

PINK COW
THEATRE

SAFEGUARDING POLICY

REVIEWED:
MAY 2024

DATE OF NEXT REVIEW:
MAY 2025



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INTRODUCTION

Pink Cow is committed to safeguarding children, and adults with care and support needs, taking part in Pink Cow activities. Pink Cow will take all reasonable steps to ensure that through appropriate procedures and training, everyone who participates in Pink Cow activities does so in a safe environment. We recognise that the safety and welfare of each participant is of the upmost importance regardless of age, gender, ability, culture, ethnic origin, colour, religion, social status or sexual identity and that everyone has a right to protection from abuse.

POLICY STATEMENT

This policy details the legal requirements, organisational procedures and best practice as applicable to all staff. This policy applies to all Pink Cow staff, including those who work on a volunteer or freelance basis. Our policy ensures that all our staff and volunteers are carefully selected and vetted and accept responsibility for helping to prevent the abuse of children and vulnerable adults in their care.

As defined in the [Children Act 1989](#), for the purposes of this policy, anyone under the age of 18 should be considered as a child. This policy also applies to adults with care and support needs, who are defined as individuals aged 18 and over and who are acknowledged as requiring additional support due to differing care and support needs; they will be referred to as 'vulnerable adults' herein.

For children's safeguarding, this policy has been informed [Keeping Children Safe in Education, 2022](#); [Working Together to Safeguard Children, 2018](#); along with other guidance provided by the Isle of Wight local authority, the Local Safeguarding Children Partnership (LSCP), the Hampshire, IOW, Portsmouth and Southampton (HIPS) [Policy and Procedure Guidance](#) and NSPCC guidance.

For adult safeguarding, Pink Cow follows guidance issued under the [Care Act, 2014](#), along with best practice and guidance from the local authority, the local safeguarding adults board and the 4LSAB multi-agency safeguarding adults' board.

We have procedures in place to help any child / vulnerable adult who appears to be at risk or who appears to be a victim of abuse. We will offer help and support when a child / vulnerable adult tells us they are affected by these issues. We will work extensively with external agencies such as the NSPCC and the police to ensure as far as possible that children and vulnerable adults are protected.

This policy will be reviewed and updated whenever it is deemed necessary, at a minimum of once per year.

This Safeguarding Policy is to be read alongside our other policies:

- **Health & Safety Policy**
- **Behaviour Policy**
- **Anti-Bullying Policy**
- **Privacy Statement**

These can be found in Appendix 2.

DEFINITIONS

Safeguarding is everyone's responsibility.

OUR COMMITMENT TO SAFEGUARDING

PINK COW SEEKS TO

- Create a safe and welcoming environment, both on and off stage, where participants can have fun and develop their skills and confidence.
- Recognise that safeguarding is the responsibility of everyone, not just those who work directly with children and vulnerable adults.
- Ensure that Pink Cow activities are run to the highest possible safety standards (See our *Health & Safety Policy*).
- Continually review its way of working to incorporate best practice and make available this information to staff.
- Adhere to the relevant guidelines for safeguarding from governing bodies and external agencies.

PINK COW WILL

- Treat all participants with respect and dignity and celebrate their achievements.
- Carefully recruit and select all employees and volunteers in line with safer recruitment processes and provide them with appropriate training and information.
- Respond swiftly and appropriately to all complaints and concerns about poor practice or suspected or actual abuse.

WHAT IS SAFEGUARDING?

CHILDREN'S SAFEGUARDING

No single organisation will have a full picture of a child's needs. Extra-curricular activities play an important role in the lives of young people and as such, the coordinators have a duty to keeping children safe.

Government guidance, *Keeping Children Safe in Education, 2022*, defines safeguarding as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

ADULT SAFEGUARDING

Adult safeguarding is working with vulnerable adults to keep them safe from abuse or neglect. It is an important part of what many public services do and a key responsibility of local authorities and other agencies. Some of these participants may be at an increased risk due to having identified and existing care and support needs. Others may become vulnerable due to a change in circumstances or new information being shared. The *Care Act, 2014*, introduced a legal duty to make enquiries about adult safeguarding concerns under section 42. The safeguarding duties apply to an adult who:

- Has needs for care and support (whether the local authority is meeting any of those needs).
- Is experiencing, or at risk of, abuse or neglect.
- As a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

STAFF ROLES & RESPONSIBILITIES

Safeguarding starts with Pink Cow staff who must be vigilant to aid in the prevention of harm and abuse to children or vulnerable adults in their care.

DESIGNATED SAFEGUARDING LEAD (DSL)

The Designated Safeguarding Lead is responsible for overseeing and ensuring the safety and wellbeing of children and vulnerable adults involved with Pink Cow. They are the point of contact for anyone in Pink Cow who is concerned about a child or vulnerable adult. They lead upon:

POLICY DEVELOPMENT AND REPORTING:

- Reviewing and updating Pink Cow's *Safeguarding Policy* annually or when necessary.
- Contact with Local Authority Social Services if a child / vulnerable adult is at risk of harm.
- Managing complaints about poor practice against staff / volunteers.
- Referring relevant issues of safeguarding to Pink Cow management for consideration.
- Collecting monitoring data on all safeguarding activities across the organisation.
- Ensuring safer recruitment procedure and promoting safeguarding across the organisation.

POLICY IMPLEMENTATION:

- Acting as a 'front-line' point of contact for any persons concerned about the welfare of a child / vulnerable adult.
- Modelling best practice when it comes to safeguarding amongst staff / volunteers / participants.
- Providing guidance to staff concerned about a child protection issue.
- Keeping accurate records of concerns about children and vulnerable adults including actions taken.

POLICY OVERSIGHT:

- Ensuring that policy and procedures are fully implemented and followed by all staff / volunteers.
- Being kept informed of all safeguarding incidents / reports.

Alongside the Designated Safeguarding Lead, there will also be an appointed Deputy Designated Safeguarding Lead who will take charge in all the above safeguarding matters, should the DSL be unavailable, or a matter arises where the DSL is unable to take care of the situation. Contact details for both the DSL and Deputy DSL are available in *Appendix #1 – Contact Details*.

PINK COW STAFF / VOLUNTEERS

All staff and volunteers working with Pink Cow have a responsibility to safeguard children and vulnerable adults from harm, including:

- Being vigilant of signs that may indicate a child / vulnerable adult is experiencing or is at risk of harm.
- Report any disclosures or concerns, as soon as possible, to the Designated Safeguarding Lead.
- Not asking leading questions when taking a disclosure from a child / vulnerable adult.
- Following the code of conduct laid out in Pink Cow's *Behaviour Policy*.

RECRUITMENT, SELECTION & TRAINING OF STAFF

SAFER RECRUITMENT & SELECTION OF STAFF

Safe recruitment and selection practice is vital in safeguarding and protecting children and vulnerable adults. Pink Cow recognises and takes seriously its responsibility to adopt practice which minimises risk to children and vulnerable adults by ensuring that measures are in place through this practice to deter, reject, or identify people who might abuse children and vulnerable adults or who are unsuitable to work with them. The safety and wellbeing of children and vulnerable adults is always borne in mind throughout the recruitment and selection process.

Pink Cow will ensure that at least one member of any interview panel has completed Level 3 Safeguarding Training. Any appointments with substantial access to children and vulnerable adults will be subject to a reference form (This can be found in Appendix 5).

Pink Cow will ensure that permanent and freelance staff are carefully selected, trained and supervised to provide a safe environment for all children and vulnerable adults, by observing the following principles:

PERMANENT STAFF

- Applicants will be required to complete an application form in which they specify safeguarding training.
- Shortlisted candidates will be interviewed by a panel of at least two staff.
- Selected candidates will be required to provide at least two written references.
- Staff will undergo any safeguarding training required and will require a probationary period.

FREELANCE STAFF

- Persons will meet with Pink Cow management in advance of an employment offer.
- Where relevant, written references will be obtained to confirm their suitability for working with children / vulnerable adults.
- Staff will be monitored by Pink Cow management, who will offer appropriate advice / guidance.

STAFF TRAINING

For positions that hold a substantial degree of personal responsibility and autonomy to act on the welfare concerns of children and vulnerable adults, staff will be given Level 3 Accredited Safeguarding Training.

Staff who regularly work with children will be given Level 2 Accredited Safeguarding Training.

Any staff within our organisation who do not fit into either of the above categories will be given Level 1 Safeguarding Training, no matter of their position.

Pink Cow will keep a record of all Safeguarding Training undertaken by both freelance and permanent staff and will remind them when they are due to attend further training.

DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

The Disclosure and Barring Service (DBS) exists to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children and young adults. A DBS check forms one part of the wider safeguarding process. It helps organisations to determine whether a person is a suitable candidate for a particular role by providing information about their criminal history.

