

The Comedy School Young People and Vulnerable Adult Safeguarding Policy

Date of review: December 2024

Policy Statement on Safeguarding

The Comedy School (TCS) recognises that all people have the right to protection from abuse. TCS takes its responsibility to protect and safeguard the welfare of children and vulnerable adults very seriously.

This policy outlines:

- Steps taken to create safe environments at The Comedy School
- Ways to recognise safeguarding concerns for children and adults
- Reporting procedures for sharing concerns

TCS has a duty to make appropriate arrangements to safeguard and promote the welfare of children and vulnerable adults. Government guidance makes it clear that it is a shared responsibility, and depends upon effective joint working between agencies and professionals that have different roles and expertise. Safeguarding is the responsibility of all staff, freelancers and volunteers who, during the course of their engagement have direct or indirect contact with children and vulnerable adults, or who have access to information about them.

As a not-for-profit organisation working with young people, inmates and vulnerable adults this area of our operation is regarded with the utmost seriousness. We take responsibility for circulating our policy among staff, freelancers and volunteers and for ensuring that it is implemented properly.

This policy seeks to ensure that TCS undertakes its responsibilities with regard to protection of children and vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff, freelancers and volunteers in their practices and clarifies the organisation's expectations.

Key Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

- A safeguarding concern is when someone is currently in, or at risk of being in, a vulnerable or dangerous situation
- *Vulnerable* or *dangerous situations* are situations where abuse, harm or neglect might take place or are currently taking place.

Abuse is a form of maltreatment, a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. Abuse may take place by an adult, or adults, or another child, or children. It can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

- Additional categories now included are:
 - Bullying and cyber bullying
 - Financial (or material) abuse
 - Child Sexual Exploitation (CSE) – including grooming of children
 - Female Genital Mutilation (FGM)
 - Radicalisation
 - Trafficking
 - Domestic violence
 - Forced marriage
 - Self-harm

See Appendix A for potential indicators of abuse or neglect.

Definition of a child

A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

Definition of a vulnerable adult

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This may include a person who:

- Is elderly and frail due to ill health, physical disability and/or cognitive impairment
- Has a mental health needs including dementia or a personality disorder
- Has a physical disability and/or sensory impairment
- Has a learning disability, autism or both
- Has a severe physical illness
- Misuses substances including alcohol and/or drugs
- Is homeless

Roles and Responsibilities

TCS recognises that safeguarding is a collective responsibility that all staff and volunteers have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the recommended procedures.

TCS expects all staff and volunteers to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Additional specific responsibilities

The Director has responsibility to ensure:

- this policy has been put in place and is appropriate for the organisation and its activities in relation to children and vulnerable adults.

- there are sufficient resources allocated to enable the policy to be effectively implemented.
- this policy is accessible to all staff, freelancers and volunteers and anyone working with TCS
- this policy is reviewed annually by The Designated Safeguarding Lead and the Board
- this policy is implemented at all times
- the welfare of children and vulnerable adults is promoted across the organisation
- staff, freelancers and volunteers have access to appropriate training and resources to support the implementation of this policy
- staff, freelancers and volunteers concerns are responded to quickly and appropriately
- DBS checks are carried out and up to date for all staff, freelancers and volunteers
- Effective links are made and developed with relevant agencies

The Designated Safeguarding Lead.

At TCS Debra Alexander is the Designated Safeguarding Lead. As Designated Lead for TCS, it is their responsibility to:

- Promote a culture and awareness of safeguarding across the organisation and ensure all relevant staff, freelancers and volunteers are aware of their specific responsibilities as well as their collective responsibility
- Know which outside child or adult safeguarding agency to contact in the event of a child or adult safeguarding concern coming to the notice of TCS and ensure there is a clear pathway for staff, freelancers and volunteers to follow if they have any concerns about a child / vulnerable adult or a member of staff, freelancers and volunteers.
- Ensure all staff are aware of who the designated safeguarding leads are within TCS.
- Provide information and advice on child and adult safeguarding within TCS and ensure that safeguarding is covered in the staff handbook and as part of the induction process for all staff and volunteers.
- Create a safe environment for staff to approach you with questions about safeguarding.
- Ensure appropriate information is available when making a child or vulnerable adult safeguarding referral and that the referral is made within one working day and confirmed in writing within two working days.
- Liaise with local children's and adults social care services and other agencies, as appropriate.
- Keep relevant people within TCS informed about any action taken and any further action required; for example, disciplinary action against a member of the workforce.
- Ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence.
- Advise the organisation of safeguarding training needs and any updates or changes in policy to the safeguarding recommendations and ensure these changes are disseminated to all staff, freelancers and volunteers and adhered to.
- Review annually the operation of the Safeguarding Policy, Procedures and Code of Practice to ensure the procedures are working and that they comply with current best practice.
- Report to the Director as appropriate about safeguarding activity and requirements.

