

ROYAL
ACADEMY
OF
DANCE

Safeguarding Policy
and Procedures

Policy and procedures on safeguarding children and adults at risk

Contents

Section	Page
1 Introduction and policy statement	3
Purpose of the Policy	
Statutory and legislative frameworks	
Scope of the Policy	
Responsibilities	
Policy Statement	
Embedding safeguarding at the RAD	
Terminology and definitions	
2 Responding to incidents, suspicions and allegations of abuse	13
Overview and responsibilities	
Responding to a safeguarding incident or concern involving a child or adult at risk	
Responding to a safeguarding incident or concern involving a member of RAD staff, student, member, volunteer or visitor	
Reporting a safeguarding incident or concern	
Early intervention and help	
After a safeguarding incident or concern has been reported	
Further advice and guidance	
3 RAD Code of Behaviour and Good Practice	21
4 Senior Safeguarding Officers, Designated Safeguarding Officers, the Safeguarding Committee and Prevent Lead and Key Individuals	24
5 Recruitment, selection and vetting	25
6 Training and support	26
7 Photography and filming of children and adults at risk	26
8 Project Tearose	27
9 Research	27
10 Data handling, monitoring and evaluation	27
11 Review of policy and procedures	28
12 Signature	28

Appendices

Appendix 1	Types and definitions of abuse: child protection and adults at risk	29
Appendix 2	Guidance on recognising signs of abuse	39
Appendix 3	Procedure for dealing with abuse between children / adults at risk	44
Appendix 4	Safeguarding Incident Report Form	46
Appendix 5	A quick guide to reporting procedures	51
Appendix 6	Senior Safeguarding Officers and Designated Safeguarding Officers, Safeguarding Committee Structure, Prevent Lead and Key Individuals, including contact details	52
Appendix 7	Safeguarding and Prevent Training Policy	56
Appendix 8	Principles of information sharing	61
Appendix 9	Virtual Safeguarding Policy (<i>to be published</i>)	62
Appendix 10	Additional resources	63

I. Introduction and policy statement

Purpose of the Policy

- I.1 The Royal Academy of Dance (RAD) has a 'duty of care' to provide a safe environment for and to promote the health and well-being of children under the age of 18 years and adults at risk. The RAD takes all reasonable steps to ensure that safeguarding and promoting the welfare of children and adults at risk is embedded in our contact with them through the training and activities we provide.
- I.2 The protection of children and adults at risk is important to the RAD. The aim of the RAD's Policy and Procedures on Safeguarding Children and Adults at Risk (the "Policy") is to ensure that children and adults at risk with whom RAD comes into contact are well protected and that there is a system in place to protect their welfare.
- I.3 The RAD believes that the welfare of the child is paramount, and that all children and adults at risk regardless of age, disability, gender, race, sexual orientation or identity, or religious belief have the right to equal protection from all types of harm or abuse.
- I.4 The purpose of this policy and associated procedures is:
 - to facilitate protection for children under the age of 18 years and adults at risk during any activity provided by the RAD;
 - to provide staff with procedures to follow in the event that they suspect a child or adult at risk may be experiencing abuse or be at risk of abuse or harm;
 - to protect children and adults at risk where there is a concern about the behaviour of an adult, including a member of RAD staff;
 - to assist all individuals at the RAD to meet their duty of care to safeguard all children and adults at risk who take part in RAD activities;
 - to uphold our duty to have due regard to the need to prevent people (children, adults at risk and students) from being drawn into terrorism, known as the Prevent Duty; and
 - to ensure that where RAD staff, students, Faculty of Education students or visitors have concerns about the welfare of children or adults at risk, they are in a position to take appropriate steps to address them.

Statutory and legislative frameworks

- I.5 This policy has been drawn up on the basis of UK law and guidance, but due to the nature of the RAD's work globally it also embraces all the principles contained in the United Nations Convention on the Rights of the Child 1991 (UNCRC). This is the only international human rights treaty to include civil, political, economic, social, and cultural rights. It sets out in detail what every child needs to have a safe, happy and fulfilled childhood regardless of their sex, religion, social origin and where and to whom they were born.

- 1.6 The RAD embraces the statutory guidance contained in *Working Together to Safeguard Children* (2018). This covers the legal requirements of and expectations on individual services to safeguard and promote the welfare of children and to provide a clear framework for Local Safeguarding Partnerships to monitor the effectiveness of local services. It also specifies that voluntary organisations should have policies in place to safeguard and protect children from harm and systems to ensure compliance, and that individuals working for such organisations (whether paid or volunteer) should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns, and how to make a referral.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

- 1.7 The RAD follows *Keeping children safe in education: Statutory Guidance and Information for all school and college staff* (September 2020) which is a document outlining the duty to safeguard and promote the welfare of children.

- 1.8 As a charity registered in England and Wales, the RAD is bound by the requirements of Charity Commission guidance on safeguarding (*Safeguarding and protecting people for charities and trustees*, updated October 2019), issued in the context of the Charities Act (2011) and the Charities (Protection and Social Investment) Act 2016. This places specific responsibilities on charity trustees (see 1.12 below), and includes requirements to protect all people who come into contact with a charity from harm, including paid staff, volunteers, beneficiaries, customers, those involved in charitable activities, and donors.

The Fundraising Code of Practice (2019) includes minimum expectations on keeping children and adults at risk safe. Fundraisers must take into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.

- 1.9 Under the Children Act 1989, which applies to England and Wales, a child is a person up to the age of 18 years. For child protection purposes, all four nations in the UK use an age band up to 18 years old. This can also be up to the age of 25 years in the case of someone who is receiving help from Social Services or Education. Other relevant legislation includes the Children Act 2004 and the Children, Schools and Families Act 2010.

Similar arrangements exist in Scotland under the Children (Scotland) Act 1995; Protection of Children (Scotland) Act 2003; Protection of Vulnerable Groups (Scotland) Act 2007; and the Protection of Vulnerable Groups (Scotland) Act 2007 (Removal of Barred Individuals from Regulated Work) Regulations 2010, and, in Northern Ireland, the Children (Northern Ireland) Order 1995 and Safeguarding Vulnerable Groups (NI) Order 2007.

Additionally, under Section 3 of the Children Act, an individual without parental responsibility who is caring for a child 'may do what is reasonable for the purposes of safeguarding or promoting a child's welfare while the child is in his or her care'. This creates a liability on the part of all persons or organisations acting *in loco parentis* for any failure to meet any part of their responsibility for a child.

- I.10 The definitions of abuse relating to adults at risk (formerly vulnerable adults) are taken from *No Secrets* (Department of Health, 2000) and from the 1997 Consultation *Who Decides?* issued by the Lord Chancellor's Department. The types of abuse relating to adults at risk can be found in Appendix I. Under the Care Act 2014, local authorities and relevant partners must co-operate with each other in the exercise of care for adults with support needs, and their carers.
- I.11 Additional guidance or legislation relevant to these safeguarding procedures includes the Data Protection Act 2018, Children and Adoption Act 2006, Sexual Offences Act 2003 (Remedial Order) 2012, Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012, Female Genital Mutilation Act 2003 (as inserted in the Serious Crime Act 2015), Counter-Terrorism and Security Act 2015, and Care and Support Statutory Guidance (2020) and the Voyeurism Act 2019. There is also a common law duty of care applicable to organisations not to be negligent and to avoid causing harm or injury.

Scope of the Policy

- I.12 The Scope of the Policy sets out who must follow the Policy in all locations worldwide where RAD activities are delivered. It also sets out where it does and does not apply to RAD members.
- I.13 The Policy applies to all persons working on a paid or unpaid basis on behalf of the RAD. This includes, but is not limited to, Trustees, Sub-Committee members, all other persons who fulfil a responsibility or role in a voluntary (unpaid) capacity, permanent, fixed term and temporary employees, casual workers (including pianists and assistants), freelance staff, including examiners, tutors, teachers, mentors, practical teaching supervisors, chaperones, examination attendants and course attendants (doorkeepers). This includes all persons working on a paid or unpaid basis on behalf of the RAD worldwide, including the paid or unpaid staff or representatives in National Offices RAD and any persons working on behalf of the RAD in any country in which the RAD delivers activities, including freelance staff. In this policy all these persons are described as 'RAD staff'.
- I.14 This Policy applies to Students registered on a Faculty of Education programme of study (university or RAD validated), and students on any other course or activity run by the RAD, worldwide.
- I.15 This Policy applies to contractors, external hirers and visitors defined as delivery persons, general visitors, parents/guardians attending an RAD activity on or off RAD premises, worldwide.
- I.16 This Policy is conceived and presented from a UK perspective. However, the RAD is a global organisation and the standards and principles of this Policy apply to all RAD staff, students, volunteers and visitors worldwide. We recognise that there may be international legal and cultural variants in safeguarding children and adults at risk and where these are significant the relevant RAD National Office will have its own Safeguarding Policy and Procedures based on this Policy, which will adhere to this Policy as a minimum standard,

will follow the principles and procedures laid out in this Policy as closely as possible, and will be available on the relevant RAD national website and / or from the relevant office. Unless superseded by such a local policy, the procedures outlined in this Policy apply globally.

- I.17 RAD activities may be planned and managed from one country and delivered in another, either in person or online. This Policy is adhered to as a minimum wherever the activity is managed or delivered.
- I.18 Where RAD members are running their own dance classes, the RAD expects as good practice that they will have a safeguarding policy in place. This Safeguarding Policy and Procedures can be referred to for best practice and is available on the RAD website. The Code of Conduct for RAD Members is also relevant and available on the RAD website. This Policy does not apply to the safeguarding of students in private dance schools or dance classes operated by RAD Registered Teachers who are responsible for their own safeguarding policy, practice and governance.

Responsibilities

- I.19 Safeguarding and promoting the welfare of children and adults at risk and observing the Prevent duty are everyone's responsibility. Everyone, including those who work for the RAD and particularly those who come into contact with children, adults at risk and families, has a role to play. All professionals should ensure that their approach considers at all times what is in the best interests of the child ('child-centred') or adult at risk. No single professional, including those at the RAD, can have a full picture of a child or adult at risk's needs and circumstances. If children, carers and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- I.20 The RAD Board of Trustees will ensure that they comply with their duties under legislation. They will ensure that the Safeguarding Policy and Procedures and training are effective and comply with the law at all times and take account of statutory guidance. The Board of Trustees will remedy any deficiencies or weaknesses in regard to safeguarding and child protection arrangements that are brought to their attention without delay.
- I.21 Specifically, the Charity Commission sets out that 'Trustees should promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to. It expects Trustees to make sure the RAD:
- has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries;
 - checks that people are suitable to act in their roles;
 - knows how to spot and handle concerns in a full and open manner;
 - has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified;
 - sets out risks and how they will be managed in a risk register which is regularly reviewed

- follows statutory guidance, good practice guidance and legislation relevant to their charity: this guidance links to the main sources of information;
- is quick to respond to concerns and carry out appropriate investigations;
- does not ignore harm or downplay failures;
- has a balanced trustee board and does not let one trustee dominate its work – trustees should work together;
- makes sure protecting people from harm is central to its culture;
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people; and
- conducts periodic reviews of safeguarding policies, procedures and practice.

I.22 The RAD has established a hierarchy of responsibility under the oversight of the Board of Trustees. The Chief Executive Officer and the Executive Board have strategic responsibility for safeguarding and Prevent policy and practice.