DBS disclosures are required for any staff member (paid or unpaid) who will be working in a Regulated Activity. For most of Pink Cow's work, the only relevant Regulated Activity is unsupervised activities with children: to teach, train, instruct, care for or supervise children, or provide advice / guidance on wellbeing. This work is Regulated Activity if done regularly or intensively, which means being carried out by the same person frequently (once a week or more often OR on 4 or more days in a 30-day period). A person who manages or supervises a regulated activity is also counted as undertaking a Regulated Activity. If the person is providing occasional or temporary services, they are not in a Regulated Activity.

CHECK LEVELS

Before an organisation considers asking a person to apply for a criminal record check through DBS, they are legally responsible for ensuring that they are entitled to apply for the job role. There are currently three levels of check an organisation can request on an individual:

STANDARD CHECKS

To be eligible for a Standard DBS check, the position must be specified in the Exceptions Order to the [Rehabilitation of Offenders Act 1974](#).

Standard DBS checks reveal information from the Police National Computer (PNC) relating to:

- Spent Convictions
- Unspent Convictions
- Cautions
- Reprimands
- Final Warnings

ENHANCED CHECKS

To be eligible for an Enhanced DBS check, the position must be specified in the Exceptions Order to the *Rehabilitation of Offenders Act 1974* and regulations made under the [Police Act 1997](#), which includes work with children.

Enhanced DBS checks reveal all the same information as Standard checks but also check against information held by local police force (e.g. Relevant ongoing investigations or allegations).

ENHANCED CHECKS (WITH BARRED LIST)

To be eligible for an Enhanced DBS check, the position must be specified in the Exceptions Order to the *Rehabilitation of Offenders Act 1974*; regulations made under the *Police Act 1997*, which includes work with children; and fall within the DBS definition of 'Regulated Activity.'

Enhanced DBS checks with Barred List reveal all the same information as Enhanced checks but also check against lists of people prohibited from working with children and vulnerable adults. These are known as 'barred lists.'

REGULATED ACTIVITY

Regulated Activity is a work a person who appears on the DBS Barred Lists is prohibited from doing. This includes work that involves close and unsupervised contact with vulnerable groups including children and vulnerable adults.

The DBS has recently reduced the scope of Regulated Activity, so some roles that previously needed a barred list check no longer do so. However, those posts taken out of Regulated Activity remain eligible for Enhanced Checks. In reducing the scope, there is now a greater role for organisations in deciding whether a person is a suitable candidate for a particular role. To do this effectively, they must also use other safeguarding measures rather than rely on legal provisions alone.

Activities that place a member of staff in Regulated Activity with children are:

- Unsupervised activities: teach, train, care for or supervise children, or provide advice / guidance on wellbeing, or drive a vehicle only for children.
- Work for a limited range of establishments (specified places), with opportunity for contact: schools, children's homes, childcare premises, etc. Not work supervised by volunteers.
- Relevant personal care (e.g. washing or dressing) or healthcare by or supervised by a professional, even if done once.
- Registered childminding and foster carers.

Work under the first two points is Regulated Activity only if done regularly. 'Regularly' means being carried out by the same person frequently (once a week or more often OR on 4 or more days in a 30-day period or in some cases overnight).

Activity under the last two points does not have a frequency restriction and is Regulated Activity even if performed only once.

Broadly speaking, the new definition of Regulated Activity relating to children no longer, includes certain activities done on an irregular or ad-hoc basis or some activities which are properly supervised by someone who themselves is in Regulated Activity.

CHECKS CARRIED OUT BY PINK COW

Pink Cow, as per its legal duty, will carry out the relevant type of DBS check on anyone becoming a regular staff member or volunteer to ensure the safety and wellbeing of any children and vulnerable adults in its care.

Infrequent volunteers who do not perform Regulated Activities or only perform certain Regulated Activities less than once a week or less than 4 days in a 30-day period, may not be DBS checked but will be under frequent supervision by other Pink Cow DBS checked staff members and attempts will be made to not put them into situations where they are alone with a child or vulnerable adult where possible.

IDENTIFYING & RESPONDING TO SAFEGUARDING CONCERNS

SAFEGUARDING DUTIES

Any children or vulnerable adults who may be at risk of abuse or harm are protected by the laws and guidance associated with safeguarding.

Incidents are uncommon, but Pink Cow is aware that an incident could happen involving any participant. Staff are therefore required to be mindful that any child or vulnerable adult must be safeguarded whether this is during Pink Cow activities, at home, in school, in the workplace or in any other setting.

Every person, be that staff member, volunteer or contractor, is expected to demonstrate professional curiosity when they have a concern. No matter how low level or isolated the initial concern may seem, staff should seek to explore the matter further using the processes set out in this policy and implementing their own knowledge and professional judgement gained through safeguarding training. Staff also have a legal duty to report to the Designated Safeguarding Lead (DSL) if they have a cause for concern and believe that an individual, for whatever reason, has:

- Harmed / is harming a child or vulnerable adult.
- Caused a child or vulnerable adult to be harmed.
- Put a child or young adult at risk of harm.
- Attempted to harm a child or vulnerable adult.
- Incited another person to harm a child or vulnerable adult.
- Or is a victim of harm.
- Or is at risk of radicalisation.

The procedures in this policy must be followed whenever an allegation of abuse is made or where there is a suspicion that abuse may be taking place. Think family, e.g. what is going on at home / who else is in that home / has there been a change in the people in the participant's life? A participant may be reporting / talking about their home life in a way that gives rise for concern. Always seek advice from the Designated Safeguarding Lead (DSL) if you are in any way worried or concerned about information that a participant has shared, or changes in behaviour you may have observed.

Remember, always seek advice, this is called contextualised safeguarding.

To support safeguarding, it may on occasion, be necessary to refer to other policies and procedures. In all cases, safeguarding will take precedent over other policy and procedure areas.

TYPES OF HARM

All staff and volunteers should be aware of indicators of abuse and neglect, understanding that children and vulnerable adults can be at risk of harm inside and outside of Pink Cow, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children or vulnerable adults who may need help or protection.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition of one label alone. In most cases, multiple issues will overlap with one another, and it is important to consider whether children or vulnerable adults are at risk of abuse or exploitation in situations outside their families.

All staff and volunteers should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children and vulnerable adults are at risk of abuse and other risks online as well as face-to-face. In many cases, abuse and other risks will take place concurrently, both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing and misogynistic / misandrist messages; any other form of malicious behaviour classed as bullying (See our *Anti Bullying Policy*); the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography to those who do not receive such content.

Harm can take many forms, but it is categorised under the following themes:

- Physical abuse
- Sexual abuse, harassment – ‘Harmful Sexual Behaviour’
- Emotional / psychological abuse
- Peer-on-peer (child-on-child) abuse
- Neglect or acts of omission
- Financial and material abuse
- Domestic abuse
- Self-neglect
- Organisation abuse
- Modern slavery
- Fabricated or induced illness
- Hate crime
- Child sexual exploitation and online grooming
- Positions of trust offences
- Child Criminal Exploitation – including County Lines and local drug networks
- People can also be vulnerable to radicalisation and extremism

See *Appendix 3 – Definitions & Signs of Abuse* for more information.

DEALING WITH DISCLOSURE OF ABUSE & PROCEDURE FOR REPORTING CONCERNS

Any individual who discloses an allegation of abuse or neglect should always be treated with respect and with consideration for their wellbeing at each stage of the process.

It is important that when any member of staff deals with an allegation / disclosure they must reassure the participant that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A participant should never be given the impression that they are creating a problem by raising a concern or reporting any type of abuse or be made in any way to feel ashamed. Abuse that occurs online or outside of Pink Cow should not be downplayed and should be treated equally as seriously.

STEP ONE – MANAGE THE INITIAL DISCLOSURE

If a child or vulnerable adult says or indicates that they are being abused, or information is obtained which gives concern that a child or vulnerable adult is being abused, you should follow this guidance:

RECEIVE:

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and react calmly so as not to frighten the child / vulnerable adult.
- Make a note of what has been said as soon as possible.

REASSURE:

- Reassure the child / vulnerable adult that they have done the right thing by telling you.
- Tell the child / vulnerable adult that they are not to blame.
- Do not judge or criticise.
- It is important that you do not promise to keep it a secret as your professional responsibilities may require you to report the matter. If you make this promise to a child / vulnerable adult and then break it, you confirm to them, yet again, that adults are not to be trusted.

REACT:

- Take what the child / vulnerable adult says seriously, recognising the difficulties inherent in interpreting what is said by a child / vulnerable adult who has a speech disability and / or differences in language.
- If the person making the disclosure is the person being abused, questions should be kept to the minimum necessary to understand what is being alleged.
- Do not ask leading questions (e.g. “What did they do next?” (This assumes they did!), or “Did they touch your private parts?” Such questions may invalidate your evidence and that of the child / vulnerable adult in any later prosecution in court.
- Instead, use the TED principle – Tell Me / Explain / Describe – these are not leading questions but act as a safe prompt.
- If that doesn’t work, use closed, specific style questions that start with a W or H (e.g. “Who?” “What?” “How?”)
- Demonstrate professional curiosity (e.g. Think family. Are there other siblings, children or adults, with care and support needs in the same environment?)