Disclosure Checks

TCS recognises ensuring the well-being and safety of children and vulnerable adults is vital and therefore it undertakes to DBS check all staff, freelancers and volunteers. Only use Disclosure information in the context of the recruitment of ex-offenders. In this way TCS aims to protect applicants from unfair discrimination on the basis of non-relevant past convictions.

Code of Conduct

This code of conduct describes the behaviours and professional boundaries that create safe environments at The Comedy School activities.

Professional boundaries are what define the limits of a relationship between a staff member, freelancers and volunteers and a service user. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

TCS expects staff, freelancers and volunteers to protect the professional integrity of themselves and the organisation at all times by adhering to the following professional boundaries.

Communication:

- Inappropriate comments about a child or vulnerable adult's appearance, including excessive flattering comments.
- Inappropriate conversation or enquiries of a sexual nature (e.g. questions about a child or vulnerable adult's sexuality or his/her sexual relationship with others)
- Disrespectful or discriminatory treatment of, or manner towards, children or vulnerable adults based on their perceived or actual sexual orientation
- Use of inappropriate pet names
- Vilification or humiliation
- Obscene gestures and language
- Facilitating/permitting access to pornographic material
- Facilitating/permitting access to sexually explicit material that is not part of endorsed curriculum
- Failing to intervene in sexual harassment of children and vulnerable adults
- Correspondence of a personal nature via any medium (e.g. phone, text message, letters, email, internet postings) that is unrelated to the staff member's, freelancers and volunteers role.

Personal Disclosure:

- Discussing personal lifestyle details of self, other staff, freelancers and volunteers or children and vulnerable adults unless directly relevant to the learning topic and with the individual's consent.

Physical Contact:

- Unwarranted or unwanted touching of a child or vulnerable adult personally or with objects (e.g. pencil or ruler).
- Corporal punishment (physical discipline, smacking etc.)

- Initiating, permitting or requesting inappropriate or unnecessary physical contact with a child or vulnerable adult (e.g. massage, kisses, tickling games) or facilitating situations which unnecessarily result in close physical contact with a child or vulnerable adult.
- Inappropriate use of physical restraint

Place/Location:

- Inviting/allowing/encouraging children or vulnerable adults to attend the staff member's, freelancers and volunteers home.
- Allowing children and vulnerable adults access to a staff member's, freelancers and volunteers personal internet locations (e.g. social networking sites.)
- *Being alone with a child or vulnerable adult outside of a staff member's, freelancers and volunteers responsibilities.
- *Transporting a child or vulnerable adult unaccompanied
- Undressing using facilities set aside for children or vulnerable adults, or in their presence

*Unless agreed by Director

Targeting Individuals:

- Giving personal gifts or special favours.
- Singling the same children or vulnerable adult out for special duties or responsibilities.

Role:

Adopting an ongoing welfare role that is beyond the scope of their position or that is the responsibility of another staff member, freelancers and volunteers (e.g. a counsellor) or an external professional, and that occurs without the permission of senior staff.

Photographing, audio recording or filming children or vulnerable adults via any medium when not authorised by the TCS to do so and without required parental consent.

Using personal rather than school equipment for approved activities, unless authorised by the TCS to do so.

In addition to the prohibited actions above. All TCS staff, freelancers and volunteers must also agree to the following restrictions:

- Use of abusive language is prohibited at all times when working with students/service users.
- Use of punishment or chastisement outside of TCS's disciplinary policy is prohibited.
- Passing on student or staff, freelancers and volunteers personal contact details is prohibited.
- Under no circumstances should a member of staff, freelancers and volunteers take a student/service user to their family home.
- No staff member, freelancers and volunteers should buy or sell any items to or from a student/service user

- Accepting responsibility for any valuables on behalf of a student/service user is prohibited as TCS cannot take any responsibility for personal belongings during the program
- Accepting money as a gift/ borrowing money from or lending money to students/service users is prohibited.