I.23 Senior Safeguarding Officers (SSOs) are accountable for RAD safeguarding practice and have overriding responsibility for dealing with all safeguarding incidents in consultation with relevant staff or external agencies. The Duties of the Senior Safeguarding Officers are:

- to be accountable for RAD safeguarding practice;
- to ensure safeguarding is afforded priority at the most senior level within the RAD;
- to ensure that the RAD has a committee structure in place to fulfil its safeguarding responsibilities;
- to ensure funding and resources are available to fulfil safeguarding responsibilities;
- to create a network of Designated Safeguarding Officers (DSOs) in consultation with the Safeguarding Committee;
- to ensure monitoring and review systems are in place to respond to new guidance and legislation and to test existing systems;
- to ensure that the RAD has procedures for dealing with incidents, allegations or suspicions of abuse against RAD staff, students and visitors;
- to ensure all RAD staff are trained appropriately according to their roles;
- to refer incidents, allegations or suspicions of abuse to relevant investigating agencies;
- to keep securely detailed and accurate records of any incidents, allegations or suspicions of abuse;

- to report quarterly any incidents, allegations or suspicions of abuse in an anonymous form to the Safeguarding Committee;
- to report annually any incidents, allegations or suspicions of abuse in an anonymous form to the Board of Trustees;
- to liaise with the DSOs to inform them of any issues and ongoing investigations and be available to support and advise DSOs as needed;
- to organise and chair an annual safeguarding meeting for SSOs and DSOs;
- where appropriate, to inform the Dean of the Faculty of Education, Head of Human Resources or relevant Head of Department about incidents, allegations or suspicions of abuse;
- to report incidents to the Charity Commission (see: <https://www.gov.uk/government/news/alert-on-reporting-serious-incidents-rsi>), Ofsted, Ofqual, Office for Students, and/or other external agencies as appropriate;
- to ensure that any incidents which are felt serious enough to be reported to the Charity Commission are included in the RAD Annual Report;
- to undertake annual training to keep up to date with the most relevant safeguarding procedures for dealing with children and adults at risk; and
- to undertake Prevent Awareness training so as to be able to provide advice and support to others on protecting children, adults at risk and students from the risk of radicalisation.

I.24 Reporting to SSOs are Designated Safeguarding Officers (DSOs) who are RAD employees working in different departments. In most cases, DSOs deal with all safeguarding incidents as the first point of contact. In some cases, incidents may immediately be referred to an SSO. The duties of Designated Safeguarding Officers are:

- to refer allegations or cases of suspected abuse to an SSO;
- to act as a first point of contact and source of support, advice and expertise within the RAD;
- where applicable to act as a “trusted adult” for children participating in RAD activities;
- to ensure that there is always cover for this role;
- to inform an SSO immediately if they feel unable to fulfil their duties within this role at any point;
- to attend the annual safeguarding meeting for SSOs and DSOs;
- to undertake annual child protection, Prevent and Channel Awareness training to keep up to date with safeguarding and prevent legislation and best practice;

- to keep under review any RAD activities which involve children and adults at risk in order to ensure that good safeguarding practice as outlined in this policy is followed; and
- in conjunction with HR and/or the relevant recruiting manager, to ensure that individuals assisting in RAD activities, be they paid staff, students, volunteers or visitors are suitable to work with children or adults at risk and that they have undergone the necessary Vetting and Barring checks, which have been followed up and checked via the Disclosure and Barring Service, and records kept securely in the Human Resources department.

I.25 There is a Safeguarding Committee chaired by a member of the Executive Board that has operational responsibility for safeguarding and Prevent arrangements and policy. The Safeguarding Committee audits this Policy to ensure it is working effectively, that all incidents are recorded, action is taken and best practice is in place, and reports, through the Chair of the Safeguarding Committee to the Executive Board and the Board of Trustees. See more detail in Section 4.

I.26 The RAD has a small number of Licensed Chaperones who are responsible for safeguarding and ensuring the welfare of children taking part in entertainment. They are established under child performance legislation; local authorities issue licences and have the power of enforcement. A Licenced Chaperone is acting *in loco parentis* (in place of the parent) and should 'exercise the care which a good parent might be reasonably expected to give that child'.

I.27 This policy also sets out the specific responsibilities of Heads of Departments, those responsible for external hire contracts, the Head of HR and HR Department, in addition to the responsibilities of all RAD staff, students and member for safeguarding and Prevent.

Policy Statement

I.28 The RAD will safeguard children and adults at risk by:

- valuing, listening to and respecting them;
- adopting child protection procedures;
- sharing information about child protection, Prevent and good practice with children, adults at risk, parents, carers, staff and the companies and organisations with which we work;
- working openly and in partnership with parents, carers and guardians in relation to child protection and safeguarding concerns of children and adults at risk;
- sharing information about concerns with the appropriate agencies;
- implementing, communicating and ensuring staff adhere to the RAD Code of Behaviour and Good Practice;
- providing a 'trusted adult' for children and adults at risk during RAD activities and communicating this to parents/guardians, carers, children and adults at risk by appropriate methods, including a simple poster with the photograph(s) and names of the trusted adult(s);

- providing a specific email address for anyone who is concerned about something or somebody to use, if they prefer to email rather than speak directly to someone. The email address is tellsomebody@rad.org.uk
- ensuring safe recruitment, selection and vetting of staff;
- providing effective management through supervision, appraisal, support, training and development;
- having due regard to the need to prevent people (children, adults at risk and students) from being drawn into terrorism, known as the Prevent Duty;
- ensuring the security of RAD premises where activities involving children and adults at risk take place, including the use of staff and visitor passes as appropriate and other security measures including Emergency Response Plans for events held off-site and full and partial lock downs in the event of an emergency situation;
- providing a Safeguarding Committee with operational responsibility for all safeguarding and Prevent arrangements across the RAD;
- establishing clear guidelines for RAD teaching and activities delivered remotely (online) as set out in the RAD Virtual Safeguarding Policy in Appendix 9;
- ensuring that children are safeguarded from potentially harmful and inappropriate online material by implementing appropriate filters and monitoring systems (see Email and Internet policy available to employees on SelectHR); and
- ensuring that there are appropriate arrangements in place to safeguard the collection of children under 11 years old from the end of RAD activities. These arrangements may include the person collecting the child giving a password before a young student is released and/or the wearing of wristbands issued by the RAD for one-off events.

Embedding safeguarding at the RAD

I.29 This policy works in conjunction with other RAD policies and procedures, in particular:

- Criminal Record Checks and Recruitment of Ex-Offenders Policy
- Recruitment and Selection Policy & Procedures
- Policy on use, storage and dissemination of information revealed in a Disclosure
- Whistleblowing Policy & Procedure
- Social Media and Digital Communications Policy
- Visual Media Policy
- Information Management Policy and Procedures

- Equality, Diversity and Inclusion Policy
- Faculty of Education Prevent Policy
- Emergency Response Policy and Procedures (*to be published*)

all of which are available on the RAD website.

The HR Department and Faculty of Education provide applicants with written instructions and advice related to making an application for criminal record checks.

- I.30 This Safeguarding Policy is available on the RAD website and all RAD employees are made aware of it through the Employee Handbook, Terms and Conditions of Engagement, induction programmes, training and/or personal development programmes and have access to it through SelectHR. It will also be referred to in relevant correspondence, briefings and presentations, and for site visits. The Policy is reviewed annually and associated policies are reviewed biennially or sooner if there are changes in legislation, guidance or in the event of an incident. All staff are notified of any changes to the Policy.
- I.31 All RAD staff undergo safeguarding training in accordance with best practice and as described in the Safeguarding and Prevent Training Policy in Appendix 7, to support understanding and implementation of the Policy. All other parties that have contact with the RAD, including visitors, contractors and external hirers will be made aware of the Policy via signing in/out sheets, terms and conditions, contracts, notices and the RAD website and will be expected to adhere to it.
- I.32 This is an RAD corporate policy with which all staff worldwide are expected to abide. It is a condition of employment or engagement that staff abide by the rules, regulations and policies made by the RAD and which are referred to in the Employee Handbook (employees) or Terms and Conditions (freelance and casual workers). Acceptance of employment or engagement signifies an agreement to abide by this Policy. Any failure to comply with the Policy may be considered a disciplinary matter and will be dealt with in accordance with the appropriate disciplinary procedure, which may lead to dismissal.

Terminology and definitions

- I.33 There are four main recognised categories of child abuse: physical abuse, sexual abuse, neglect, and emotional abuse; in addition, the RAD is aware of other considerations and practices that affect children and young people such as self-harm, eating disorders, bullying (including cyber-bullying), peer-on-peer abuse, serious youth violence (including knife/gun crime and county lines), female genital mutilation (FGM), violence in the name of honour, radicalisation, child sexual exploitation, sexual violence and sexual harassment (including upskirting). A child/children is defined as persons under the age of 18 years. See Appendix I for more detail and definitions of types of abuse.
- I.34 The RAD also works with adults at risk who are protected by different legislation. The main forms of abuse in relation to an adult at risk include: physical abuse, sexual abuse, psychological abuse, financial or material abuse, neglect, acts of omission, and discriminatory abuse. An adult at risk is defined as persons aged 18 or over whose physical or mental impairment or condition places them at risk of harm, exploitation or abuse.

I.35 The full definitions relating to child abuse and adults at risk (and additional information about bullying, self-harm, eating disorders, FGM, serious youth violence, violence in the name of honour, radicalisation, sexual violence, sexual harassment and child sexual exploitation), can be found in Appendix I.

I.36 Other definitions not provided elsewhere:

Appropriate authority	This is the correct authority to which to refer an incident, allegation or suspicion. It might be the police, IPOC, social services (children's social care or adult social care), the local safeguarding children's board or statutory committee.
Channel	A programme linked with Prevent which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people identifying individuals at risk; assessing the nature and extent of that risk; and developing the most appropriate support for the individual.
IPOC	'Initial Point of Contact' for a team of individuals under the remit of a local authority / council who come from different organisations. for example, the council, the health service and the police working together to protect children and young people from harm.
LADO	<p>'Local Authority Designated Officer'. The role of the LADO is set out in the HM Government guidance 'Working Together to Safeguard Children (2018)'. The LADO works within Children's Services (alongside the IPOC) and should be alerted to all cases in which it is alleged that a person who works with children has:</p> <ul style="list-style-type: none">• behaved in a way that has harmed, or may have harmed, a child• possibly committed a criminal offence against children, or related to a child; or• behaved towards a child or children in a way that indicates they are unsuitable to work with children. <p>The LADO helps co-ordinate information sharing with the right people and will also monitor and track any investigation, with the aim to resolve it as quickly as possible. You can find the LADO via the local authority in the area where the child/young person resides.</p>
Prevent Duty	The duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

Students	Faculty of Education students, Step into Dance students, students enrolled on GCSE and A Level Dance courses, RAD Dance School students, students attending Training Department activities and events, students attending regional events, examination candidates and any other person participating in an activity organised by the RAD.
Trusted adult	Someone (who might be a DSO) who children and adults at risk know that they can approach if they are concerned or worried about something that has happened to them whilst they have been at an RAD activity or elsewhere.
'Upskirting'	The practice of surreptitiously photographing or filming underneath a person's dress or skirt without their consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. This has been a criminal offence in the UK since February 2019.

2. Responding to incidents, suspicions and allegations of abuse

Safeguarding issues rarely follow a consistent pattern or can be covered by one definition or label. In most cases, multiple issues will overlap with one another and decisions about responses will be nuanced and complex.