STEP TWO – ENSURE A RECORD IS MADE AS SOON AS POSSIBLE

Information sharing is essential for effective safeguarding and promoting the welfare of children and vulnerable adults. It is a key factor identified in many child safeguarding practice reviews (SPRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and vulnerable adults safe.

A full record of any disclosure shall be made as soon as possible of the nature of the disclosure and any other relevant information. This record may be noted down for the DSL to complete a *Safeguarding Referral Form* later, or on a *Safeguarding Referral Form* to be given to the DSL to finish. You can find a copy of a *Safeguarding Referral Form* in Appendix 4. It is important that you record the account and any questions exactly as it was discussed:

RECORD:

- Date, time and location.
- Name of the person sharing the information and, where different, the name of the person who has allegedly been abused.
- Your name and the names of others present.
- Context which led to the disclosure being made.
- The place where the alleged abuse happened.
- The nature of the disclosure and alleged abuse.
- A description of any injuries observed, using a body map to pinpoint any physical harm.
- The time and date of the report along with the signature of the person completing the report.
- If the disclosure is made by an adult and is a safeguarding concern, then it is important to record their consent to the referral and their desired outcome from the safeguarding referral.
- If the situation is urgent, staff to contact the police on 999 or 101.

STEP THREE – REFERRING THE CONCERN FOR ACTION

It is not the responsibility of anyone working at Pink Cow to decide whether a child or vulnerable adult is being abused or might be abused. However, there is a responsibility to act on concerns to protect children and vulnerable adults so that appropriate agencies can then make enquiries and take any necessary action to protect the child / young person.

If you become aware of any issues or complaint relating to the welfare or wellbeing of children and vulnerable adults, then you should raise these with the Designated Safeguarding Lead (DSL) as soon as possible, who will work with you to fill out a *Safeguarding Referral Form* if you haven't already as a part of Step Two. All concerns will be considered, and a decision reached as to whether the concern should be referred to Social Services. All *Safeguarding Referral Forms* are securely stored and protected.

REFER:

- Any suspicion, allegation or incident of abuse to the DSL.
- A member of staff may seek additional support from their manager or other manager as appropriate.
- The process will vary as set out overleaf depending on whether the participant is a child or vulnerable adult.

MAKING A REFERRAL

FOR CHILDREN (U18):

- The nominated member of staff following disclosure shall report all allegations and incidents of abuse of those under 18 to the Children's Reception Team (CRT) within 24 hours of disclosure for initial consideration and enquiries using the [Inter Agency Referral Form](#). (This form can be found at the LSCP IOW website).
It may be passed to the Multi Agency Safeguarding Hub (MASH), closed with recommendations or closed with no further action.
- Where there is clear evidence that abuse or harm has occurred, this must be reported to the CRT via a phone call, followed by submission of a completed Inter Agency Referral Form (IARF).
- Where harm or abuse is suspected, this must be reported to the CRT via the submission of a completed IARF.

FOR VULNERABLE ADULTS

- Where the safeguarding concern relates to an adult with care and support needs, the DSL will discuss with the adult and establish with them what outcome(s) they would like to be implemented.
- Concerns should be reported to the adult safeguarding team via a phone call and forwarded up using a safeguarding concern referral form.

LEARNING DIFFICULTIES / DISABILITIES

Some people with learning difficulties and / or disabilities may need different support to other people (e.g. in the way their physical / mental condition might mask possible abuse and their ability to verbalise their concerns).

12 – 16-year-old participants: Where a disclosure is made by a 12 – 16-year-old participant, staff should follow the same procedures as outlined in this policy. If the young person is enrolled at a school, Pink Cow's DSL will liaise with the DSL from that school, ensuring the participant is informed of this process, if appropriate. It should be noted that the participant may not be enrolled at a school and therefore the process for post-16 participants will be followed.

NEXT STEPS FOLLOWING REFERRAL

The DSL should discuss with Local Authority Children's Social Care or Adult's Safeguarding Team what action will be taken to inform the parents / carers / home setting and a note of that conversation should be made and recorded.

Where necessary and appropriate, staff will liaise with the police to protect children and vulnerable adults from harm. When contacting the police, Pink Cow staff will have access to the NPCC guidance, [When to Call The Police](#) to help them understand when they should call the police and what to expect when they do.

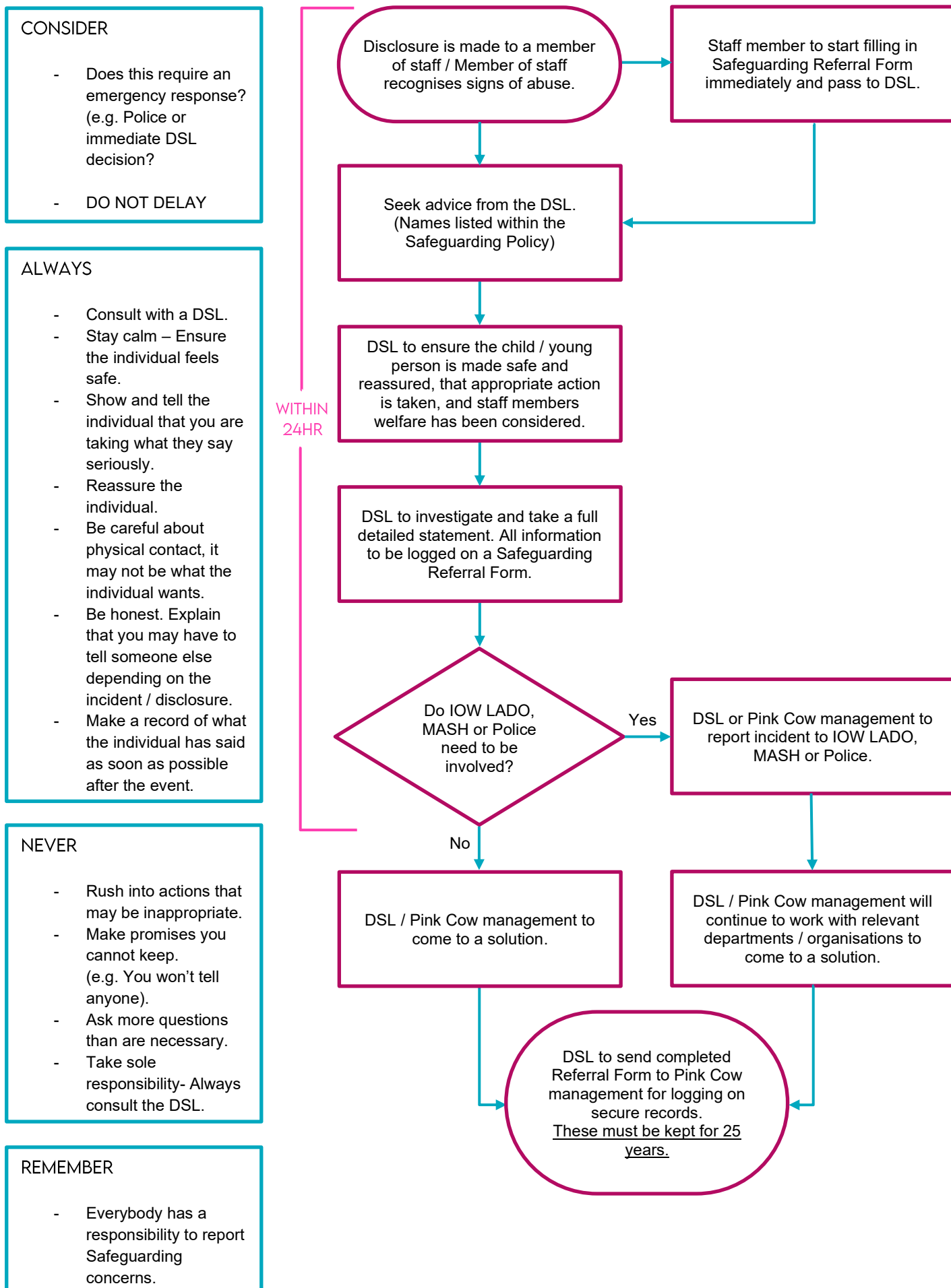
The nominated member of staff for the PREVENT agenda (which is the DSL) should be contacted directly when there are concerns over the risk of radicalisation. The DSL will conduct an initial risk assessment and refer to the Children's Reception Team (CRT) (IOW Social Care) in the case of an under 18 and to the Channel Co-ordinator, the Strategic Manager for Regulatory and Community Safety Services and IOW Council as appropriate for over 18s.

