction obtained once in post.
- 1.10 MPA will make all staff aware of the indicators of vulnerability and risk and the possible signs of abuse and equip them to respond quickly to concerns about actual, alleged, or suspected abuse and ensure that staff know how information about those with safeguarding needs should be handled and how to get support to access and manage risk (as guidance, MPA note that the following are regarded as poor practice and should be avoided by all personnel:

- unnecessarily spending excessive amounts of time alone with young people away from others
  - taking young people alone in a car on journeys, however short (if a case arises where it is impractical/impossible to avoid a certain situation e.g. such as transporting a young person in your car, the tasks should only be carried out with the full understanding and consent of the parent/carer and the young person involved)
  - taking young people to your home where they will be alone with you
  - sharing a room with a young person
  - engaging in rough, physical or sexually provocative games, including horseplay
  - allowing or engaging in inappropriate touching of any form that is not part of teaching a dance/ singing/ acting class
  - allowing young people to use inappropriate language unchallenged
  - making sexually suggestive comments to a young person, even in fun
  - reducing a young person to tears as a form of control
  - allowing allegations made by a young person to go unchallenged, unrecorded or not acted upon
  - doing anything of a personal nature that the young person can do for themselves)
- 1.11 If during your care you accidentally hurt a young person, the young person seems distressed in any manner, appears to be sexually aroused by your actions and/or if the young person misunderstands or misinterprets something you have done, report any such incidents as soon as possible to the designated person and make a written note of it.
- 1.12 If a risk is identified where it is felt by the person who first identified the risk, that more support is needed, they will in consultation with the DSO, complete a safeguarding Form.
- 1.13 The DSO, upon receiving the form will review it and where necessary arrange to carry out a risk assessment and use this to decide on a plan of action for supporting and safeguarding the individual and all those concerned with them. In most instances the DSO will include other relevant bodies to help determine the most appropriate course of action, e.g. the individual concerned, the Welfare Committee, the Board of Directors/ Senior Management Committee, and occasionally outside bodies, as appropriate. Where the concern relates to allegations of abuse involving a student or member of staff, or suspected terrorist activity, Senior Management will always be involved in the discussion.
- 1.14 **Safeguarding and risk assessment principles** - All activities will be carried out in accordance with the following good practice principles where possible:
- All staff and students must operate within an accepted ethical framework relevant to performing arts training and adhere to the high standards of MPA (as led by our values and mission statement)
  - It should be noted that it is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees or participants in performing arts to make judgments about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the learner
  - Any concerns to be reported to the DSO

- Staff and students are encouraged to always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- All young people are to be treated equally and with respect and dignity; their welfare should always be put first
- Staff are expected to maintain a safe and appropriate distance with students (e.g. it is not appropriate for staff to have an intimate relationship with a learner or to share a room with them)
- Staff should avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly. Physical contact can be appropriate so long as it is neither intrusive nor disturbing
- Parental consent (where required) should be obtained if students are involved in a performance or activity that takes them outside the confines of MPA premises and transport in a car is required
- Wherever students in mixed groups are taken away, they should always be accompanied by a male and female member of staff
- Where possible, MPA will gain additional parental consent if the students are to take part in class photos or video recordings
- Staff are required to be excellent role models for students; this includes not smoking or drinking alcohol in the company of young people
- Staff are encouraged to always give enthusiastic and constructive feedback rather than negative criticism
- MPA expects its staff to recognise the developmental needs and capacity of each young person and will not risk sacrifice welfare in a desire for personal achievements. This means avoiding excessive training or competition and not pushing them against their will
- Staff will keep a written record of any injury that occurs, along with details of any treatment given.

1.15 Risk assessment is a key tool to help MPA ensure that they meet safeguarding obligations towards both students and staff. It is also a means for helping to mitigate or remove potential risks that may prevent the maintenance of an inclusive environment. It may provide stimulus for MPA to consider alternative working practices too. All risk assessment will be carried out with the following principles in mind:

- Confidentiality – those identified as having safeguarding needs will know that information about them is managed appropriately, and there is a clear understanding of confidentiality and its limits among staff
- Participation– all those with safeguarding needs will be invited to participate, as far as is possible, in arriving at any decisions that involve them
- Dignity and respect – all those with safeguarding needs will be accorded the same respect and dignity as any other adult, by recognising their uniqueness and personal needs
- Equality and diversity – all those with safeguarding needs will be treated equally, and their background and culture will be valued and respected
- Independence – all vulnerable adults will have as much control as possible over their lives while being safeguarded against unreasonable risks
- Privacy – all those with safeguarding needs will be free from unnecessary intrusion into their affairs, and there will be a balance between the individual's safety and the safety of others
- Support – all those with safeguarding needs will be supported to maximise their ability to engage in the courses, study activities, and training on offer.