Overview and responsibilities

- 2.1 These procedures aim to strike a balance between the need to protect children and adults at risk from abuse and the need to protect RAD staff, students, members, volunteers and visitors from false allegations.
- 2.2 It is not the responsibility of anyone working at RAD in a paid or voluntary capacity to decide whether a child or adult at risk has been abused in the past, is being abused or might be abused. However, there is a responsibility to act on concerns in order that children and adults at risk can be supported and protected in the short term, and that appropriate agencies can make enquiries and take any necessary action to protect them (see also the RAD Whistleblowing Policy).
- 2.3 It is the remit of the appropriate authority and not anyone connected with the RAD to investigate incidents that require referral.
- 2.4 Abuse of children and adults at risk can and does take place outside the family setting, including within organisations, potentially by anyone involved in working with children or adults at risk in a paid or voluntary capacity. Evidence indicates that abuse which takes place in an organisation is rarely a one-off event, so it is important that all staff within the RAD are aware of this and take the appropriate action to respond to an allegation or suspicion.
- 2.5 Abuse of children and adults at risk can be perpetrated by another child or adult at risk and where this occurs the age and understanding of the alleged perpetrator must be taken into consideration. The circumstances of the alleged abuser must be assessed separately

from those of the alleged victim and must include exploration of why the behaviour has occurred.

- 2.6 Where the RAD receives reports of concerns about the way that an RAD teacher is working with children and young people that raises questions about safe dance practice (particularly with respect to the possibility of physical injury or impairment being caused to students), the RAD will carry out all possible and appropriate investigations as the expert in the dance education field. In the event of the investigation substantiating such concerns, a safeguarding referral may then be made to the appropriate authority. In this context it should be noted that complaints against members cannot be assumed to be substantiated until appropriate processes have been completed, and in some circumstances may be rejected or may not be able to be investigated (e.g. in the case of anonymous complaints).

Responding to a safeguarding incident or concern involving a child or adult at risk

- 2.7 If an incident, allegation or suspicion of abuse or any other matter which calls the wellbeing of a child or adult at risk into question (hereinafter referred to as 'incident') is disclosed, seen, heard or suspected, the person receiving the information, whether a member of RAD staff, SSO, DSO, Faculty of Education student, student, member of another organisation with which the RAD is working, or a visitor to the RAD, should follow the procedure below:

- stop other activity and focus on what you are being told or seeing – responding to the incident being reported should take immediate priority;
- react in a calm and considered way but show concern;
- tell the child, adult at risk or third party that it is right for them to share this information;
- take what the child, adult at risk or third party has said seriously and allow extra time where there is a speech or language difficulty;
- keep questions to an absolute minimum necessary to gain a clear and accurate understanding of what is being said, and do not interrogate the child, adult at risk or third party;
- listen and do not interrupt if they are recounting significant events;
- offer reassurance;
- do not give assurances of confidentiality, but explain you will need to pass on this information to those that need to know; and
- consider whether immediate action is needed to protect a child or adult at risk who may have been harmed or be at risk of harm – think about the child or adult at risk who is the immediate concern and any others who may have been harmed or be at risk of harm, in light of what you have been told or seen.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the RAD and/or can occur between children outside of the RAD).

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms can take a variety of forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

- 2.8 In cases where there is an immediate risk of harm to a child or adult at risk and it is unsafe to wait until the next working day, either the person raising the concern or a DSO should immediately call an SSO (work mobile telephone numbers are listed in Appendix 6) who will have access to contact telephone numbers of other members of the Executive Board, the Head of HR and local social services, IPOC (Initial Point of Contact), Children Social Care or Adult Social Care, the LADO (Local Authority Designated Officer) and the Police. The Head of HR will be able to support the SSOs in contacting relevant colleagues (including relevant line managers).
- 2.9 If a DSO or SSO is not immediately available and a child is in immediate danger or at risk of harm you should alert the appropriate authority and stay with those you think are at immediate risk until they can be transferred to safe care, where practical.
- 2.10 When there are serious concerns about immediate risks to a child or if a child has suffered significant harm and continues to be at risk and an immediate referral is made to IPOC you should be prepared to give clear details of the concern, the child's name, date of birth, address and contact details for parents and carers. A referral in urgent circumstances can be made by telephone, but a completed Safeguarding Incident Form is required as soon as possible (even if some details need to be supplied at a later date.) See Appendix 4 for the Safeguarding Incident Report Form.

Responding to a safeguarding incident or concern involving a member of RAD staff, student, member, volunteer or visitor

- 2.11 If anyone has a concern about the behaviour of a member of RAD staff, student, member, volunteer or visitor, they should discuss this with their line manager, appropriate member of staff, DSO or SSO as soon as possible.
- 2.12 There will be occasions when a student, parent or other person makes an allegation against a member of RAD staff, an RAD student, member or volunteer which refers to concerns that the person has caused harm to a child or adult at risk, acted in a way that created potential serious risk to a child or adult at risk or would pose a risk of harm if they continue to work in regular or close contact with a child or adult at risk in their present position or in any capacity.
- 2.13 The majority of allegations against staff, students, members or volunteers will relate to their behaviour whilst working or studying. However, some concerns may relate to their personal life or the care of their own children. In some cases, there may have been an allegation of abuse regarding someone closely associated to them and this person may pose a risk of harm to the child(ren) of the staff member, student, member, volunteer or visitor is responsible for.
- 2.14 Line managers and members of staff who are notified of such concerns will be expected to report this to a DSO as soon as possible and ideally within the same working day.

- 2.15 All staff, students, members, volunteers and visitors should feel able to raise concerns about poor or unsafe practice, and know that these concerns will be taken seriously by SSOs and the Executive Board and will be dealt with sensitively and appropriately. It is not necessary for safeguarding concerns to be in writing (other than the Safeguarding Incident Report Form) in order for them to be acted upon.
- 2.16 Faculty of Education students, Step into Dance teachers, RADiate staff or any other member of RAD staff working in a partner school or other organisation must ensure that they are aware of the designated person for safeguarding in that organisation and familiarise themselves with the school or organisation's own Safeguarding or Child Protection Policy as soon as they commence work there.
- 2.17 Where the concern about the behaviour of a colleague, student, member, volunteer or visitor occurs in a partner organisation the report should be made to the designated person in that organisation and also to the DSO / SSO at the RAD. Where appropriate, the RAD SSO will liaise with the partner organisation to ensure that appropriate action is taken and followed up.
- 2.18 If a member of staff is concerned about their own line manager, they should report the matter to a member of the Executive Board or Head of HR who will liaise with the relevant SSO to make a decision on the course of action to be followed as set out above. If a member of staff has a concern about the conduct of an SSO or any member of the Executive Board (including the Chief Executive), they should report it to the Head of HR who will escalate the concern to the Chief Executive or Chair of the Board of Trustees as applicable. The Chair of the Board of Trustees is nominated to liaise with the Local Authority in the event of an allegation of abuse being made about the Chief Executive.
- 2.19 If a member of staff is concerned that appropriate action is not being taken about the conduct of a member of staff, student, member, volunteer or visitor they are able to raise their concerns as set out in the RAD Whistleblowing Policy and Procedures (available on SelectHR). The Whistleblowing Policy also refers to a "List of prescribed persons and bodies" which includes the NSPCC's contact details for concerns about children.
- 2.20 Where it is known that a member of RAD staff, an RAD student, visitor, volunteer or RAD member is under investigation by a third party or an appropriate authority, for actions that may have occurred either as a result of their work with the RAD or in their private life and which might give cause for concern about their suitability to work with children and adults at risk, this must be reported to an SSO, the relevant Head of Department and the Head of HR.

Reporting a safeguarding incident or concern

- 2.21 Make a comprehensive record of what is said or seen and actions taken at the earliest possible opportunity. Report this using the Safeguarding Incident Report Form within the timescales stated. The Safeguarding Incident Report Form is available on the RAD website, in Appendix 4 of this Policy and on SelectHR. In the RAD's main premises in London the forms are also available from Reception and from the Safeguarding notice board on the ground floor near the children and family changing rooms. If you have any concerns or need any advice or guidance about filling in an Incident Report Form then contact a DSO or SSO.

- 2.22 Incidents or concerns that occur outside the UK must be reported to the National Director, National Manager or Representative in the country in which the incident or concern occurs. The Safeguarding Incident Report Form should also be completed and sent to the relevant SSO in London who will liaise with the National Office with regard to necessary actions.
- 2.23 The comprehensive and confidential record and Safeguarding Incident Report Form should include the following:
- a detailed record of the incident in the child or adult at risk's own words or the words of the third party reporting it. You should note that there may be occasions when this record may be used later in a criminal trial and therefore needs to be as full and accurate as possible
 - details of the nature of the incident
 - a description of any injury (please note that you must not remove the clothing of a child or adult at risk to inspect any injuries)
 - dates, times or places and any other information that may be useful such as the names and addresses of potential witnesses; and
 - written records including emails and letters.

The Safeguarding Incident Report Form should be submitted to a DSO as soon as possible, preferably immediately, and certainly within 24 hours. If the concerns relate to a specific DSO, then it should be reported to an SSO.

- 2.24 For security and confidentiality reasons communication via email should be avoided wherever possible. Keep all original notes as they may be needed as evidence.
- 2.25 If the incident being reported is considered of low-level concern requiring no action other than monitoring, the appropriate box may be ticked on the Safeguarding Incident Report Form. In these circumstances the SSO will take this judgement into account and a referral to an appropriate authority will probably not be made.
- 2.26 The DSO will pass on any allegations to the SSO and to the Head of Department or departmental manager relevant to the incident, allegation or suspicion of abuse that has been made.
- 2.27 If the concerns relate to a specific SSO then the matter should be reported to the Chief Executive or if the concern relates to the Head of Department or departmental manager then it should be reported to their line manager / Director.
- 2.28 If the concern relates to a child or adult at risk abusing another child or adult at risk the process outlined in Appendix 3 should be followed.
- 2.29 If the concern relates to a child or adult at risk who is involved in an RAD activity in the UK but they normally reside in another country a referral may be made to the local authority with a request that it is also referred to Children and Families Across Borders (CFAB) a charity working to support children between the UK and other countries. CFAB

is the only UK charity with an inter-country social work team and they are able to manage international children's cases referred by social service providers.

- 2.30 Following decisions made by the SSO, the parents or guardians of the child(ren) or adult(s) at risk (where known / identified) may be contacted and if appropriate a referral made to the Children's or Adult Social Services, Multi-Agency Safeguarding Hub and/or LADO. There may be occasions where it is inappropriate for parents to be contacted and the matter will immediately be referred to Children's or Adult Social Services, IPOC and/or LADO.
- 2.31 In the event of an allegation related to a member of RAD staff or volunteer the LADO will be informed within 24 hours of the allegation being known. The criteria for making a referral to the LADO is that a member of RAD staff or volunteer may have
- behaved in a way that has or may have harmed a child
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates that they would pose a risk of harm to children.
- 2.32 The LADO offers a consultation service which supports those investigating an allegation or concern and provides expert advice. Every consultation with the LADO is followed up in writing to reflect the advice and guidance given. The RAD will keep a clear record of their correspondence with the LADO.
- 2.33 All members of RAD staff handling cases involving allegations against members of RAD staff, volunteers, students or visitors will recognise the need for, and must observe absolute confidentiality in these circumstances.
- 2.34 There may be occasions when it is appropriate for the child(ren)'s main school to be contacted, where these details are known.