CONFLICT RESOLUTION / ESCALATION POLICY

Following a referral to CRT or Adult Safeguarding, there may be occasion where the referrer has a professional difference of opinion in respect to the outcome of the referral. This applies to Child Protection (CP) and Child in Need (CIN) meetings and processes.

Decisions made by Social Care / Police may be appropriately challenged and escalated using the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding Procedures Manual - [Escalation Policy for the Resolution of Professional Disagreement](#).

REPORTING PROCEDURES FLOWCHART



ALLEGATIONS OF MISCONDUCT OR ABUSE BY STAFF

PROCEDURE FOR REPORTING MISCONDUCT OR ABUSE BY STAFF

In the event of allegations being made against an employee (staff or voluntary), Pink Cow has a dual responsibility in respect of both the child / vulnerable adult and the employee.

In the first instance, the DSL should immediately discuss the allegation with the Local Authority Designated Officer (LADO). The purpose of this initial discussion is to consider the nature, content and context of the allegation and agree a course of action.

The LADO will instruct Pink Cow on procedure and what information may be shared with the person who is subject of the allegation. Pink Cow and LADO will decide, in consultation with any other relevant agencies, what may be shared in situations that may possibly lead to a criminal investigation.

Subject to advice from the LADO, and to any consequent restrictions on the information that can be shared, Pink Cow will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken regarding the individual facing the allegation or concern. The decision and a justification should be recorded, and agreement reached on what information should be relayed in writing to the individual concerned and by whom. The DSL will maintain records of factors which influenced their decisions and associated paperwork and correspondence.

Parents of carers of a child or vulnerable adult should be told about the allegation as soon as possible, if they do not already know of it (subject to discussion with the relevant authority). They should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including whether the matter had led to action being taken under Pink Cow's internal policies and procedure.

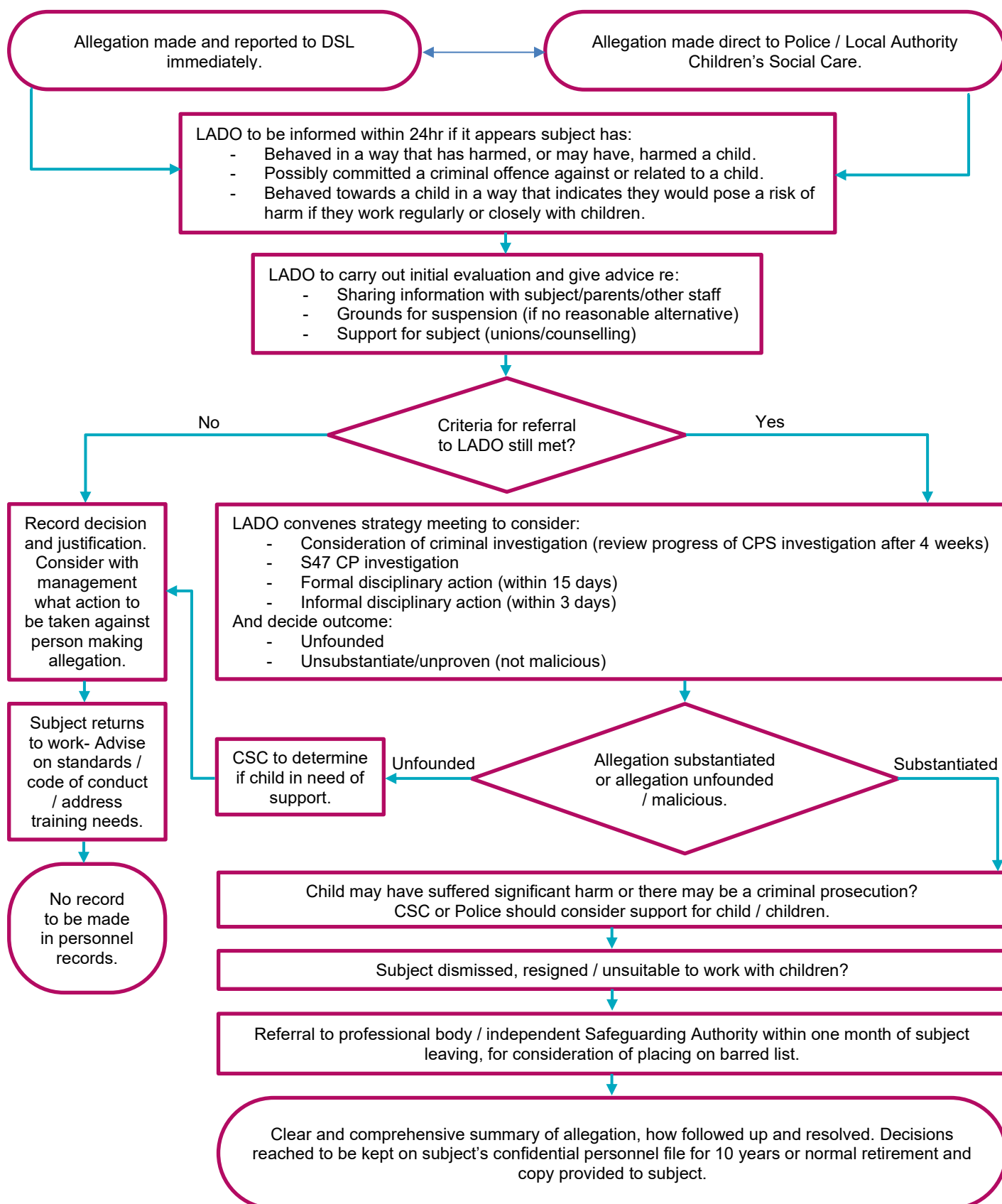
If the DSL is the subject of the allegation or complain, the Deputy DSL will take charge in leading the above procedures. The matter will also be directly reported to Pink Cow management.

In all instances, Pink Cow will seek to ensure that any staff member is treated fairly and honestly and that they are supported to understand the concerns expressed and processes involved. They will be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.

The flowchart overleaf demonstrates the typical procedure for dealing with the reporting of allegations of misconduct or abuse by staff.

Please read our *Behaviour Policy* for more information regarding appropriate and inappropriate behaviour for participants and staff.

REPORTING FLOWCHART FOR ALLEGATIONS MADE AGAINST STAFF



REGISTRATION & SUPERVISION

During workshops, rehearsals, performances and any other activities, Pink Cow has a duty of care to supervise all participants present on location.

Upon enrolment, a participant's parent / carer will fill out a form which includes information relating to how the participant will travel to and from sessions and whether they are allowed out of the building during breaks.

During a licensed performance, all Pink Cow staff and chaperones will follow relevant guidelines regarding record keeping and supervision as outlined by the local authority which may differ to methods used during standard workshops and rehearsals. Please see the *Child Performance Licensing* section for more details.

REGISTRATION

At the beginning of each session, a Pink Cow staff member will take a register to determine who is present. This data will be added to our attendance record system and will be held for the duration of the year.

TRAVEL TO AND FROM ACTIVITIES

Pink Cow's participation forms contain information as to how a participant will travel to and from sessions. Pink Cow does not hold any responsibility for a participant until they have entered the building in which the activity is taking place.

- Any parents dropping their children off should ensure that their child enters the building and supervises them until they are met by a Pink Cow staff member.
- Any parents picking their children up are advised to either enter the building or wait by the front door to meet their child, rather than allowing them to walk unsupervised to meet them elsewhere.
- Participants that have permission to make their own way to and from sessions remain the responsibility of their parent / carer until they arrive and are registered by a Pink Cow staff member.

Once a participant has left the premises, they are no longer the responsibility of Pink Cow and become the responsibility of their parent / carer.

In exceptional circumstances, transport may be provided. If so, this will be arranged in advance and parents / carers will be made aware of any arrangements.

BREAKS

Pink Cow's participation forms contain information as to whether a participant is allowed leave during lunch and rest breaks. Once a participant has left the premises, they are no longer the responsibility of Pink Cow and become the responsibility of their parent / carer until they have re-entered.

Pink Cow still has a duty to supervise participants who remain onsite during any breaks.

COMMUNICATION WITH CHILDREN & VULNERABLE ADULTS

The internet is a legitimate and effective way to communicate with a variety of demographics and brings about many benefits in the forms of simplicity, instant communication and ease of access to information. At Pink Cow, relationships between staff and participants are built upon trust and it is always encouraged that anyone should report any form of behaviour that seems inappropriate. (See our *Behaviour Policy* for more information). Given this, and the fact that communication online introduces the ability to retain communication history to see what has been said, Pink Cow does condone the use of technology for staff to communicate with participants.

It should be noted that these means of communication should not be abused or used in any way that goes against the normal safeguarding and code of conduct procedures that apply to communication in person. At any point if staff feel that a conversation is heading in the wrong direction, they should stop responding. Nobody wants to be led into a situation that has the potential to be misinterpreted.