- 1.16 **Defining learner abuse** - Learner abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm, it commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a young person regardless of their age, gender, race or ability. Young people with disabilities may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse had occurred.
- 1.17 There are four main types of abuse, physical abuse, sexual abuse, emotional abuse and neglect. The abuser may be a family member, someone the young person encounters in residential care or in the community, including sports and leisure activities. Any individual may abuse or neglect a young person directly, or may be responsible for abuse because they fail to prevent another person harming the young person. Abuse in all of its forms can affect a young person at any age. The effects can be so damaging that if not treated may follow the individual into adulthood. Types of Abuse include:
- Physical Abuse: where adults physically hurt or injure a young person e.g. hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, and drowning. Giving young people alcohol or inappropriate drugs would also constitute young person abuse. This category of abuse can also include when a parent/carer reports non-existent symptoms or illness deliberately causes ill health in a young person they are looking after. This is called Munchausen's syndrome by proxy. In a performing arts situation, physical abuse may occur when the nature and intensity of training disregard the capacity of the learner's immature and growing body.
  - Emotional Abuse: the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the person's emotional development. It may involve telling a young person they are useless, worthless, unloved, and inadequate or valued in terms of only meeting the needs of another person. It may feature expectations of young people that are not appropriate to their age or development. It may cause a young person to be frightened or in danger by being constantly shouted at, threatened or taunted which may make the young person frightened or withdrawn. Emotional abuse in performing arts may occur when the young person is constantly criticised, given negative feedback, expected to perform at levels that are above their capability. Other forms of emotional abuse could take the form of name calling and bullying. Bullying may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are three main types of bullying. It may be physical (e.g. Hitting, kicking, slapping), verbal (e.g. Racist or homophobic remarks, name calling, graffiti, threats, abusive text messages), emotional (e.g. Tormenting, ridiculing, humiliating, ignoring, isolating form the group), or sexual (e.g. Unwanted physical contact or abusive comments). In performing arts bullying may arise when a parent or teacher pushes the young person too hard to succeed, or someone from a different group uses bullying behaviour.
  - Neglect occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the person's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Neglect in performing arts could occur when a teacher does not

keep the young person safe, or exposing them to undue cold/heat or unnecessary risk of injury.

- Sexual Abuse occurs when adults (male and female) use young people to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse and fondling. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse. In performing arts, activities which might involve physical contact with young people could potentially create situations where sexual abuse may go unnoticed, unless the teacher gives clear verbal instructions regarding situations where physical contact is involved. Also the power of the teacher over young students, if misused, may lead to abusive situations developing.

1.18 Indicators of Abuse - Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which an explanation seems inconsistent
- the young person describes what appears to be an abusive act involving them
- another young person or adult expresses concern about the welfare of a young person
- unexplained changes in a young person's behaviour e.g. Becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of adult's, particularly those whom a close relationship would normally be expected
- difficulty in making friends
- being prevented from socialising with others
- displaying variations in eating patterns including over eating or loss of appetite
- losing weight for no apparent reason
- Becoming increasingly dirty or unkempt
- signs of bullying include behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training
- an unexplained drop off in performance
- physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. On food, alcohol or cigarettes
- a shortage of money or frequents loss of possessions
- Internet Bullying: This is a modern day phenomena and hard to detect as it happens outside of the school jurisdiction
- Drug Abuse: Usually hard to detect, however behavioural changes or sunken eyes can be the first example of the learner in this situation
- Flat Issues: Dealt with by Safeguarding Officers
- Sleep Issues: This could be detected by tutors if they see a learner obviously looking tired and weary
- Poor Attendance: This would be highlighted at the weekly staff meeting on student support

- Radicalisation: Staff were informed of the danger of students becoming radicalised in any form. Information placed in the staff-room i.e. Prevent Duty Guidance, MPA risk assessment in regard to radicalisation, Safeguarding information Guidelines for MPA Staff.

1.19 It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of those working in MPA to decide that young person abuse is occurring. It IS their responsibility to act on any concerns. These concerns must be reported to the DSO.

#### 1.20 Responding to suspicions and allegations

1.20.1 It is not the responsibility of anyone working at MPA to decide whether or not young person abuse has taken place. However there is a responsibility to act on any concerns through contact with the appropriate authorities so that they can then make inquiries and take necessary action to protect the young person. This applies BOTH to allegations/suspicions of abuse occurring within MPA and to allegations/suspicions that abuse is taking place elsewhere. This section explains how to respond to allegations/suspicions.

1.20.2 Receiving Evidence of Possible Abuse - we may become aware of possible abuse in various ways. We may see it happening, we may suspect it happening because of signs such as those listed in this document, it may be reported to us by someone else or directly by the young person affected.