Early intervention and help

- 2.35 When a child, adult at risk or family is or may be experiencing difficulties, support is most effective when it is provided as early as possible and Early Intervention can sometimes be appropriate.
- 2.36 When emerging problems are identified members of RAD staff, students, members, volunteers and visitors should liaise with the relevant DSO and SSO so that information can be shared with IPOC (or the Local Authority) so that where necessary an Early Help Assessment (EHA) can be conducted to identify the child or adult at risk's needs and enable professional support to be provided from other agencies.
- 2.37 When "Early Help" is provided and the RAD is made aware, they will monitor the situation and refer to IPOC if any further concerns arise or the child or adult at risk's situation does not improve.
- 2.38 Any child may benefit from "Early Help", but staff should be particularly alert to the potential need for support for any child or young person who

- is disabled and has specific additional needs
- has special educational needs
- is known to be a young carer
- is showing signs of being drawn into anti-social or criminal behaviour including involvement in serious youth violence, gangs or 'county lines'
- is frequently missing
- appears to be misusing drugs or alcohol
- appears to be at risk of modern slavery, trafficking or child exploitation
- is in a family circumstance which presents challenges for the child such as substance abuse, adult mental health problems or domestic abuse
- has returned to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited; or
- is a privately fostered child.

After a safeguarding incident or concern has been reported

- 2.39 The SSO will decide on any action to be taken, including whether to contact the parent, carer or guardian and / or refer the matter to an appropriate authority, and will ensure that the RAD complies in full with any resulting investigation.
- 2.40 Where an allegation, suspicion or incident, in the opinion of the SSO, is of low-level concern, does not require immediate referral to the relevant authorities but requires monitoring, no further immediate action will be taken other than to feed back to the relevant DSO.
- 2.41 Whether or not any referral is made, the SSO will monitor the situation and refer again if it appears that any concerns remain.
- 2.42 The LADO (within IPOC) has a specific role within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:
- behaved in a way that has harmed, or may have harmed a child;
 - committed a criminal offence against children, or related to a child; or
 - behaved towards a child or children in a way that indicates they are unsuited to working with children.

- 2.43 Depending on the outcome of any referral and where applicable, the RAD will refer a named individual for consideration for barring and will contact the Disclosure and Barring Service.
- 2.44 A member of RAD staff, student, member or volunteer under investigation will be prevented from working or otherwise interacting with children and adults at risk at the RAD and where applicable will have their RAD employment and / or RAD membership suspended, until the outcome of the investigation is known and a decision made.
- 2.45 A visitor to the RAD under investigation will not be permitted to enter RAD premises until the outcome of the investigation is known and a decision made.
- 2.46 A further course of action will be considered under the relevant code of conduct, Fitness to Practice procedure (Faculty of Education students) or the RAD's disciplinary procedures (employees).
- 2.47 There may be occasions where it is appropriate for information to be shared with other dance membership or accreditation organisations, when a referral is made related to an individual that may or may not be an RAD member.

Further advice and guidance

- 2.48 Remember, safeguarding is everyone's business and if anyone tells you, or if you see mistreatment or abuse or have concerns about a child, young person or adult at risk of being harmed, it is your role to respond sensitively and share information by alerting others who have a designated role within the RAD.
- 2.49 The seven golden rules of information sharing in Appendix 8 highlight that fears about sharing information cannot be allowed to prevent the need to safeguard and promote the welfare of children or adults at risk of harm or abuse. No one should assume that someone else will pass on information which may be critical to keeping a child or adult at risk safe.
- 2.50 Anyone who wishes to seek guidance from an external agency may contact the Police or Social Services Department (via the Multi Agency Safeguarding Hub or IPOC if applicable). Guidance and advice are also available from the NSPCC Helpline on 0800 800 5000, or Childline for children and young people on 0800 1111 or the Pan European number – 116 111 (whilst in Europe).
- 2.51 The Department for Education has also published "What to do if you're worried a child is being abused; Advice for practitioners 2015" which has information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice.
- 2.52 A quick guide to reporting procedures can be found in Appendix 5.
- 2.53 If you believe an incident has not been dealt with in accordance with these procedures, it should be reported to the Chair of the Safeguarding Committee in writing immediately.

3. RAD Code of Behaviour and Good Practice

- 3.1 The RAD believes that the Code of Behaviour and Good Practice will assist everyone in protecting children and adults at risk, and help with identifying practices which could be misinterpreted or lead to false allegations. Anyone organising activities on behalf of the RAD, involving children and/or adults at risk, must adhere to this code as set out below:
- 3.1.1 All children and adults at risk should be treated with respect.
 - 3.1.2 All children and adults at risk (including those with special educational needs) should be provided with an environment in which they can feel confident and able to discuss their concerns and have support with communication difficulties where needed.
 - 3.1.3 All activities (including examinations) involving children and adults at risk should include a ratio of one adult to every 10 children / adults at risk and one adult to every eight children / adults at risk for trips. For younger children under the age of nine, there should always be at least one additional member of staff (e.g. a teacher, pianist or assistant). Where this is not possible, the RAD will ensure that activities take place within sight or hearing of other adults.
 - 3.1.4 All activities (and particularly those involving children and adults at risk) are subject to regular risk assessment (see Health and Safety Policy). Assessed risks are managed appropriately and staff provided with the relevant information to support safety and wellbeing of children, adults at risk and staff.
 - 3.1.5 Respect should be given to a child's or adult at risk's rights to personal privacy.
 - 3.1.6 Physical contact with a child or young person may be misinterpreted and should be avoided. Where any physical touching is required for purposes of instruction, it should be provided openly in front of other students. Parents, guardians and students will be warned in advance that physical touching may be required for correctional purposes only.
 - 3.1.7 Feedback should always be constructive rather than negative, and language used should never be threatening or upsetting.
 - 3.1.8 Private or unobserved contact with a young person or adult at risk should be avoided wherever possible unless authorised on the appropriate consent form by a parent or guardian and recorded (e.g. for a 1:1 private dance lesson).
 - 3.1.9 Children with special educational needs / disabilities may be especially vulnerable to abuse (including from their peer group) and extra care should be taken to interpret apparent signs of abuse or neglect. They may be disproportionately impacted by behaviour such as abuse or bullying without outwardly showing any signs due to communication barriers.
 - 3.1.10 Assumptions should not be made that indicators of abuse (e.g. behaviour, mood and injury) relate to a child's disability or learning difficulty without further exploration.

- 3.1.11 If first aid is required, where possible, it should be administered by a trained first aider in the presence of another adult. Amongst the team of first aiders there are two first aiders who are trained in Paediatric First Aid available on RAD premises for children under 8 years old. There are also two trained Mental Health First Aiders. A First Aider will complete a Safeguarding Incident Report Form if they have any safeguarding concerns as a result of administering the first aid.
- 3.1.12 The RAD has Changing Room Guidelines which are designed to provide a safe environment in which children and adults at risk can use RAD facilities. Staff should encourage children, young people, parents, guardians and carers to follow this guidance, which is available at www.rad.org.uk/more/facilities
- 3.1.13 The Changing Room Guidelines prohibit the use of telephones, cameras or other photographic or filming devices being used in changing rooms or toilet facilities.
- 3.1.14 Written parental or guardian consent should always be obtained by the RAD for the use of any photographs, film or videos involving children and adults at risk. This should clearly indicate the uses to which the photographs, film or videos will be put. More information and guidance on this is outlined in Section 7.
- 3.1.15 RAD staff, Faculty of Education students, students, volunteers and visitors to the RAD where appropriate, should challenge unacceptable behaviour in accordance with the provisions of this Code of Conduct and Good Practice.
- 3.1.16 Any incidents, allegations or suspicions of abuse should be reported immediately to a DSO, as per the reporting guidelines laid out in Section 2 and Appendix 5.
- 3.1.17 In all dealings with children and adults at risk, RAD staff, Faculty of Education students, students, volunteers and visitors to the RAD where appropriate, should never:
- leave children who are in their care unsupervised on RAD premises;
 - play rough, physical or sexually provocative games, involving or observed by children or adults at risk whether based on talking or touching;
 - share a room overnight with a child or adult at risk;
 - enter the private room of a child or adult at risk unless it is absolutely necessary and, wherever possible, accompanied by another adult;
 - allow or engage in any form of inappropriate physical activity involving children or adults at risk, or any bullying of a child by an adult or another child;
 - form or seek to form relationships of a sexual nature which may lead to sexual activity (i.e. 'grooming');
 - allow children or adults at risk to use inappropriate language (e.g. of a derogatory or sexually explicit nature) without challenging it;
 - make sexually suggestive or discriminatory comments even in jest;

- intentionally reduce a child or adult at risk to tears as a form of control;
- use any physical punishment as part of disciplining a child or adult at risk;
- shout or use harsh criticism;
- consume alcohol or take drugs during the working day (including breaks) or when involved in activities with children or adults at risk;
- give their personal contact details to a child or adult at risk whom they have met through work including via social networking sites (see RAD's Social Media and Digital Communications Policy);
- allow themselves to get into a situation where an abuse of trust may occur – this means not forming a close personal relationship (sexual or otherwise) with a child or adult at risk, even if they are seeking and are consenting to such a relationship;
- transport a child or adult at risk in a personal vehicle unless consent has been given by a parent or guardian – where this is necessary in an emergency, a DSO must be informed;
- allow allegations made by a child or adult at risk to go unrecorded or not acted upon in accordance with these or other RAD procedures; or
- undertake personal activities (such as washing or dressing) for a child or adult at risk which they can do for themselves. If a child has a disability, such tasks should only be performed with the full understanding and consent of and, where appropriate, assistance from the parents or carers. An adult at risk may be able to give their own consent.

3.1.18 Any incidents which cause concern in respect of a child or an adult at risk must be reported immediately to a DSO. Below are examples of incidents which are to be reported. When

- a child or adult at risk has been left unsupervised on RAD property / premises;
- a child or adult at risk is hurt accidentally;
- there is a concern that a relationship is developing which may be an abuse of trust;
- you are worried that a child or adult at risk is becoming attracted to you;
- you are worried that a child or adult at risk is becoming attracted to a colleague who cares for them;
- you think a child or adult at risk has misunderstood or misinterpreted something you have done;

- you have been required to take action to prevent a child or adult at risk from harming themselves or another, or from causing significant damage to property. Unless you have received specific training on how to restrain a child or adult at risk, this should only be done as a last resort. Do not do it alone, call for assistance, write up what happened and pass the information to a DSO;
- you see any suspicious marks on a child or adult at risk;
- you hear of any allegations made by a child or adult at risk or any other person relating to events giving rise to a safeguarding concern either inside or outside of the RAD which have happened recently or in the past;
- a child, adult at risk or older student discloses that they have been a victim of female genital mutilation (FGM) or are going to be in the future;
- you are concerned that a child, adult at risk or older student is being drawn, or may be at risk of being drawn, into terrorism or extremism;
- you are concerned that a child or adult at risk or older is being subjected to violence in the name of honour; or
- a child, adult at risk or older student discloses that they have been a victim or, or are involved in serious violent crime (including) 'county lines'.