COMMUNICATION VIA TEXT / INSTANT MESSAGING

GROUP CHATS

To aid in the process of communicating information, and sharing details about rehearsals and shows, Pink Cow operates several WhatsApp group chats where everybody involved in a project can converse.

These group chats contain members of staff who are admins of the chats to help prevent bullying and any other form of anti-social or inappropriate behaviour. Each of these chats contains at least two members of staff to help ensure code of conduct is followed when communicating with children or vulnerable adults via these means.

PRIVATE MESSAGING

There are occasions where staff will communicate with participants via text / instant messaging, but it is expected that both them and the participant follow the same codes of conduct that they would when communicating in person.

Any messages sent to participants must be retained for a minimum of one year in the event that any allegations are brought up as a result of messages sent. Participants are also encouraged to keep hold of any message history in case the two records of message history need to be compared.

COMMUNICATION VIA SOCIAL MEDIA

Pink Cow itself has numerous social media accounts that participants and their families are encouraged to interact with to promote shows and raise awareness of the activities we do. Any comments or messages sent from these accounts must be written in a professional manner, as they are a representation of the organisation as a whole, not as an individual member of staff.

We are aware that both staff and participants use a wide range of social media platforms and ask all staff to respect their association with the organisation when posting anything on personal social media accounts as this is available for anyone to see, including participants who may well come across these accounts. Again, set a good example online just as you would in person.

HANDLING MEDIA

MEDIA CONSENT

Parental / guardian consent for photography or video recording of any child is obtained through Participation Forms. Photographs and videos of children and vulnerable adults will be stored in a designated folder that is only accessible by relevant Pink Cow Staff and only shared via official means (More information can be found in our *Privacy Statement*). Data from camera SD cards will be transferred to our secure storage system as soon as it is possible to do so.

Pink Cow will ensure that any professional photographers or videographers contracted by Pink Cow to take photos / videos of children or vulnerable adults have an Enhanced DBS check which is dated within the last three years, inclusive of their period of engagement. They will not be allowed to have unsupervised access to children / vulnerable adults at the event or to arrange photo sessions outside the event.

PUBLISHING MEDIA

When publishing images, video or any other media, it must be ensured that it is appropriate, and that no information is included that might enable someone to contact the child or vulnerable adult.

- It is preferable to not identify participants by full name.
- If the name of an individual must be shared alongside their photo, other information **MUST NOT** be included (e.g. where they live, other hobbies and interests) that would enable someone to contact, befriend or start to 'groom' the child or vulnerable adult.
- Ensure that participants pictured are suitably dressed, to reduce the risk of inappropriate use.

Some activities take place in areas that are open to the public and it is therefore not possible to control all photography, but any concerns about inappropriate or intrusive photography, or about the use of inappropriate images, should be reported to Pink Cow's DSL and treated in the same way as any other child protection concern.

Parents / carers / audience should be prepared to identify themselves if requested and state their purpose for photography or filming.

RESIDENTIAL & OVERNIGHT ACTIVITY

Pink Cow's programme of work includes opportunities for children and vulnerable adults to attend residential activities. In circumstances where Pink Cow provides accommodation, the following considerations will be made:

- Staff members will sleep in separate rooms to participants.
- Where accommodation is shared, children and vulnerable adults will be provided bedroom, bathroom and toilet facilities of the same gender (where appropriate).
- When travelling, appropriate provisions will be made regarding safeguarding, first aid and the completion of registers for all participants and staff each time a new location is visited.

CHILD PERFORMANCE LICENSING

All children who perform on stage or in television, films, commercials or who work as models, have their welfare and safety protected by the following *Children in Entertainment* legislation:

- [The Children \(Performances and Activities\) \(England\) Regulations 2014](#)
- [Child Performance and Activities Licensing Legislation in England](#)
- [Children & Young Persons Act 1963](#)
- [Children & Young Persons Act 2008](#)

For the purposes of *Children in Entertainment*, a child is a person aged from birth up until the end of their compulsory schooling.

The legislation requires licences to be issued by each Local Authority (LA) for children who take part in one of the following categories:

- Broadcast Performances (films, TV, video) which covers performances that will be broadcast.
- Non-Broadcast Performances (theatre, modelling) which covers performance that are not broadcast.

It is the responsibility of Pink Cow to establish contact with the relevant local authority in which a child resides to obtain instructions as to whether a licence is required unless an exemption applies.

The Children (Performances and Activities) (England) Regulations 2014 only applies to actual performances and therefore the following information does not apply to rehearsals or regular workshops. Rehearsals are, however, affected by the regulations if they take place during the currency of a licence (between the first and last performing day). Rehearsals are then subject to the same restrictions and conditions applicable to that licence (i.e. place of performance, performing times and so forth). Rehearsals also count as a performance when calculating the length of a working week (i.e. 5 days broadcast, 6 days theatre/other).

CHILD PERFORMANCE LICENCE EXEMPTIONS

THE FOUR DAY RULE

The 'Four Day Rule' is an exemption that can be considered for use by both professional and amateur companies. This exemption states that a licence is not required for a child if:

- They perform for only four days in any six-month period.
- They do not need time off from school to undertake the performance.
- They do not receive any payment other than expenses.

Pink Cow will use the Four Day Rule where appropriate.

BODY OF PERSONS LICENCE

The Children & Young Persons Act 1963 gives a local authority under Section 37(3)(b), the power to issue a Body of Persons (A group of responsible adults (e.g. youth organisations, amateur dramatics, etc)) to enable them to engage children in non-broadcast and recorded performances without the need to apply for separate licences for each child for each production.

The Body of Persons must provide the Education Authority with the following information in advance:

- Names, addresses and dates of birth of all the children who will be performing.
- Venue and dates of performances.
- Names and addresses of the adults forming the Body of Persons.

Approval can be granted providing:

- The child performers receive no payment other than expenses.
- The performance is for a stage production.
- The performances all take place within the local authority that is granting the Body of Persons licence.
- The child performers are supervised by the adults who form the Body of Persons or licenced chaperones.
- The organisation complies with the regulations on days and permitted hours of performance contained in the *Children (Performance) Regulations 1968* (see section 7 of Good Practice).
- That the Child Employment Team agreed that the rehearsal/performance venue(s) are suitable places for children to perform.
- The organiser has ensured appropriate arrangements are in place to transport child performers to and from the venue and for them to be released into the care of an appropriate person.
- The organiser will not use the children in performances that may be dangerous.
- The organiser can demonstrate that it can meet any health, safety and welfare conditions set by the local authority.
- The Body of Persons ensure that arrangements are made to transport young performers to and from the venue.
- The Body of Persons does not use children in performances that maybe dangerous.

The holders of the licence must ensure that they keep records of each child's performance as required by Section 3 of *The Children (Performances and Activities) (England) Regulations 2014*. Approval can only be granted for children who perform solely for the holder(s) of the Body of Persons Licence.

Although the law does not insist that chaperones are provided for unlicensed children, local authorities prefer that all children be provided with a chaperone as a condition of granting a Body of Persons Licence. The local authority believes this preference is justified as a matter of good practice and to ensure that all children benefit equally from child protection procedures.

Pink Cow will obtain a Body of Persons licence where appropriate and upon the advice of relevant Local Authority Education Welfare Teams.

RECORDS

As required by Section 3 of *The Children (Performances and Activities) (England) Regulations 2014*, the licence holders will keep the following records:

- The licence.
- The chaperone's record for each participant (See Chaperones section below for particulars).
- Where arrangements are made for the education of the child by a private teacher, including the date, duration and subject of each lesson.
- Details of injuries and illnesses at place of performance including injuries that have caused absence.
- Dates of the breaks in performances if required (2-week break if performed 8 consecutive weeks).
- The amount of money earned by the child through taking part in performance including names, addresses and description of who was paid.
- Where the licensing authority grants a licence subject to the condition that money earned by the child must be dealt with in a manner approved by it, the amount of money paid and how it was dealt with.

CHAPERONES

All licenced children need to be chaperoned in law while taking part in a performance. Chaperones act in loco parentis and should exercise the care which a good parent might be reasonably expected to give that child. Regulations require a ratio of 1 chaperone to 12 children.

A chaperone's first priority is always to the child. The chaperone must not take part in any activity that prevents them from proper supervision of the children they are responsible for. A chaperone will have total charge of a child whilst the child is at the theatre / performance location, and is responsible for the child's care and control. At the end of the event, if the child is handed into the care of their parent or guardian who is outside of the stage performance area, the chaperone will no longer have responsibility for the child.

Chaperones are required by law to keep a record for each child, per performance:

- These records must be kept and made available, together with each child's licence, at every place of performance, for inspection by the Local Authority in whose area the performance takes place.
- Upon completion of the production, the daily record sheet(s) should be stored at the Licence Applicant's main company address for a period no less than 6 months after the final performance.