Professional boundaries when working alone with a child or vulnerable adult:

Make it public

- The more visible, public and busy the location the better
- Use the TCS authorised IT systems
- Do not use personal email or websites to communicate with students/service users

Make it authorised

- Parents should be informed/ give consent
- Activity must be authorised by Director

Professional boundaries for appropriate physical contact:

At times, staff, freelancers and volunteers will be required to give practical assistance to a child or vulnerable adult who is hurt or needs particular assistance or encouragement. Examples of appropriate physical contact are:

- Administration of first aid.
- Supporting children and vulnerable adults who have hurt themselves.
- Non-intrusive gestures to comfort a child or vulnerable adult who is experiencing grief and loss or distress, such as a hand on the upper arm or upper back.
- Non-intrusive touch (e.g. congratulating a child or vulnerable adult by shaking hands or a pat on the upper arm or back). Staff, freelancers and volunteers should remember the importance of accompanying such touch with positive and encouraging words.
- Seek children and vulnerable adult's permission to touch (keeping in mind that a highly distressed child or vulnerable adult may be incapable of expressing their wishes).
- Avoid being with a child or vulnerable adult in a one-to-one, out of sight situation, and never touch a child or vulnerable adult in such a situation.
- Do not presume that physical contact is acceptable to a particular child or vulnerable adult. Even non-intrusive touch may be inappropriate if a child or vulnerable adult indicates he/she does not wish to be touched.
- Respect and respond to signs that a child or vulnerable adult is uncomfortable with touch.
- Use verbal directions rather than touch (e.g. ask a child or vulnerable adult to move in a particular way, rather than physically place the child or vulnerable adult in the required position).
- Use the above approach for demonstrations in dance, sport, music and drama. Where touch is essential for safety reasons (e.g. with swimming or gymnastic instruction), always tell the child or

vulnerable adult that you need to hold him/her in a particular way and seek his/her permission to do so.

- In some circumstances, staff, freelancers and volunteers may need to discourage children from inappropriate expectations of hugs or cuddles. This should be done gently and without embarrassment or offence to the child.

The following policies also contain guidance on staff, freelancers and volunteers conduct: Staff, freelancer and volunteer handbook

If the professional boundaries and/or policies are breached this will result in disciplinary action.

Reporting Procedure

The process outlined below details the stages involved in raising and reporting safeguarding concerns at TCS.

There are 4 key steps to remember:

Recognise abuse or neglect

Respond to concerns (and record any information disclosed to you or observed by you)

Refer concerns on (to Designated Safeguarding Lead who will determine if a referral is necessary)

Record any actions taken and the outcomes

You must refer concerns as soon as possible to Designated Safeguarding Lead for TCS. In the absence of the Designated Safeguarding Lead, the matter should be brought to the attention of the Director or Board member who will take appropriate action.

All referrals of allegations or suspicions of neglect or abuse to the statutory authorities must be made within 24 hours of disclosure. If the Designated Safeguarding Lead is unsure of whether something should be reported, they will contact the local Safeguarding Adults Board, Safeguarding Children Partnership. Suspicions should not be discussed with anyone, other than those named above but a record of the concern must be kept using TCS's Record of Concern Form (See Appendix B).

If you are concerned about someone, it is important that you let them know what will happen next. If you are concerned about a child it is also best practice to inform the parent/carers that a safeguarding referral is being made providing it does not put the child at any increased risk of harm.

Under no circumstances should a staff member, freelancer, or volunteer, including the Designated Safeguarding Lead, investigate allegations of abuse. The role of the Designated Safeguarding Lead is to collect the exact details of the allegations or suspicions and to provide this information to the local Safeguarding Adults Board, Safeguarding Children Partnership and/or Children or Adult Social Services who will investigate the matter.

In emergency situations might be necessary to take immediate action to contact Children's or Adult Social Care and/or the police to discuss putting into effect safety measures.