3.2 All RAD staff are briefed by their line manager or equivalent as to the expectations in the RAD Code of Behaviour and Good Practice as part of their induction or before any activities on behalf of the RAD, involving children and/or adults at risk, take place. These people will also assist in the event that anyone suspects or is made aware of an incident suggesting that the RAD Code of Behaviour and Good Practice is not being adhered to. Such incidents should be reported to a DSO.

3.3 Any external hirers or contractors must adhere to the RAD Code of Behaviour and Good Practice as part of their contractual arrangement. A DSO must be informed if such personnel are going to be present during activities or training provided by the RAD. They will also be required to sign a declaration stating that the organisation has its own safeguarding policy and procedures. Informing external hirers or contractors about the RAD Code of Behaviour and Good Practice and obtaining and storing the signed declaration is the responsibility of the Head of Department agreeing to the external hire or other contract.

4. Senior Safeguarding Officers, Designated Safeguarding Officers and the Safeguarding Committee

4.1 The RAD has a structure in place to deal with incidents. There are at least two Senior Safeguarding Officers (SSOs) who are members of the Executive Board. These have overriding responsibility for dealing with all safeguarding incidents in consultation with relevant staff or external agencies. Reporting to SSOs are Designated Safeguarding Officers (DSOs) who are RAD employees working in different departments. In most cases, DSOs deal with all safeguarding incidents as the first point of contact. In some cases, incidents may immediately be referred to an SSO.

- 4.2 The details of all named SSOs and DSOs along with a full description of their roles and responsibilities can be found in Appendix 6. This list is updated annually or in the event of a person stepping down from their position as SSO or DSO, for example because they change their job role or leave the RAD.
- 4.3 There is a Safeguarding Committee chaired by a member of the Executive Board that has operational responsibility for safeguarding and Prevent arrangements and policy. The Safeguarding Committee audits this Policy to ensure it is working effectively, that all incidents are recorded, action is taken and best practice is in place, and reports, through the Chair of the Safeguarding Committee to the Executive Board and the Board of Trustees.
- 4.4 The Safeguarding Committee Terms of Reference and Standing Orders are published separately and are available on SelectHR

The Safeguarding Committee has agreed a number of key objectives:

- to understand the RAD's obligations for safeguarding and Prevent under UK Government legislation;
- to make sure protecting people from harm is central to the RAD's culture in all its activities worldwide, at London HQ and with and through its National Offices;
- to manage safeguarding and Prevent risks through developing, monitoring and reporting on a Risk Register and associated actions;
- to gather input from all departments and National Offices;
- to review the Safeguarding Policy and Procedures on an annual basis for approval by the Board of Trustees;
- to seek advice and independent consultancy on safeguarding from external specialist individuals or organisations;
- to develop and implement a safeguarding and Prevent training policy; and
- to monitor and report on the effectiveness of the RAD's safeguarding and Prevent arrangements.

5. Recruitment, selection and vetting

- 5.1 As part of its commitment to safeguarding, the RAD will ensure that safe practice is integrated into all recruitment, selection, vetting and induction processes.
- 5.2 The RAD has policies on the vetting of all staff, including criminal record checks (where necessary) and referencing, the recruitment of ex-offenders and the secure storage, use, retention and disposal of disclosures and disclosure information. These policies inform this Safeguarding Policy and can be found on the RAD SelectHR system and the RAD website.

- 5.3 The RAD uses the Disclosure and Barring Service (DBS) in the UK for criminal record checks and follows its advice with regard to requirements in relation to vetting and checking staff. Details are in the Recruitment and Selection Policy and Procedures (available on SelectHR and the RAD website). Accompanying internal guidance on recruitment and selection is available on SelectHR.
- 5.4 Young people under the age of 18 years will not be employed in positions where they are responsible for teaching or supervising children and students under the age of 18 years.
- 5.5 People and organisations that hire Royal Academy of Dance premises to run their own activities will be required to sign a declaration stating that their paid staff and volunteers (as appropriate) have had the necessary disclosure and barring checks where they are carrying out 'Regulated Activity'. For the avoidance of doubt, this means that anyone who will be working with participants below the age of 18 or adults at risk in any capacity (including but not limited to teachers, instructors, accompanists, chaperones etc.) must hold an appropriate Enhanced Disclosure from the Disclosure and Barring Service. This requirement applies whether parents, guardians and/or carers are present during the activities or not.

6. Training and support

- 6.1 The RAD is committed to providing appropriate training to staff. A detailed Safeguarding and Prevent Training Policy, including induction, awareness and safeguarding /child protection and Prevent training arranged and delivered from the London HQ is in Appendix 7. National Offices worldwide must arrange their own induction, awareness and safeguarding /child protection training at a similar appropriate level.
- 6.2 The Director of Education completes annual Prevent awareness training in the role as "Prevent Lead" as part of the duty to protect children, older students and adults at risk from radicalisation. The Chair of Trustees, some members of the Board of Trustees and the Chief Executive Officer are identified as "Key Individuals" under the Prevent Duty as listed in Appendix 6.
- 6.3 The RAD recognises that staff (including SSOs and DSOs) dealing with safeguarding issues may find situations stressful or upsetting. We ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have. Staff needing support should speak with their line manager or the HR Department.
- 6.4 A report of progress on training completion under the Safeguarding and Prevent Training Policy for all staff worldwide who are required to complete training is reviewed at each Safeguarding Committee as a standing agenda item.

7. Photography and filming of children and/or adults at risk

- 7.1 No filming or photography of children or adults at risk should take place without gaining written permission from the appropriate parent, guardian or carer. The purposes for which any photographic images or film will be used should be clearly explained and outlined on the disclaimer document. All written consent obtained must be placed securely on file.

- 7.2 Use of photography and film including children and adults at risk is set out in the RAD's Social Media and Digital Communications Policy and separate Visual Media Policy which provide more detailed information as to how visual media should be procured, presented and protected.
- 7.3 There is evidence that some people do use activities and events as an opportunity to take photographs or footage of children and/or adults at risk, including those with disabilities, with the intention to use them inappropriately or manipulate them.

8. Project Tearose

- 8.1 Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm.
- 8.2 Project Tearose is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools. The RAD has signed up to this agreement for the purposes of the RAD Dance School in Battersea.
- 8.3 If police have responded to a domestic incident and there are children in the family, the officers working on Project Tearose will disclose this incident to the SSOs or specific DSOs the following morning (next working day). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details. The information is shared in order to ensure the safety and wellbeing of the child, and so that support can be offered to the child if necessary. The RAD is part of the network available to support the family and child.
- 8.4 The information is likely to be sensitive and confidential and is stored, handled and destroyed in accordance with RAD Information Management Policy and Procedures.

9. Research

- 9.1 Research activity undertaken by Faculty of Education students or any other member of RAD staff that involves contact with children or adults at risk is considered as part of the Faculty of Education research ethics procedures. Where appropriate, referral may be made to the Faculty of Education Ethics Committee in order to establish if there are any specific practices to be followed in relation to safeguarding the welfare of children or adults at risk. The Faculty of Education Ethics Committee membership includes one of the SSOs, who is also the Prevent Lead.

10. Data handling, monitoring and evaluation

- 10.1 Details of any incidents relating to safeguarding children and adults at risk or Prevent are collated by SSOs and kept in a secure central record within the Human Resources Department. This will include all concerns, discussions and decisions made and the reasons for those decisions. Copies of these records will be passed as necessary to the appropriate authority.

- 10.2 In addition to the central record, where an incident has been reported against a member of RAD staff or a volunteer, a note relevant to the incident and/or any relevant documents will also be kept securely in the personal file of the person concerned when the case has been concluded.
- 10.3 In addition to the central record, where an incident is reported against a Faculty of Education student, a note relevant to the incident and/or any relevant documents will also be passed to the Registrar to be kept securely in the student's record.
- 10.4 In addition to the central record, where an incident is reported against an RAD member, a note relevant to the incident will be passed to the Head of Global Membership to be kept securely against their membership record.
- 10.5 Where an allegation was made against a visitor to the RAD, records will be kept securely by the Head of Human Resources.
- 10.6 Incidents will be reported confidentially in an anonymous form to the Safeguarding Committee and the Board of Trustees at their meetings. Any concerns or patterns that emerge will be identified and dealt with appropriately by the Safeguarding Committee.
- 10.7 All records will be kept in accordance with the RAD's Information Management Policy and Procedures, including relevant retention schedules and arrangements for locked secure storage.
- 10.8 In order to monitor this Policy, the Safeguarding Committee reviews reports on the status of the Safeguarding Policy and its application, including training completion, for each of its National Offices and for Safeguarding incidents worldwide at each of its quarterly meetings. In addition, the Safeguarding Committee reviews the Risk Register and associated actions at each of its quarterly meetings. The Safeguarding Committee reports form the basis of the Annual Safeguarding Report to Trustees on incidents, policy compliance, training completion and progress on risk management.

11. Review of policy and procedures

- 11.1 The Policy is reviewed by the Safeguarding Committee, SSOs, DSOs, the Executive Board and the Board of Trustees annually or more frequently in response to new legislation or where an incident has occurred that requires an adjustment to processes within. It will be reviewed externally where it is considered necessary, to ensure that the Policy continues to meet the safeguarding legislation and best practice.

12. Signature



Chair of the Board of Trustees, Royal Academy of Dance

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Appendix I

Types and definitions of abuse

I. Children

The statutory guidance document '*Working Together to Safeguard Children*' (2018) defines four areas of abuse relating to children. This guidance covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. The definitions are also from the guidance '*Keeping children safe in Education*' (2020) and are as follows:

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse: A form of abuse that 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: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability, as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

It is important to recognise that many children will be living (or may have lived) in families where **domestic abuse** is a factor and that these situations have a harmful impact on children emotionally, as well as placing them at risk of physical harm.

Sexual abuse: This 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, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual images, 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: 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. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2. Adults at risk

The following definitions of abuse relating to adults at risk (formerly known as vulnerable adults) are from *No Secrets*, Department of Health 2000 and from the 1997 Consultation 'Who Decides' issued by the Lord Chancellor's Department.

What constitutes abuse? The term 'abuse' can be subject to wide interpretation. The starting point for a definition is the following statement: *abuse is a violation of an individual's human and civil rights by any other person or persons.*

The core definition of a 'vulnerable adult' (now referred to as adult at risk) taken from the above Consultation is a person "who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation." This definition covers all people over the age of 18 years.

Consideration, however, needs to be given to a number of factors:

- abuse may consist of a single act or repeated acts
- it may be physical, verbal or psychological
- it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent; and
- abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Abuse can happen anywhere:

- in a person's own home
- in a residential or nursing home
- in a hospital
- in the workplace
- at a day centre or educational establishment
- in supported housing; or
- in the street.

Who can abuse? The person responsible for the abuse is often well known to the victim, and could be:

- a paid carer in a residential establishment or from a home care service
- a social care worker, health worker, nurse, doctor or therapist; or
- a relative, friend or neighbour.

The following are the main different forms of abuse in relation to an adult at risk:

Physical abuse: includes hitting, slapping, pushing, kicking, scratching, biting, burning, misuse of medication, restraint or inappropriate sanctions

Sexual abuse: including rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent or was pressured into consenting

Psychological abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks

Financial or material abuse: including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits

Neglect and acts of omission: including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and

Discriminatory abuse: including racist, sexist, based on a person's disability, and other forms of harassment, slurs or similar treatment.