1.20.3 In the last of these cases, it is particularly important to respond appropriately. If a young person says or indicates that they are being abused, you should:

- Stay calm so as not to frighten the young person
- Reassure the young person that they are not to blame and that it was right to tell
- Listen to the young person, showing that you are taking them seriously
- Keep questions to a minimum so that there is a clear and accurate understanding of what has been said. The law is very strict and young person abuse cases have been dismissed where it is felt that the young person has been led or words and ideas have been suggested during questioning. Only ask questions to clarify
- Inform the young person that you have to inform other people about what they have told you. Tell the young person this is to help stop the abuse continuing.
- Safety of the learner is paramount. If the learner needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a young person protection issue
- Record all information
- Report the incident to the Person in Charge, the designated person at MPA.
- In all cases if you are not sure what to do you can gain help from the NSPCC 24 hour helpline (Tel No: 0800 800 500). [help@nspcc.org.uk](mailto:help@nspcc.org.uk) ChildLine 08001111, Greenwich Children's Services 0208 854 8888 (out of hours ) 0208 921 3172 or [MASH-referrals@royalgreenwich.gov.uk](mailto:MASH-referrals@royalgreenwich.gov.uk) Anti-Terrorist Hotline 0800 789321.

- 1.21 **Recording information** - To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions. Information should include the following:
- The learners name, age and date of birth.
  - Whether or not the person making the report is expressing their concern or someone else's
  - The nature of the allegation, including dates, times and any other relevant information
  - A description of any visible bruising or injury, location, size etc. Also any indirect signs, such as behavioural changes
  - Details of witnesses to the incidents
  - The learners account, if it can be given, of what has happened and how any bruising/injuries occur
  - Has anyone else been consulted? Has anyone been alleged to be the abuser? Record detail.
- 1.22 **Reporting the Concern** - All suspicions and allegations **MUST** be reported appropriately. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.
- 1.23 MPA expects its members and staff to discuss any concerns they may have about the welfare of a learner immediately with the DSO and subsequently to check that appropriate action has been taken. If the nominated Person in Charge is not available you should take responsibility and seek advice from the NSPCC helpline, the duty officer at your local social services department or the police. Telephone numbers can be found in your local directory.
- 1.24 Where there is a complaint against an employee or volunteer, there may be three types of investigation. Criminal in which case the police are immediately involved; Young Person protection in which case the social services (and possibly) the police will be involved; Disciplinary or misconduct in which case MPA will be involved. As mentioned previously in this document MPA are not young person protection experts and it is not their responsibility to determine whether or not abuse has taken place. All suspicions and allegations must be shared with professional agencies that are responsible for young person protection. NB: If there is any doubt, you must report the incident: it may be just one of a series of other incidences which together cause concern.
- 1.25 Any suspicion that a learner has been abused by a member of staff or a volunteer should be reported to the designated person for safeguarding who will take appropriate steps to ensure the safety of the learner in question and any other learner who may be at risk. This will include the following: MPA will refer the matter to social services department; The parent/carer of the learner will be contacted as soon as possible following advice from the social services department ; The Directors should be notified to decide who will deal with any media inquiries and implement any immediate disciplinary proceedings; if the designated person for safeguarding is the subject of the suspicion/allegation the report must be made to the Directors who will refer the matter to social services

- 1.26 Allegations of abuse are sometimes made sometime after the event. Where such allegation is made, you should follow the same procedures and have the matter reported to social services. This is because other learners in performing arts or outside it may be at risk from the alleged abuser. Anyone who has a previous conviction for offences related to abuse against children is automatically excluded from working with children.
- 1.27 Confidentiality - Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only in line with Data Protection law.
- 1.28 **Internal inquiries and suspension** - The DSO will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries
- 1.28.1 Irrespective of the findings of the social services or police inquiries, MPA Directors and Management Team will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision; especially where there is insufficient evidence to uphold any action by the police. In such cases MPA Directors and the Management Team must reach a decision based upon the available information which could suggest that on the balance of probability, it is more likely than not that the allegation is true. The welfare of the learner should remain of paramount importance throughout.
- 1.29 **Recruiting and Selecting Personnel** - It is important that all reasonable steps are taken to prevent unsuitable people from working with learners. This applies equally to paid staff and volunteers. To ensure unsuitable people are prevented from working with learners the following steps should be taken when recruiting:
- Controlling Access to learners - All staff and volunteers should complete an interview. Consent should be obtained from the applicant to seek information from the relevant safeguarding register/authority , The designated person for safeguarding will seek confidential references on applicants where necessary. Evidence of identity (passport or driving license with photo)
  - Interview and Induction - All employees and volunteers will be required to undertake an interview carried out to acceptable protocol and recommendations.
- 1.30 **Training** - In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:
- Analyse their own practice against what is deemed good practice, and to ensure their practice is likely to protect them from false allegations
  - Recognise their responsibilities and report any concerns about suspected poor practice and/or abuse
  - Respond to concerns expressed by a learner. Work safely and effectively with learners
- 1.31 MPA will also provide information to raise awareness to ensure that all staff understands what to do if a person covered by this policy is deemed to be at risk in some way.

- 1.32 **Additional specific considerations** - Use of Photographic/Filming Equipment in Performing Arts classes or in performance situations. There is evidence that some people have used performance situations as an opportunity to take inappropriate photographs or film footage of young people. All teachers should be vigilant and any concerns should be reported to the Person in Charge, the designated person at MPA.