Self-determination

A key distinction between safeguarding procedures for adults and children is that adults have the right to self-determination where they may choose not to have safeguarding intervention. It is only in extreme circumstances where this would be overridden and the law required to intervene.

Additional reporting routes:

If you have followed the Comedy School's safeguarding policy, but still have concerns, you can contact the following agencies for advice:

Identifying and reporting child abuse:

- If the risk is not immediate, report child abuse to your local council. You can put your postcode into GOV.UK service finder to find out who to call in your area. You can also report via the NSPCC helpline
- If you are unsure how severe your concern is and want to talk it through, you can also call the NSPCC helpline for advice; 0808 800 5000
- If you're a child or young person and need someone to talk to contact Childline online or call: 0800 1111

*Advice and agency contact details taken from NCVO's website: <https://www.ncvo.org.uk/help-and-guidance/safeguarding/getting-started-with-safeguarding/immediate-concerns/>

Identifying and reporting abuse of an adult:

Who you report abuse to depends on where the adult lives and who looks after them

- To report concerns of abuse about an adult in an NHS hospital or clinic contact its manager
- To report concerns about any other adults, including adults who live in care homes or have home carers, report abuse to your local council. If you don't know which council, use the postcode finder

If you're unsure how severe your concern is and want to talk it through, call a helpline for advice:

- For concerns about an elderly person, call Hourglass (formerly Action on Elder Abuse) on: 0808 80808141 (Available 09.00 to 17.00 Monday to Friday)
- The 24hr National Domestic Abuse Helpline can give advice on supporting someone experiencing domestic violence. Call them on 0808 2000 247
- If you need someone to talk to, contact Samaritans online or call 116 123

Working in partnership with other organisations

The Comedy School frequently works in partnership with other organisations. In all partnerships, The Comedy School will verify that the partner's safeguarding policy and procedures are to standard of The Comedy School's. Any concerns about a partner's policy or procedures will be raised with their Designated Safeguarding Lead.

Safeguarding is everyone's responsibility, regardless of whether they are the Lead Partner or not in a collaboration. The Designated Safeguarding Leads in both organisations will inform each other of the event of a referral being made.

Safeguarding online

This safeguarding policy applies to in-person and online activities. For online programmes, virtual rooms are password protected and require a 'host' to let them in. This is to ensure that only those who are expected to take part in a session are present.

Monitoring and Management of the Safeguarding Practices

TCS will monitor the following Safeguarding aspects:

- Enhanced DBS checks undertaken
- References applied for new staff, freelancers and volunteers.

- Training – register/ record of staff, freelancers and volunteers training on child/ vulnerable adult protection
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant - annually
- Reviewing the current reporting procedure in place - annually

Managing Confidential Information:

Information will be gathered, recorded and stored in accordance with the following policies: Data Protection Policy, Confidentiality Policy and Equality Policy.

The principles of the GDPR and Data Protection Act 2018 must be adhered to when handling personal information, that is:

- Personal information is obtained and processed fairly and lawfully
- Only disclose in appropriate circumstances
- Accurate, relevant and not held longer than necessary
- Kept securely

The Act allows for the disclosure of personal information without consent of the subject in certain conditions, including the purposes of the prevention and detection of a crime, for example where there is concern about a child or vulnerable adult's welfare and protection. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children, young people and adults safe.

All staff, freelancers and volunteers must be aware that they have a professional duty to share information with other agencies in order to safeguard children. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding Lead or Director.

All staff, freelancers and volunteers must be aware that they cannot promise children or their families/ carers that they will keep secrets.

Ensure any information shared is necessary, proportionate, relevant, accurate, timely and secure.

In all cases where information is shared the following should be recorded:

- Date and time
- Summary of information shared
- Who the information was shared with
- Whether the information is being shared with or without consent
- If sharing without consent, whether or not the child and/or family have been informed
- How the information was shared and any receipt of the other parties receiving the information

Written reports about safeguarding concerns or allegations must be stored in a locked drawer or cabinet (with restricted access) or held securely electronically. They will be retained as long as necessary to a maximum of seven years.