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

Incidents of abuse may be multiple, either to one person in a continuing relationship or service context or to more than one person at a time. This makes it important to look beyond the

single incident or breach in standards to underlying dynamics and patterns of harm. Some instances of abuse will constitute a criminal offence. In this respect adults at risk are entitled to the protection of the law in the same way as any other member of the public.

In addition, statutory offences have been created which specifically protect those who may be incapacitated in various ways. Examples of actions which may constitute criminal offences are: assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.

Criminal offences: These offences differ from all other non-criminal forms of abuse in that the responsibility for initiating action rests with the Police and the Crown Prosecution Service. Also, when complaints about alleged abuse suggest that a criminal offence may have been committed, it is imperative that reference should be made to the police as a matter of urgency.

3. Bullying

The Anti-Bullying Alliance defines bullying behaviour as follows:

- deliberately causes hurt (either physically or emotionally)
- repetitive (though one-off incidents such as the posting of an image on the internet, or the sending of a text or sexting (sexually explicit photographs or messages) which is then forwarded to a group, can quickly become repetitive and spiral into bullying behaviour); and
- involves an imbalance of power (the person on the receiving end feels like they cannot defend themselves).

Bullying is not:

- the playful exchange of teasing remarks between friends without intention to cause hurt;
- falling out between friends after a quarrel or disagreement; or
- behaviour that all parties have consented to and enjoy (though this needs to be carefully monitored as coercion can be very subtle).

Bullying can take the following forms:

- emotional – being unfriendly, ignoring someone, not involving them in activities, sending hurtful or tormenting texts, humiliating or ridiculing someone
- physical – pushing, kicking, hitting, punching or pinching or any use of violence
- racist – racial taunts, graffiti or gestures
- related to a disability – because of how somebody looks or presents related to their disabilities (children with disabilities are more likely than their non-disabled peers to be excluded from activities)

- sexual – unwanted physical contact or sexually abusive comments (sexual bullying can also relate to gender and gender identity and includes those who do not fit with the gender role prescribed to them)
- homophobic – because of, or focusing, on the issue of a young person’s actual or perceived sexual orientation;
- verbal (in the case of children with hearing disabilities this can take place in sign language) – name calling, sarcasm, spreading rumours or teasing; or
- online/cyber – posting on social media, sharing photos, sending nasty texts messages, social exclusion.

Bullying behaviour should not be passed off as “banter” or as “part of growing up”

It is important to be conscious that a child who is engaging in bullying or abusive behaviour towards others may have been subject to abuse from other children or adults. There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This should be kept in mind when dealing with and managing case of abuse perpetrated by children.

4. Self-harm

Self-harm is where a person hurts themselves intentionally. This can occur in a range of ways:

- cutting (usually with a knife or razor)
- burning their body
- banging their head (not to be confused in situations when working with a young person who may have additional (special) needs, but this could be an indicator)
- throwing their body against something hard
- punching themselves
- sticking things in their body; or
- swallowing inappropriate objects or tablets

5. Eating disorders

Eating disorders are not just about food – they are a way of coping with emotional distress. They can affect both sexes, people of any background and any age.

Eating disorders can be recognised by a persistent pattern of unhealthy eating or dieting behaviour that can cause health problems and/or emotional and social distress.

There are three official categories of eating disorders:

- anorexia nervosa
- bulimia nervosa; and
- eating disorder not otherwise specified (EDNOS).

People with EDNOS do not have the full set of symptoms for either anorexia or bulimia but may have aspects of both. EDNOS is as serious as other eating disorders and as potentially damaging to health.

Anorexia nervosa:

- the rarest – typically affects young people aged 12-20 years
- individuals with anorexia nervosa do not maintain or have a body weight that is normal or expected for their age and height – they are usually less than 86% of their expected weight
- even when underweight, individuals with anorexia continue to be fearful of weight gain. Their thoughts and feelings about their size and shape have a profound impact on their sense of self-esteem as well as their relationships
- women with anorexia often stop having their periods
- they often do not recognise or admit the seriousness of their weight loss and deny that it may have permanent adverse health consequences.

Bulimia nervosa:

- mainly affects individuals between the ages of 18-25 years
- individuals with bulimia nervosa experience binge-eating episodes which are marked by eating an unusually large amount of food within a couple of hours, feeling compelled to eat and find it difficult if not 'impossible' to stop eating
- this is then followed by attempts to 'undo' the consequences of the binge by using unhealthy behaviour such as self-induced vomiting, misuse of laxatives, enemas, diuretics, severe caloric restriction or excessive exercising
- individuals are obsessed and preoccupied with their shape and weight and often feel their self-worth is dependent on their weight or shape.

Binge-eating disorder:

- individuals with binge-eating disorder (BED) engage in binge eating, but do not regularly use inappropriate or unhealthy weight control behaviour such as fasting or purging to counteract the binges
- BED is more common amongst individuals who are overweight or obese, terms used to describe these problems include: compulsive overeating, emotional eating or food addiction
- BED is not an officially recognised disorder, but is included in the EDNOS category

Eating problems never exist in isolation; they are usually a symptom of other problems e.g. coping with painful feelings and/or situations, boredom, anxiety, anger, shame, sadness, loneliness. Adolescence can be a key time. Stressful or traumatic events can trigger an eating problem (e.g. bullying, bereavement, family tensions, school problems, self-harm, low self-esteem, sexual, physical, emotional abuse or neglect, negative criticism, fragile sense of self) and it can be more about control than about food itself.

More information is available on: www.b-eat.co.uk

6. Female genital mutilation (FGM)

Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

People working with children and adults at risk should be alert to the possibility of a girl being at risk of FGM or already having suffered FGM and **must** report all suspicions or known cases to the relevant authorities.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted in the Serious Crime Act 2015) places a statutory mandatory duty upon teachers (along with other social workers and healthcare professionals) to report to the police where they discover through disclosure by the victim or visual evidence that FGM appears to have been carried out on a girl under 18 years old. Staff should also follow normal safeguarding procedures including completing an incident form, referring to a DSO / SSO, and the SSO to refer to IPOC or local authority as applicable.

7. Child criminal exploitation

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country ('county lines', see below for more information), forced to shoplift or pickpocket, or to threaten other young people.

8. Child sexual exploitation

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly consensual relationship where sex is exchanged for gifts, to serious organised crime by gangs or groups. The perpetrator

always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

9. Serious Youth Violence (including knife/gun crime and 'county lines')

Offences such as homicides, knife and gun crime are key factors in serious violent crime and account for 1% of all recorded crime. The operation of 'county lines' are also frequently connected to serious violent crime. 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the 'county lines' offending model with children and vulnerable adults exploited to move and store drugs and money.

Serious youth violence is tackled by a multi-strand approach including different stakeholders and sectors (including education.) Recognising and responding to potential vulnerability and providing early effective support are crucial in the education context.

The RAD is aware of indicators that may signal that children, or adults at risk, are at risk, or are involved with, serious violent crime (including county lines). This may include absence, change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that individuals have been approached by, or are involved with, individuals associated with criminal networks or gangs.

The potential link between child exploitation and serious youth violence is also understood.

Victims will be offered appropriate support and criminal activity will be reported to the police.

10. Radicalisation

The RAD is committed to safeguarding the welfare of its students and staff and to meeting its duty under the Counter-Terrorism and Security Act 2015 and the UK Government's associated Prevent strategy. Where possible the RAD will intervene to support children, students, adults at risk and staff from being radicalised.

Whilst there is a low risk of extremist activity at the RAD our duty of care to children, adults at risk, students and staff is of the utmost importance.

Radicalisation refers to the process by which a person or group of people come to adopt increasingly extreme political, social or religious ideals. The outcome of radicalisation can be both violent and non-violent and is reflected in vocal or active opposition to fundamental British values (including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs). The definition of extremism also includes calls for the death of members of British armed forces, whether in this country or overseas.

The process of radicalisation has multiple pathways. Identification of individuals who are likely to be susceptible to extremism can happen in many different ways. Background factors, which are often, reinforced by family, friends or online, and/or combined with specific needs for which an extremist or terrorist group may appear to provide an answer, may contribute to vulnerability. The internet and use of social media in particular has become a major factor in radicalisation of young people.

Staff should be alert to changes in children, students, adults at risk and colleagues' behaviour which could indicate that they may be in need of help or protection. If you have any concerns regarding children, students (including Faculty of Education students) and/or colleagues who might be at risk of radicalisation please report the concern using the normal safeguarding Incident Report Form and associated procedure. An SSO may then make a referral to the appropriate authorities (including Channel and/or IPOC, where applicable.)

11. Violence in the name of honour

Violence in the name of honour is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, violence in the name of honour might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged or forced marriage; or
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

Girls are the most common victims of violence in the name of honour; however, it can also affect boys. Crimes of 'honour' do not always include violence. Crimes committed might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage (as opposed to arranged marriage – see note below)
- being held against your will or taken somewhere you don't want to go
- assault

A forced marriage is one that is carried out without the consent of both people. This is very different to an arranged marriage, which both people will have agreed to.

12. Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. It will undoubtedly affect their attainment and performance.

Sexual violence and sexual harassment exist on a continuum and the two things may overlap. They can occur online and offline (both physically and verbally) and are never acceptable.

This type of behaviour is not an inevitable part of growing up, or just banter, “having a laugh” or “boys being boys”

Sexual harassment can include “upskirting” (see glossary) which is a criminal offence under the Voyeurism Act 2019.

Incidents of all of the above will be taken seriously and responded to robustly. Victims will be offered appropriate support and criminal activity will be reported to the police.

It is the responsibility of individual staff and volunteers to ensure that the relationship they develop with children or students cannot be misinterpreted or developed beyond the professional. It is an offence for anyone in a position of trust and authority in relation to a young person to have a sexual relationship with a child or young person up to the age of 18.

Appendix 2

Guidance on recognising signs of abuse

I. Physical abuse

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- parents / carers are uninterested or undisturbed by an accident or an injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments; and
- reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation is provided:

- bruising in or around the mouth, which may indicate force-feeding
- two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- repeated or multiple bruising on the head or in places unlikely to be injured accidentally
- variation in colour possibly indicating injuries caused at different times
- the outline of an object used e.g. belt marks, hand prints or a hair brush
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks on small children; and
- bruising on the arms, buttocks and thighs (may be an indicator of sexual abuse).

Bite marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent in shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and this will always require experienced medical opinion. Any burn with a clear outline may be suspicious, e.g.:

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- linear burns from hot metal rods or electrical fire elements
- burns of uniform depth over a large area
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation; or
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet (indicative of dipping into a hot liquid or bath).

Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent with the fracture type
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement; or
- there is an unexplained fracture in the first year of life.

Scars

A large number of scars, or scars of different sizes or ages, or on different parts of body, may suggest abuse

Behavioural indications

Some children may behave in ways that alert you to the possibility of physical injury, for example:

- withdrawal from physical contact
- fear of returning home
- self-destructive tendencies towards others.