The record for each child should include the:

- Date
- Time of arrival at the place of performance or rehearsal
- Time of departure from the place of performance or rehearsal
- Times of each period where the child took part in a performance or rehearsal
- The time of each rest break
- The time of each meal break
- The times of any night work as authorised by the licensing authority under regulation 28

Licensed Chaperones are approved by the Local Authorities and will be familiar with the law regarding *Children in Entertainment*.

CHILD PERFORMANCE LICENCE REQUIREMENTS

The following table show the regulations of times and hours as required by *The Children (Performances and Activities) (England) Regulations 2014*. All categories of children and young people's entertainment licensing, including both licence exemptions are subject to these times and hours.

CONDITION	REQUIREMENT		
	AGE 0 – 4	AGE 5 – 8	AGE 9+
Performances Per Week	Max. 6 days in a 7-day week <i>Max. 8 consecutive weeks requires a 2-week interval before performing again in ANY production.</i>		
Time Gap Between Performance Days	14 hours must elapse between the end of the previous day's performance and the beginning of the following day's performance.		
Max № of Hours at Place of Performance / Rehearsal	5 hours	8 hours	9.5 hours
Earliest and Latest Permitted Times at place of Performance / Rehearsal	7am – 10pm	7am – 11pm	
Max period of continuous performance or rehearsal	30 minutes	2.5 hours	
Max total hours of performance or rehearsal	2 hours	3 hours	5 hours
Min Intervals for Meals and Rest	Any breaks must be for a minimum of 15 minutes. If at the place of performance or rehearsal for more than 4 hours, breaks must include at least one 45-minute meal break.	If present at the place of performance or rehearsal >4 hours but <8 hours, they must have one meal break of 45 minutes and at least one break of 15 minutes. If present at the place of performance or rehearsal >8 hours, they must have the breaks stated above plus another break of 15 minutes.	
Min. Break Between Performances	1.5 hours		
School Day	N/A	3 hours per day (maximum of 5 hours per day). 15 hours per week, taught only on school days. Minimum of 6 hours in a week if aggregating over 4-week period or less.	
Arrangements for getting home	Applicant shall ensure that suitable arrangements (having regard to the child's age) are made for the child to get home or other destination after the last performance or rehearsal or the conclusion of any activity on any day.		

APPENDICES

APPENDIX 1 – CONTACT DETAILS

ROLE	POSTHOLDER	CONTACT DETAILS
Pink Cow Management Team	Mish Whitmore Harry Spencer	info@pinkcowtheatre.com
Designated Safeguarding Lead (DSL)	Mish Whitmore	safeguarding@pinkcowtheatre.com 07941101339
Deputy Designated Safeguarding Lead (DDSL)	Harry Spencer	safeguarding@pinkcowtheatre.com 07341981674
'Local Area Designated Officer' (LADO) Isle of Wight	Barbara Piddington Mark Blackwell	child.protection@hants.gov.uk 01962 876364

SUPPORT SERVICES	CONTACT DETAILS
'Safeguarding Children Partnership (SCP) Isle of Wight	SCP@iow.gov.uk 01983 814545
Hants Direct Children's Services	0300 300 0117 0300 555 1373 <i>Out of Hours</i>
Isle of Wight Youth Trust Counselling & Listening to the Under 25s	https://www.iowyouthtrust.co.uk info@iowyouthtrust.co.uk 01983 529569
Isle of Wight Council Childrens Services Department	https://www.iwight.com/Council/OtherServices/Children-and-Family-Services/Contact SCP@iow.gov.uk 01983 823434
NSPCC	https://www.nspcc.org.uk/what-can-you-do/report-abuse 0808 800 5000
Childline	https://childline.org.uk 0800 1111
MIND	https://mind.org.uk
Think U Know	https://thinkuknow.co.uk
Frank	https://talktofrank.com
Hope Line – Suicide Prevention	https://www.papyrus-uk.org/papyrus-hopelineuk/ Call: 0800 068 4141 Text: 07786209697

APPENDIX 2 – RELEVANT DOCUMENTS & RESOURCES

INTERNAL POLICIES

DOCUMENT	LINK
Health & Safety Policy	https://pinkcowtheatre.com/media/Pink_Cow_-_Health_Safety_Policy.pdf
Behaviour Policy	https://pinkcowtheatre.com/media/Pink_Cow_-_Behaviour_Policy.pdf
Anti-Bullying Policy	https://pinkcowtheatre.com/media/Pink_Cow_-_Anti-Bullying_Policy.pdf
Privacy Statement	https://pinkcowtheatre.com/media/Pink_Cow_-_GDPR_Privacy_Statement.pdf

LEGISLATION

DOCUMENT	LINK
Children Act 1989	https://www.legislation.gov.uk/ukpga/1989/41/contents
Children Act 2004	https://www.legislation.gov.uk/ukpga/2004/31/contents
Children and Young Persons Act 1963	https://www.legislation.gov.uk/ukpga/1963/37/contents
Children and Young Persons Act 2008	https://www.legislation.gov.uk/ukpga/2008/23/contents
Children and Families Act 2014	https://www.legislation.gov.uk/ukpga/2014/6/contents
The Children and Social Work Act 2017	https://www.legislation.gov.uk/ukpga/2017/16/contents
The Children (Performances and Activities) (England) Regulations 2014	https://www.legislation.gov.uk/uksi/2014/3309/contents
Care Act 2014	https://www.legislation.gov.uk/ukpga/2014/23/contents
Equality Act 2010	https://www.legislation.gov.uk/ukpga/2010/15/contents
Domestic Abuse Act 2021	https://www.legislation.gov.uk/ukpga/2021/17/contents
Rehabilitation of Offenders Act 1974	https://www.legislation.gov.uk/ukpga/1974/53/contents
Police Act 1997	https://www.legislation.gov.uk/ukpga/1997/50/contents
Counter-Terrorism and Security Act 2015	https://www.legislation.gov.uk/ukpga/2015/6/contents

BEST PRACTICES & GUIDANCE

DOCUMENT	LINK
Keeping Children Safe in Education 2022	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf
Working Together to Safeguard Children	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf
HIPS Policy and Procedure Guidance	https://hipsprocedures.org.uk/
Child Performance and Activities Licensing Legislation in England	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/401345/Child_performance_and_activities_licensing_legislation_in_England_-_departmental_advice_-_final.pdf
Inter-Agency Referral Form	https://forms.hants.gov.uk/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-7e6115a7-b0ba-484d-991f-084c1248ac72/AF-Stage-52cf8e73-0daf-47d4-bb55-0fdad856d3e6/definition.json
NPCC – When to Call the Police	https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf
Escalation Policy for the Resolution of Professional Disagreement	https://hipsprocedures.org.uk/skyyty/safeguarding-partnerships-and-organisational-responsibilities/escalation-policy-for-the-resolution-of-professional-disagreement
Forced Marriage Statutory Guidance	https://www.gov.uk/guidance/forced-marriage
PREVENT Duty Guidance	https://www.legislation.gov.uk/ukdsi/2015/9780111133309/pdfs/ukdsiod_9780111133309_en.pdf
Modern slavery: How to identify and support victims - Guidance	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.3.pdf
Homelessness Reduction Bill Policy - Factsheets	https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets
Domestic Abuse Act - Factsheets	https://www.gov.uk/government/publications/domestic-abuse-bill-2020-factsheets
NSPCC – Signs of Domestic Abuse	https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects
Criminal Exploitation of Children and Vulnerable Adults – Home Office County Lines Guidance	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

APPENDIX 3 – DEFINITIONS & SIGNS OF ABUSE

To effectively protect children and young people, staff should be familiar with the key signs and indicators of abuse, which are detailed below:

PHYSICAL ABUSE

Physical abuse is any form of non-accidental injury which results from wilful or neglectful failure to protect a child / vulnerable adult. This 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.

