

# The Comedy School Safeguarding Young People and Vulnerable Adult Protection Policy

Date of review: January 2022

## Policy Statement on Safeguarding

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

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 or 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, have a responsibility to safeguard and promote the welfare of children and vulnerable adults.

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 employees and this document outlines policy and how we implement it.

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 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.

"Protecting children from maltreatment, preventing impairment of children's health or development, ensuring children are growing up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best chances." (Working Together to Safeguard Children 2015)

*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 his/herself or protect his/herself from harm or from being exploited. This may include a person who:

- Is elderly and frail
- Has a mental illness, including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

**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, volunteers and anyone working with TCS
- this policy is reviewed annually
- this policy is implemented at all times
- the welfare of children and vulnerable adults is promoted across the organisation
- staff have access to appropriate training and resources to support the implementation of this policy

- staff concerns are responded to quickly and appropriately
- DBS checks are carried out and up to date for all staff and volunteers
- Effective links are made and developed with relevant agencies

*The Designated Safeguarding Lead.*

At TCS Debra Alexander is the designated safeguarding 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 and volunteers are aware of their specific responsibilities as well as their collective responsibility
- Know which outside child protection agency to contact in the event of a child protection concern coming to the notice of TCS and ensure there is a clear pathway for staff to follow if they have any concerns about a child or a member of staff.
- Ensure all staff are aware of who the designated safeguarding leads are within TCS.
- Provide information and advice on child protection 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 protection referral and that the referral is made within one working day and confirmed in writing within two working days.
- Liaise with local children's 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 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 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.

**Professional Boundaries**

Professional boundaries are what define the limits of a relationship between a staff member 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 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 role.

*Personal Disclosure:*

- Discussing personal lifestyle details of self, other staff 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 home.
- Allowing children and vulnerable adults access to a staff member's personal internet locations (e.g. social networking sites.)
- \*Being alone with a child or vulnerable adult outside of a staff member's 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 (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 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's personal contact details is prohibited.
- Under no circumstances should a member of staff take a student/service user to their family home.
- No staff member 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 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 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 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 and volunteers conduct: Staff 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 or other agency)

Record any actions taken and the outcomes

You must refer concerns as soon as possible to designated safeguarding officer for TCS. In the absence of the designated persons, 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. 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 a child, it is important that you let the child know what will happen next. 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.

*In the event of allegations of sexual abuse, the Designated Safeguarding Lead will:*

Contact the Children's Social Care or Police Child Protection Team directly. Under no circumstances should the Designated Safeguarding Lead, or any other member of the organisation, attempt to carry out any investigation into the allegations or suspicions of sexual 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 child protection agencies that will investigate the matter under the Children Act 1989.

*If a child brings an allegation of abuse to you directly:*

Stay calm and listen carefully to what is said.

Remember to let the child or young person talk and not to interrupt them.

Find an appropriate time early in your chat to explain that it is likely you will need to share the information with others but reassure them it will be only to those who need to know. Do not promise to keep secrets.

Limit questions by avoiding leading questions. However, it may be appropriate to ask further questions in order to clarify details rather than jumping to conclusions.

Good questions to focus on are:

- What happened?
- When did it happen?
- Who did it?
- Where were you?
- Also remember to use phrasing such as 'Tell me', 'Explain to me' and 'Describe to me'

Reassure the child that they have done the right thing in telling you and explain what will happen next and who you will share the information with.

Make a note immediately of what the child has said, writing down exactly what the child has said, write down what you said in reply, and what was happening immediately beforehand. Record dates and times of the events and when the record was made. These should be factual and not opinion driven.

Ensure the Designated Safeguarding Lead keeps all notes secure and in a locked office drawer in the TCS office.

Report your discussion as soon as possible to the Designated Safeguarding Lead.

Once a child has talked about abuse the Designated Safeguarding Lead must consider if it is safe for a child to remain on the program. On a rare occasion it might be necessary to take immediate action to contact Children's Social Care and/or the police to discuss putting into effect safety measures for the child to ensure they are able to stay in a safe environment while arrangements for their return home can be arranged.

### **Monitoring and Management of the Safeguarding Practices**

TCS will monitor the following Safeguarding aspects:

- Enhanced DBS checks undertaken
- References applied for new staff
- Training – register/ record of staff 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

### **Confidentiality and Information Sharing:**

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 Data Protection Act 1998 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. REMEMBER that the Data Protection Act 1998 is not a barrier to sharing information but provides a framework to ensure information is shared appropriately.

All staff 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 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. Retention timelines for these records are as follows:

Concerns about a child – Records should be kept for 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 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.

## **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

( For a stand alone printable version of this Report Form click here:

<https://thecomedyschool.com/safeguarding-policy.html> )

**Date and time of report of concern:**

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

**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:**

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

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

<b>Name of DSL handling this report:</b>	
<b>Signature:</b>	
<b>Job Title:</b>	
<b>Date report was received:</b>	