2. Emotional abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- aggressive behaviour towards others
- scape-goated within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a 'loner' – difficulty relating to others
- over-reaction to mistakes
- fear of new situations
- inappropriate responses to painful situations
- neurotic behaviours
- self-harming; or
- running away

Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- failure by parents or carers to meet basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- listless, apathetic and unresponsive with no apparent medical cause
- failure to grow within normal expected pattern, with accompanying weight loss
- thrives away from home environment
- frequently absent or late
- left with adults who are intoxicated or violent
- abandoned or left alone for excessive periods; or
- compulsive stealing or scavenging

Sexual abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate for the child's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorder, self-mutilation and suicide attempts)
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- concerning changes in behaviour or general presentation
- regressive behaviour

- distrust of a particular adult
- unexplained gifts of money
- sleep disturbances or nightmares
- phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- pain or itching of genital area
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- wetting or soiling

Appendix 3

Procedure for dealing with abuse between children / adults at risk

1. Where an instance of child on child or adult at risk on adult at risk abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, the normal reporting procedures should be followed including, where appropriate, referral to appropriate authorities in respect of both children or adults at risk involved.
2. The interests of the identified victim must always be considered of paramount importance.
3. Where the allegation relates to an incident that took place within the RAD or relates to two RAD students or adults at risk, the following should happen:
 - keep the involved children or adults at risk separate during the remainder of the activity or classes taking place to avoid collusion or intimidation
 - establish what is alleged to have taken place and then avoid talking to the children or adults at risk any further about the incident
 - keep a detailed log of actions, discussion and decisions (using the Incident Report Form)
 - consider the risks of the abuse being repeated. Ensure that non-teaching times are considered, especially when students are moving around the RAD or are unsupervised in changing rooms as the child or adult at risk who has been harmed may feel particularly vulnerable at such times
 - be aware that whether the incident(s) happened at the RAD or elsewhere, other RAD students may know what has happened (or is alleged to have happened). Other children / adults at risk may have been involved, either directly or indirectly
 - parents of all those known to have been involved should be contacted, unless after referral to authorities advice is given that this would not be appropriate e.g. for complex cases or in the case of sexual exploitation; and
 - consideration should be given to whether the situation warrants information being shared with other RAD parents/guardians (anonymously) e.g. where media coverage is likely
4. The decision as to whether or not the behaviour directed at another child or adult at risk is harmful is dependent on the individual circumstances. The following considerations may apply:
 - the relative chronological and developmental age of the children / adults at risk involved
 - whether the alleged abuser is supported or joined by other RAD (or non-RAD) children or adults at risk

- any differentials such as race, gender, or physical, emotional or intellectual vulnerability of the victim
 - the actual facts of the behaviour
 - whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
 - the degree of coercion, physical aggression, intimidation or bribery
 - the victim's experience of the behaviour and the impact it is having on them
 - attempts to ensure secrecy
 - duration and frequency of the behaviour.
5. In cases where the abuse is considered serious enough to refer to the authorities, the case will be dealt with for each child / adult at risk separately.
 6. If the investigation / assessment by the relevant authorities concludes that allegations are substantiated, the children or adults at risk should not be expected to attend RAD activities together and where possible children / adults at risk should be separated in classes / activities.
 7. Depending upon the severity of the abuse, it is possible that the child / adult at risk responsible for the abuse will be asked to leave RAD activities and/or not be permitted to attend future classes / events.
 8. The views and wishes of the harmed child / adult at risk and their parents, guardians, carers should be appropriately considered in the decision making.

Appendix 4

Safeguarding Incident Report Form

Your details:

Name:	
Job title:	
Knowledge of and relationship to the child/adult at risk (where known / relevant):	
Knowledge of and relationship to the (alleged or potential) abuser (where known / relevant):	
Contact address (if not an employee of the RAD):	
Telephone number(s):	
Email:	
Date you first became aware of the incident:	
If you did not witness the incident yourself, explain how you became aware of it:	

Child / adult at risk details (as known / relevant):

Full name:	
Date of birth:	Gender:
Home address:	
Telephone numbers(s):	
Details of disability (if applicable):	
Parent / guardian’s names and contact details:	
Social / care workers’ names and contact details:	

Details of any previous allegations / incidents involving this child / adult at risk (where known):

Incident details (complete as far as possible based on known / relevant information):

Location:	Date and time:
<p>Detailed information / description of incident.</p> <p><i>The information you supply will be reviewed by a DSO and/or SSO who will not be familiar with what has happened and will be relying upon what you write to make a decision about how the incident should be dealt with. Please</i></p> <ul style="list-style-type: none"><i>include as much detail as possible</i><i>use language carefully and precisely</i><i>use the words of the child / adult at risk where applicable.</i><i>refer to other incident forms completed by you or your colleagues about the same incident if you are aware of them, particularly if an incident or situation develops over time</i><i>include details of any observations made by you or to you (e.g. description of visible bruising, other injuries, child/adult at risk's emotional state)</i><i>make a clear distinction between fact and hearsay.</i><i>use the reverse of the form or blank paper to add continuation sheets if necessary</i>	

Were there any witnesses to the incident? If yes, please give details, including names and where applicable job titles:
Have the parents / carers of the child / adult at risk been informed? If yes, give details and if not, state the reason:
Other actions (including safeguarding measures) taken so far:
Please tick if this is considered a low-level concern that you feel is unlikely to require action other than continued monitoring: <input type="checkbox"/>

Alleged / potential abuser's details (as known / relevant):

Full name:	
Date of birth/age:	Gender:
Relationship with child / adult at risk:	
Home address:	
Telephone numbers(s):	Disability (if applicable):
Occupation / role / job title:	
Name and address of the place where the person works:	
Is the alleged / potential abuser an RAD employee, staff member or volunteer? (If yes, state applicable category):	

If the alleged / potential abuser is an RAD employee, staff member or volunteer complete as much of this section as possible and/or seek the advice of the HR team:

Length of service in current post:
Has the person had a DBS check? If yes, when was the most recent one completed, and was it clear?
Details of any previous allegations, complaints or concerns in relation to this person (not necessarily safeguarding related):
Does this person work with children / adults at risk in any other capacity? If yes, please give details:
Does the person have children of their own? If yes please give any known details:
Is the person aware that an allegation, complaint or concern has been raised?

Referrals related to RAD employees, staff member or volunteers must be made to IPOC via email and followed up with a telephone call to the Duty LADO officer

Please ensure that you have completed all sections of the form before submission.

I acknowledge that the information provided on this form is complete and accurate as far as I am aware.

I acknowledge that the information will remain strictly confidential between myself and the appropriate reporting channels.

Signed.....

Date.....

Please submit this form immediately to a DSO (if you are not a DSO yourself) or an SSO. A full list of DSOs can be found in Appendix 6 of the RAD Safeguarding Policy and Procedures.

To be completed by SSO reviewing the case

Name and signature of SSO:

Date:

Note of action taken:

Further updates (with dates):

External agencies contacted:

AGENCY	CONTACT NAME	CONTACT NUMBER	DATE	TIME	ADVICE RECEIVED
Police					
Wandsworth IPOC					
Other local authority services <i>(give details)</i>					
LADO <i>(state authority)</i>					
NSPCC					
Charity Commission					
Ofsted					
Ofqual					
Channel					
CFAB					
Other <i>(give details)</i>					

Appendix 5

A quick guide to reporting procedures (full details in Section 2)

If you see, hear of or suspect abuse, are aware of serious poor practice or have concerns about a breach of the RAD code of behaviour in relation to a child or an adult at risk follow the steps below.

1

If concerned about a child or adult at risk – report your concern to a DSO/SSO within 24 hours. If this is not possible and if there is an immediate risk, report it to the appropriate authority, e.g. police, NSPCC, IPOC/MASH, children’s social care or adult social care (social services)

2

Record the details of the abuse/allegation/suspicion using the RAD Safeguarding Incident Report Form as soon as possible and within the same day. Record accurately what the child/young person or adult at risk has said or what has been seen or reported

3

Include information about how the child or adult at risk appeared (e.g. angry/upset etc), recording any visible signs e.g. burns/ bruises. Do not ask the person to remove clothing. Do not ask leading questions or investigate.

4

Pass the completed Safeguarding Incident Form to a DSO (if you are not a DSO yourself). The DSO will offer advice as required and forward the form to the SSO, The SSO may talk to you (and/or the DSO) about the incident. The SSO will make a decision regarding the concern/incident within 24 hours of receiving the form.

5

The SSO will decide if the concern is allayed and/ or considered a low-level concern. Their decision will be added to the form and passed to HR for secure filing

6

Where the SSO is concerned, they will make a referral to the local Children’s Social Services, Adult Social Care, via MASH, LADO, Police, NSPCC (0808 800 5000) or Childline (0800 1111)

Appendix 6

Senior Safeguarding Officers and Designated Safeguarding Officers, Safeguarding Committee Structure, Prevent Lead and Key Individuals, as at 1 September 2020

Senior Safeguarding Officers:

Director of Examinations

James Stockdale

T: +44 (0)20 7326 8088 / +44 (0)7743 23329

Primary responsibility for Safeguarding within departments: Examinations, Fundraising and Development. CPD, Human Resources, Marketing & Communications.

Director of Education

Dr Michelle Groves

T: +44 (0)20 7326 8028 / +44 (0) 7747 505752

Primary responsibility for Safeguarding within departments: Faculty of Education, Training, Music, RAD Enterprises, Step into Dance, Benesh, Finance, Library and IT; Prevent Duty Lead.

Head of Global Development

Léonie Locke

T: +44 (0)20 7326 8028 / +44 (0) 7747 505752

Primary responsibility for Safeguarding within departments: UK Regions and National (International) offices.

Where SSOs are unavailable due to absence at the same time and DSOs require assistance the Head of HR is available.

Designated Safeguarding Officers (DSO) are normally available as follows:

Department	Name & job title	Telephone number	Working days & hours
Examinations	Lillian Doleman: Panel of Examiners Officer	+44 (0)20 7326 8058	Monday to Friday 10.00am – 6.00pm
Facilities	Mohammad Zaheer: Facilities Manager	+44 (0)20 7326 8048	Friday 10.00am – 5.00pm Saturday 8.00am – 7.00pm Sunday 8.00am – 7.00pm Monday 11.00am – 5.00pm
Facilities	Sania Akram: Facilities Officer	+44 (0)20 7326 8048	Monday to Friday 8.00am – 4.00pm
Facilities	Andrew Thomas: Security and Information Officer	+44 (0)20 7326 8048	Monday to Friday 4.00pm – 10.00pm
Facilities	Suzie Latil: Receptionist	+44 (0)20 7326 8048	Saturday 9.00am – 6.30pm

Faculty of Education	Gemma Mills: Lecturer	+44 (0)20 7326 8921	Monday, Weds and Thurs 10.00 – 6.00
Library	Rebecca Blackburn: Library and Research Services Manager	+44 (0)20 7326 8010	Monday to Friday 10.00am – 6.00pm
Marketing Communications and Membership	Melanie Murphy: Director of Marketing Communications and Membership	+44 (0)20 7326 8003	Monday to Friday 10.00am – 6.00pm
Artistic / Music	Martin Cleave: Pianist and Music Manager	+44 (0)20 7326 8053	Monday to Friday 10.00am – 6.00pm
Development and Fundraising	Esther McLaughlin: Director of Development and Fundraising	+44 (0)20 7326 8957	Monday to Friday 10.00am – 6.00pm
Step into Dance	Vacant		
Royal Academy of Dance Enterprises Ltd	Floresa Barillo: Retail Manager	+44 (0)20 326 8092 +44 (0)20 326 8914 +44 (0)20 326 8080	Monday to Friday 10.00am – 6.00pm
Training / Dance School	Gia Gray: Dance School Manager	+44 (0)20 7326 8043	Monday to Thursday 8.15am to 4.15pm and Fridays offsite 8.30am – 4pm
Training	Louisa Dalton: Lead Student Activities Officer	+44 (0)20 7326 8036	Monday 9am – 11.30am offsite Tuesday to Friday 9.00am – 6.00pm
Training	Lauren Handley: Dance Studies Officer	+44 (0)20 7326 8995	Term time Tuesday – Friday 10.00am – 6.00pm Saturday 8.00am – 4.00pm Non-term time Monday to Friday 10.00am – 6.00pm
Benesh	Vacant		
UK Regions Scotland (home based)	Jennifer Macfarlane: Regional Manager	+44 (0) 131 445 5455 +44 (0) 7554 457 256	Monday to Thursday 10.00am – 6.00pm
UK Regions (home based)	Joanna Clarke: National Manager	+44 (0) 7879 550470	Monday, Tuesday, Thursday 8.30am to 3.30pm
UK Regions (home based)	Louisa Coleby: Regional Manager	+44 (0) 1386 40935 +44 (0) 7554 457 257	Monday to Friday 8.00am to 4.00pm