An important indicator of physical abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury. A delay in seeking medical treatment for a child / vulnerable adult when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children and young people with different skin tones or from different racial groups and specialist advice may need to be taken. Patterns of injury or behaviour that are suggestive of physical child abuse include:

- Bruises that are seen away from bony prominences
- Bruises to the face, back, stomach, arms, buttocks, ears and hands
- Multiple bruises in clusters, of uniform shape, or that carry the imprint of an implement
- Black eyes or bruised ears
- Scalds or burns including cigarette burns
- Adult bite marks
- Loss of clumps of hair
- A history of unexplained minor falls or accidental poisonings
- Deterioration of health with no obvious cause

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child / vulnerable adult who has unexplained signs of pain or illness should be seen promptly by a doctor. Behaviour changes can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example wearing long sleeves in hot weather
- Depression; or withdrawn behaviour
- Running away from home

EMOTIONAL ABUSE

Emotional abuse happens where there is a relationship between a carer and a child / vulnerable adult and can manifest in the person's behaviour or physical functioning as well as causing humiliation or isolation. Emotional abuse can be difficult to measure, and often children and vulnerable adults who appear well-cared for may be emotionally abused by being taunted, put down or belittled. Emotional abuse can include threatening a child or trying to coerce them through harassment, verbal abuse or isolation. Emotional abuse can also take the form of children and young people not being allowed to mix/play with other children and young people. The physical signs of emotional abuse may include:

- Failure to thrive or grow
- Sudden speech disorders
- Developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- Neurotic behaviour, e.g., sulking, hair twisting, rocking
- Being unable to play, fear of making mistakes or fear of expressing an opinion
- Fear of parent being approached regarding their behaviour
- Self-harm

SEXUAL ABUSE

Sexual abuse involves the use of a child / vulnerable adult for gratification or sexual arousal for themselves or others. Usually, in cases of sexual abuse it is the behaviour of children / vulnerable adults which may cause you to become concerned, although physical signs can also be present. In all cases children / vulnerable adults who talk about sexual abuse do so because they want it to stop. It is important therefore, that they are listened to and taken seriously. The physical signs of sexual abuse include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease; vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down

The following changes in behaviour may also indicate sexual abuse:

- Sudden or unexplained changes in behaviour (e.g. becoming aggressive or withdrawn)
- Fear of being left with a specific person or group of people
- Sexual knowledge which is beyond their age or developmental level
- Self-harm or mutilation, sometimes leading to suicide attempts
- Suddenly having unexplained sources of money
- Acting in a sexually explicit way towards adults
- Sexual drawings or language

In cases where it is suspected that a young person may be abusing another young person, Pink Cow will follow the guidelines laid out by the [Hampshire, Isle of Wight, Portsmouth and Southampton \(HIPS\) Safeguarding Children Partnership](#) and that contained in [Keeping Children Safe in Education 2022](#).

There are various types of sexual abuse, including:

CHILD SEXUAL EXPLOITATION (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge (e.g. through others sharing videos or images of them on social media). CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).

PEER-ON-PEER SEXUAL ABUSE

Peer-on-peer (now referred to as 'child-on-child' by *KCSiE, 2022*) harmful sexual behaviour and abuse can happen both online and offline and between children of any age. It can also occur between a group sexually assaulting or harassing a single child or group of children. These sexual offences could be deemed a criminal offence as they are covered by the *Sexual Offences Act*.

UPSKIRTING

'UpSkirting' involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence as part of the *Voyeurism (Offences) Act April 2019*.

Staff should be aware that some students are potentially at greater risk of abuse or exploitation. Evidence shows that girls, students with SEND and those that are part of the LGBTQ+ community, are at greater risk of being sexually harassed and abused.

HONOUR-BASED ABUSE

'Honour-Based' Abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

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, so-called honour-based violence 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 marriage
- Want to get out of a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a particular culture

Women and girls are the most common victims of honour-based violence, however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- Domestic abuse
- Threats of violence
- Sexual or psychological abuse
- Forced marriage being held against your will or taken somewhere you don't want to go
- Assault

FORCED MARRIAGE

Forced marriage is a crime in England where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are threatened, coerced or abuse is used, to cause a person to marry. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

If there are concerns that a person (male or female) is in danger of forced marriage, it should be reported to a DSL or who will contact the Forced Marriage Unit (FMU) (020 7008 0151 / fmf@fco.gov.uk) for advice.

Depending upon the advice received, the DSL will then contact the MASH to ask that the matter be investigated further. Further information is available, and the Forced Marriage Unit has published statutory guidance which can be found [here](#).

FEMALE GENITAL MUTILATION (FGM)

FGM is the partial or total removal of the female genitalia for non-medical reasons. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before the onset of puberty. It is also known as female circumcision, cutting or Sunna. Religious, social or cultural reasons are sometimes given for FGM, however, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Signs that FGM is occurring include:

- Difficulties with urination.
- Constant pain.
- Incontinence.
- Frequent vaginal, pelvic or urinary infections.
- Menstrual problems.
- Kidney damage.
- Cysts and abscesses.
- Discomfort when sitting or standing.
- Appearing anxious or depressed.
- Reluctance to undress or undergo medical examinations.
- Unusual absences from school or college.

Whilst all staff should speak to the Designated Safeguarding Lead (or deputy) regarding any concerns about Female Genital Mutilation (FGM), there is a specific legal duty on teachers (lecturers). If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

BREAST IRONING

Breast Ironing usually starts with the first signs of puberty, which can be as young as nine years old. It is practiced in Chad, Guinea, Bissau, Togo and Benin. The resultant health issues caused by Breast Ironing include burns, deformities and psychological trauma similar to Female Genital Mutilation (FGM).

Signs and symptoms include:

- Difficulties in lifting arms, as the breast area will be tender to move and touch.
- Walking or sitting hunched over.
- Unusual behaviour after an absence from school or college including: Anxiety, depression, aggression, withdrawing and complex PTSD.
- Reluctance in undergoing normal medical examinations.
- Talking about pain or discomfort in the chest area.
- Fear of changing for physical activities due to scars showing or bandages being visible.
- Being withdrawn from physical activities.
- Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear.

CRIMINAL ABUSE

There are various types of abuse that involve a child being involved in or enacting criminal activity, including:

SERIOUS VIOLENCE

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

CHILD CRIMINAL EXPLOITATION (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening / committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and / or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, you should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

COUNTY LINES / LOCAL DRUGS NETWORKS

'County Lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of 'deal line.' This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Local Drugs Networks involve community based criminal activity, often based around families and known associates within the local community. Children and vulnerable adults can be drawn into this through family involvement and can lead to anti-social behaviour like shoplifting and theft, as well as harm and threats in the community. It is important to recognise that this often leads to direct involvement in drug dealing on a local level within the community. There is often a subtle level of grooming and abuse because peer exploitation can involve family members and a child's own group of friends to which loyalties can be deeply embedded, and so makes it much harder to break the cycle of abuse and grooming, as they may well have known these people for many years. In addition, young people will be trying to find their way through their teenage years and may be involved because they really want to fit in with their peer group.

PEER-ON-PEER CRIMINAL ABUSE

Peer-on-peer abuse (now referred to as 'child-on-child' abuse by *Keeping Children Safe in Education, 2022*) occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in peer-on-peer abuse is under the age of 18. Peer-on-peer abuse can relate to various forms of abuse, which includes but is not limited to:

- Bullying (including Cyber bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical Abuse such as hitting, kicking, shaking, biting, hair pulling or causing other physical harm (This may include an online element, where threats are made).
- Sexual Violence, such as rape, assault by penetration and sexual assault (This may include an on-line element which facilitates, threatens and /or encourages sexual violence)
- Sexual harassment such as sexual comments, remarks, jokes and on-line sexual harassment, which may be stand alone or part of a pattern of behaviour.
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (this is called sexting and youth produced sexual imagery).

Mate Crimes happen when people are befriended by someone who uses the relationship to exploit or abuse the person (This can take the form of, but is not limited to, financial, bullying or sexual abuse and can be (but not exclusively seen) where a person may have a cognitive difficulty).

Hate Crimes are defined as 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic'.

EXTREMISM & RADICALISATION

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour and peer relationships.
- Secretive behaviour.
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference, including faith, culture, gender, race or sexuality.
- Graffiti, art work or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-Western or anti-British views or expressing white supremacist and far right-wing extremist views.
- Advocating violence towards others.

PREVENT Duty Guidance can be found [here](#).

The [Counter-Terrorism and Security Act, 2015](#) places a duty on institutions to have due regard to the need to prevent people from being drawn into terrorism, this is known as the PREVENT Duty.

Where staff are concerned that young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL.

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse and anti-social behaviour
- The family being asked to leave a property

The *Homelessness Reduction Act 2017* places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The Homeless Reduction Act factsheet and statutory guidance can be found [here](#).

If a member of staff becomes aware that their student is at risk of, or is homeless, then the DSL must be made aware.

Appropriate support and intervention will be offered to homeless families. Referrals will be made for homeless 16 and 17-year-olds, who are living independently through possible exclusion from the family home, based upon the circumstances.

NEGLECT

Neglect results in a child / vulnerable adult suffering significant harm or impairment of development as a result of being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, or medical care.

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 caregivers).
- Ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect can be a very difficult form of abuse to recognise. The physical signs of neglect may include:

- Hunger, sometimes stealing food from others
- Constantly dirty or smelly
- Loss of weight, or being constantly underweight
- Inappropriate dress for the conditions
- Unattended medical issues
- Withdrawal

BULLYING

Bullying is behaviour that hurts someone else such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It's usually repeated over a long period of time and can hurt a child / vulnerable adult both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying.

You can't always see the signs of bullying, and no one sign indicates for certain that a child is being bullied, but you should look out for:

- Belongings getting "lost" or damaged
- Physical injuries such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money (to give to a bully)
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others
- Aggression
- Lowering of confidence or self-esteem

MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Some indications that a person is subject to Modern Slavery include:

- Signs of physical or emotional abuse.
- Rarely allowed to travel alone.
- Appearing to be under the control of someone else.
- Few or no personal belongings.
- Hesitation when speaking with strangers.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern slavery: How to identify and support victims](#) guidance.