Appendices

Appendix A – TCS Safeguarding – Supporting Information

Potential Indicators of abuse or neglect

The following signs may be indicators or signs that abuse has taken place although some of these indicators can also be caused by other factors, e.g. a bereavement, family breakdown or illness. It is not the role of TCS's staff, freelancers and volunteers to decide if abuse or neglect has taken place, this is a complex task undertaken by skilled professionals working together across agencies. However, if any of these signs are present then these concerns should be shared as outlined in the procedure. In deciding if something may be a concern it is always helpful to think about the child's age, abilities and stage of development too. It is important to keep in mind that abuse may be committed against children by members of the child's family or party; by other children; or by members of the internal staff, freelancers and volunteers.

Physical Abuse

Physical signs of abuse:

- Injuries which occur to the body in places which are not normally exposed to falls or games
- Most children will collect cuts and bruises in their daily life, particularly on bony parts of their body like elbows, knees and shins. You should be more concerned by bruising which can almost only have been caused non accidentally, is unexplained, or the explanation does not fit the injury, or where treatment isn't being sought. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may be needed. Patterns of bruising that are suggestive of physical child abuse include:
 - bruising children or vulnerable adults who are not independently mobile
 - bruises that are seen away from bony prominences
 - bruises to the face, back, stomach, arms, buttocks, ears and hands
 - multiple bruises in clusters or of uniform shape, or carrying the imprint of an implement used, hand marks or fingertips
 - Unexplained bruising, marks or injuries on any part of the body
 - Cigarette burns, bite marks, broken bones, scalds
 - Injuries which have not received medical attention
 - Repeated urinary infections or unexplained stomach pains
 - Changes in behaviour which may 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
 - Withdrawn behaviour
 - Running away from home

Emotional Abuse

The physical signs of emotional abuse may include:

- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour that may indicate emotional abuse include:

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

Sexual Abuse

The physical signs of sexual abuse may include:

- Sexually transmitted disease
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour that may indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond his/her age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Having unexplained sources of money

- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults

Neglect

The physical signs of neglect may include:

- Constant hunger, or stealing food from other children
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions
- Under nourishment, failure to grow, inadequate care

Changes in behaviour that can also indicate neglect include:

- Complaining of being tired all the time
- Untreated illnesses, not requesting medical assistance and/or failing to attend medical appointments
- Having few friends
- Being left alone, being unsupervised or being supervised by an unsuitable adult or young person

Bullying (in some circumstances bullying can be considered as emotional, physical or sexual abuse)

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by bullying (including bullying via the internet) can frequently be underestimated. It can cause considerable distress to children, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).

Appendix B - TCS Safeguarding Concern Report Form

Date and time of report of
concern:

Name of the Child / Vulnerable Adult:	Age of the Child/Vulnerable Adult and Date of Birth:
Parent/Carer's Name and Home Address:	Contact details: T: E:
Staff Member's Name:	Staff Member's Position in the Company:

I am reporting my own concerns or passing on someone else's concerns
(Delete as applicable)

Please provide clear factual details of the concern:

Please describe briefly what has prompted these concerns (including dates, times etc. of any specific incidents)

Are there any physical or behavioural signs? Please provide clear and accurate details:

Have you spoken with the child/Vulnerable Adult? Please record below the conversation as accurately and in as much details as possible:

Have you spoken to the parent/carer of the child/Vulnerable Adult? Please record below the conversation as accurately and in as much details as possible:

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Has anyone been alleged to have caused this concern or possible abuse? Please provide details:

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Have you spoken to anyone else about these concerns? Please provide details:

report:	
Signature:	
Job Title:	
Date report was received:	

Appendix C The Comedy School Safeguarding – Useful Contacts

<u>Name</u>	<u>Email</u>	<u>Number</u>
Debra Alexander Project Co-ordinator Designated Safeguarding Lead	projects@thecomedyschool.com	Tel: 020 7486 1844
Keith Palmer Director of The Comedy School	keithpalmer@thecomedyschool.com	Tel :07779100520
Camden Adult Safeguarding	adultsocialcare@camden.gov.uk	Tel: 0207 9744000
Camden Police Station		Tel: 020 8284 5100
Lambeth		Tel: 020 792605555 (9am - 5pm Mon-Fri) Out of hours Tel: 020 79265555
Southwark	MHContact@southwark.gov.uk	Tel: 020 7525 0088
Lewisham		Tel: 020 831407777