Prevent Duty

Prevent Lead:

Director of Education
Dr Michelle Groves
T: +44 (0)20 7326 8028 / +44 (0) 7747 505752

“Key Individuals” under the Prevent Duty:

Chair of Trustees: Guy Perricone

Trustees: Hilary Clark
 Peter Flew
 Imogen Knight

Chief Executive Officer Luke Rittner

Senior Safeguarding Officers, Designated Safeguarding Officers & Safeguarding Committee Structure



Designated Safeguarding Officers:



Appendix 7

Safeguarding and Prevent Training Policy

As part of its commitment to safeguarding children and adults at risk, the RAD has a dedicated Safeguarding Training and Prevent Policy, which also includes Channel. This policy sets out the induction and training arranged by the London HQ. National offices are required to arrange and report on training in a similar way. Table 1 on p.59 summarises the policy.

1. Induction information and awareness

RAD Trustees have ultimate responsibility for safeguarding and Prevent. Upon appointment Trustees are issued a copy of the Safeguarding policy and procedures with special attention drawn to the report procedures and types and definitions of abuse. They are informed of amendments to the Policy as part of the annual Policy approval process. They will also be given regular training (see below). Voluntary Sub-Committee members who are not Trustees are also issued a copy of the Safeguarding policy and procedures on appointment, with special attention drawn to the report procedures and types and definitions of abuse.

All new permanent, fixed term and temporary employees (irrespective of duties) are given an induction by the HR Department within which a copy of the Safeguarding policy and procedures is issued and special attention drawn to the RAD Safeguarding reporting procedures and types and definitions of abuse. Employees will have previously been alerted to the Policy through the Employee Handbook and they are kept informed of any Policy amendments. Employees will also be given Part One of *Keeping Children Safe in Education (2020)* guidance.

Employees of the Faculty of Education will also be given *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*.

All new casual workers, freelance staff and volunteers (irrespective of duties) are issued by their line manager (or equivalent) an induction Safeguarding briefing document and a copy of the Safeguarding Policy and Procedures with special attention drawn to the RAD Safeguarding reporting procedures and types and definitions of abuse. These staff will have previously been alerted to the policy through their Terms and Conditions of engagement and they are kept informed of any policy amendments. They will also be issued Part One of *Keeping Children Safe in Education (2020)* guidance.

Casual and freelance staff of the Faculty of Education will also be issued *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*.

All Faculty of Education students and trainees have a programme induction and they are issued a copy of the Safeguarding policy and procedures with special attention drawn to the RAD Safeguarding reporting procedures and types and definitions of abuse. They will also be given Part One of *Keeping Children Safe in Education (2020)* guidance and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*.

2. RAD Code of Behaviour and Good Practice

All RAD staff are briefed by their line manager or equivalent as to the expectations in the RAD Code of Behaviour and Good Practice as part of their induction or before any or before any activities on behalf of the RAD, involving children and/or adults at risk, take place.

3. Safeguarding/Child Protection Training Courses

In addition to induction, employees, casual workers, freelance staff and volunteers, including Trustees and Sub-Committee members, receive training as outlined below:

RAD Trustees and Voluntary Sub-Committee Members must complete an online training course (Level 2) on an annual basis to be able to discharge their duties. They will also be invited to classroom/face-to-face ('live') Level 3 training which they may attend on a voluntary basis instead of the Level 2 course.

The Chief Executive, SSOs, DSOs and members of the Safeguarding Committee are required to attend mandatory comprehensive Level 3 training which will be delivered in a classroom /'live' environment, and provided by an external organisation / trainer with expertise in Safeguarding and Child Protection. These staff are required to complete Level 3 training annually.

Permanent, fixed term employees, casual and freelance workers and volunteers with contracts or engagements of one year or more who hold roles which include responsibility for the regular training, teaching, instructing, caring and/or supervision of children under 18 and / or adults at risk are required to attend mandatory Level 3 training which will be delivered in a classroom environment, repeated annually, and provided by an external organisation / trainer with expertise in Safeguarding and Child Protection.

Newly appointed staff including volunteers who hold roles with responsibility for young people will be required to complete the level 2 online training before commencing work with children under 18 and / or adults at risk.

Casual workers, freelance workers and volunteers on a short contract (less than one day and up to and including approximately two to three weeks per year on ad hoc occasions) who hold roles which include responsibility for the training, teaching, instructing, caring and/or supervision for children under 18 and /or adults at risk are required to complete an online training course (Level 2) in Child Protection before commencing work and separate Prevent and Channel awareness training.

Newly appointed casual and freelance workers and volunteers with this type of ad hoc contract will be required to complete the Level 2 online training before commencing work with children and/or adults at risk.

RAD Examiners will have Safeguarding and Child Protection training and briefing included in Examiner seminars and other training opportunities. They must complete online training course (Level 2) at least once every two years.

Employees and volunteers of any type with no specific responsibilities for safeguarding or who have direct contact with children and adults at risk must complete the online training course (Level 2) in Child Protection which they must complete at least once every two years.

Within the members' area of the RAD website, RAD members are made aware of the Safeguarding policy and procedures. There is also a members' factsheet that directs them to external specialists, individuals or organisations where they can find information on safeguarding best practice.

Faculty of Education students who undertake placements will receive mandatory external formalised certificated training, provided by an external organisation / trainer with expertise in child protection. The training is repeated annually. See below for mandatory Prevent and Channel awareness training for Faculty of Education students who undertake placements.

4. Training for Licensed Chaperones

In order to be issued with a Licence as a Chaperone by the local authority (Wandsworth) under the child performance legislation, among other conditions, staff must complete the NSPCC online training course 'Protecting Children in Entertainment training for Chaperones'. This course must be repeated if a Chaperone's licence has expired for 12 months or more. It is the Chaperone's responsibility to plan ahead for the activities for which they will be acting as a Chaperone, to complete the training and liaise with the HR Department on the other conditions they must meet to obtain or renew their status as a Licensed Chaperone.

5. Prevent and Channel Training

The RAD has identified that as part of our statutory obligations the following staff should have annual mandatory training in "Prevent" and "Channel":

- Prevent Lead
- Prevent 'Key Individuals'
- All employees of the Faculty of Education
- Faculty of Education students who undertake placements
- All members of the Safeguarding Committee
- Senior Safeguarding Officers
- Designated Safeguarding Officers

The staff listed above must obtain a certificate as proof of completion each year. The staff involved will be reminded by the HR Department or the Faculty of Education to complete the training and whom the certificate of completion must be emailed each year.

All other staff are able to access the Prevent and Channel training on a voluntary basis. It is available as follows:

- a) Prevent <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

The training – available free – takes approximately 45 minutes to complete. At the end of the training the system produces a certificate of completion, which can then be saved as a personalised PDF to evidence that training has been completed successfully.

- b) Channel General Awareness Training
<https://www.elearning.prevent.homeoffice.gov.uk/channelawareness>

This module provides information on Channel and your duties and responsibilities in the process. The module takes approximately 25 minutes to complete and a certificate of completion is also available through portal.

- c) There is also a further additional resource which you may find useful as additional reading available at Educate Against the Hate <https://educateagainsthate.com/>

Table I – Safeguarding and Prevent Induction and Training summary

	← INDUCTION, INFORMATION AND TRAINING →						
STAFF CATEGORY ↓	Employee Handbook	Employment Contract or Terms of Engagement	The Safeguarding Policy incl Code of Behaviour and Good Practice	KCSIE* 2020	Channel Duty Guidance	Safeguarding Training	Prevent and Channel Training
RAD Trustees			√	√		Annual Level 2 (Level 3 optional)	
Trustees and “Key Individuals” under ‘Prevent’			√	√	√	Annual Level 2 (Level 3 optional)	Prevent and Channel on-line annually
Voluntary members of Sub-Committees, not Trustees			√				
CEO and “Key Individual” under ‘Prevent’	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
SSO and Prevent Lead	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
SSO and Safeguarding Committee member	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
DSO	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
DSO and Safeguarding Committee member	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
Safeguarding Committee member	√	√	√	√	√	Annual Level 3	Prevent and Channel on-line annually
Staff on contracts or engagements 1 year plus & regular contact w. children/adults at risk	(√)	√	√	√	√	Annual Level 3 (Level 2 before commencing work)	Prevent and Channel on-line annually
Staff on contracts or engagements less than 1 year & regular contact w. children/adults at risk	(√)	√	√	√	√	Level 2 before commencing work	Prevent and Channel on-line annually (optional)
All Employees of FoE	√	√	√	√	√	Annual Level 3 arranged by FoE staff)	Prevent and Channel on-line annually
All other staff	√	√	√	√		Level 2 at least once every two years	
RAD Examiners* (delivered in Examiner seminars and specific training opportunities)			√	√		Level 2 at least once every two years	
FoE Students on placement			√	√	√	Annual Level 3 (arranged by FoE staff)	Prevent and Channel on-line annually
All other FoE Students			√	√	√	Annual Level 3 (arranged by FoE staff)	
External hirers and contractors			Code of Conduct				

Notes on Table I

**KCSIE = Keeping Children Safe in Education 2020, Part One*

FoE = Faculty of Education

RAD Members – information on the RAD Safeguarding Policy and Procedures is made available within the members' area of the RAD website. Safeguarding Training is offered to RAD members by the CPD Department. Prevent and Channel awareness training available free to RAD members through the websites listed on p.58.

Appendix 8

Principles of information sharing

HM Government published non-statutory guidance *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* in March 2018. This guidance, which supersedes guidance published in 2008, 2009 and 2015, is for frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case-by-case basis. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

The guidance includes 'Seven golden rules of information sharing' to support organisations and workers when making decisions about when it is appropriate to share information with others, which are reproduced here:

1. Remember that the Data Protection Act 2018 and related legislation and human rights law are not a barrier to justified information sharing but provide a framework to ensure that personal information about living persons is shared appropriately.
2. Be open and honest with the person (and/or with their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
4. Share with informed consent where appropriate and where possible respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason for doing so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 9

Virtual Safeguarding Policy

[To be published].

Appendix 10

Additional resources

The following publications are useful additional resources. All are available at www.gov.uk/publications

1. *Keeping children safe in education: statutory guidance for schools and colleges* (September 2020)
2. *Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children* (February 2019)
3. *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* (July 2018)
4. *What to do if you're worried a child is being abused: advice for practitioners* (March 2015)
5. *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (2015)
6. *Safeguarding and protecting people for charities and trustees* (Charity Commission, October 2019)

ENDS