ATTENDANCE

Most students attend their lessons on time and in full. When students are absent, in most cases this will be for valid and easily explained reasons. Following a period of student absence, be it for an extended period or recurrent short absences and including where absence has been consistent / high previously, staff need to be curious to the reasons and open to the potential that there could be an underlying risk of harm, such as child criminal exploitation, child sexual exploitation or modern slavery. If staff have a concern regarding a student following a period of absence, this should be discussed with the DSL. If felt appropriate, further discussion will be had with the student and as appropriate their parent / carer. If deemed necessary, a referral may be made to the Children's Reception Team (CRT) and information shared with the police via an Operation Endeavour CPI form.

DOMESTIC ABUSE

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening, violent or abusive behaviour between partners or family members within the victim's domestic circle. Domestic abuse can be psychological, physical, sexual, financial or emotional.

Exposure, by seeing or hearing domestic abuse and or violence can have a long term emotional and psychological negative impact on children and vulnerable adults.

Helpful guidance with respect to signs and symptoms can be found on the [NSPCC website](#).

Some signs include:

- Suddenly becoming aggressive without an obvious cause.
- Displays of anti-social behaviour.
- Withdrawal with signs of depression.
- Not doing well at school for no apparent reason.
- Sleep problems.
- Minor medical complaints with no obvious source.
- Hyper vigilance.
- Increased separation anxiety.
- Easily distracted.
- Changes in play behaviour.

The new [Domestic Abuse Act 2021](#) provides additional protections for victims and for the first time there is the introduction of a national definition and the recognition of the impact of domestic abuse on children.

Operation Encompass is a national project that is in place on the island. This system ensures early notification if the Police are called to an incident of domestic abuse, where the children in the household have been impacted by the incident (even if this does not take place within the home). The child's school is notified of the incident, usually before the start of the next school day and, depending upon the circumstances, the school will appropriately share the information within the organisation and put in place appropriate support, depending on the needs of the student.

MUNCHAUSEN

Munchausen syndrome by proxy is a mental illness and form of child abuse where the parent or carer of a child causes fabricated or induced illness (FII) to make it look as though the child is unwell.

Signs that someone is subject to Munchausen include:

- Parent / carer attempting to persuade healthcare professionals that their child is ill when it is evident that they are perfectly healthy.
- Exaggerating or lying about symptoms.
- Manipulating test results, such as putting sugar in a urine test to suggest a child has diabetes.
- Deliberate inducement of symptoms, such as poisoning a child.
- Child has repeated hospitalisation with strange symptoms.



PINK COW
THEATRE

SAFEGUARDING REFERRAL FORM

Date of Incident / Disclosure:

D D / M M / Y Y Y Y

Time of Incident / Disclosure:

H H : M M

Date of Form Completion:

D D / M M / Y Y Y Y

Time of Form Completion:

H H : M M

Details of person completing the form:

Name:

Position:

Contact No:

Email:

Details of person about whom incident, disclosure, complaint or allegation was made to:

Name:

Position:

Details of the individual involved:

Name:

Age / DOB:

Tick all that apply:

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> Physical Abuse | <input type="checkbox"/> Emotional Abuse | <input type="checkbox"/> Sexual Abuse | <input type="checkbox"/> Bullying |
| <input type="checkbox"/> Domestic Abuse | <input type="checkbox"/> Neglect | <input type="checkbox"/> Behaviour | <input type="checkbox"/> Child Safety |
| <input type="checkbox"/> Mental Health | <input type="checkbox"/> Online Safety | <input type="checkbox"/> Substance Abuse | <input type="checkbox"/> Peer Pressure |
| <input type="checkbox"/> Youth Development | <input type="checkbox"/> Staff Misconduct | | |

☐ Other – Please Specify:

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Nature of incident, disclosure, complaint or allegation:

In the event of hospitalisation, individual medical form must be completed to accompany this report.
Include concise amount of what was said by the victim in their own words.
Include description of any injuries sustained.

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Action taken by person who is reporting incident, disclosure, complaint or allegation:

Include date / time of actions taken.

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Y ☐ N ☐ Was the teacher / activity leader / next of kin informed of the accident / incident / near miss?

If yes, insert the following:

Name of teacher / activity leader / next of kin:

Date of Conversation:

D D / M M / Y Y Y Y

Time of Conversation:

H H : M M

Y ☐ N ☐ Does the teacher / activity leader / next of kin have a copy of this form?

Y ☐ N ☐ Were any further actions requested by the teacher / activity leader / next of kin?

If yes, what:

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Action taken by DSL:

Include date / time of actions taken.

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Police Details, if applicable:

Complete details of person handling the case.

Name:

Police Ref No:

Position:

Contact No:

Social Services Details, if applicable:

Complete details of person handling the case.

Name:

Ref No:

Position:

Contact No:

Other organisations case forwarded to, if applicable:

Complete details of person handling the case.

Name:

Organisation:

Position:

Contact No:

Name:

Organisation:

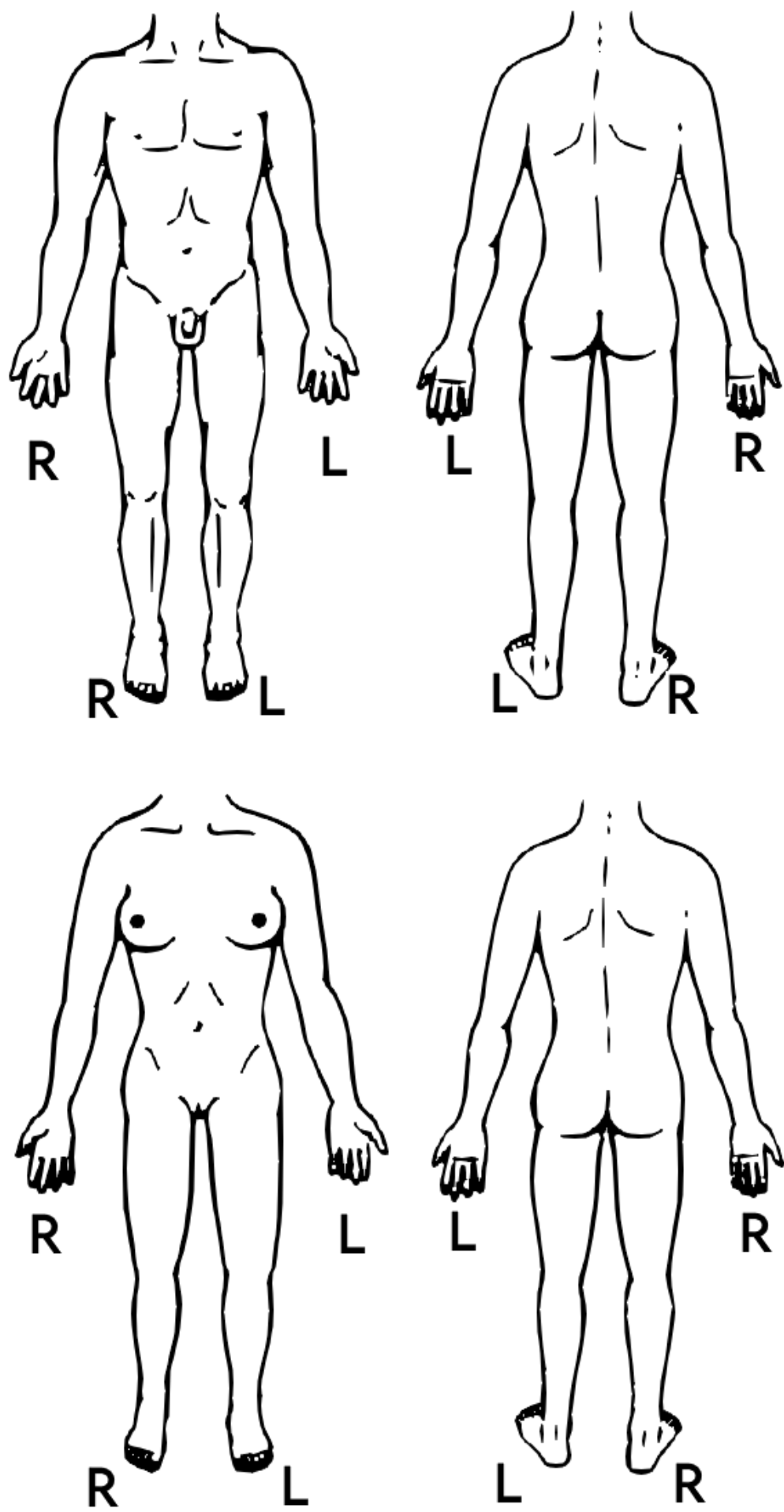
Position:

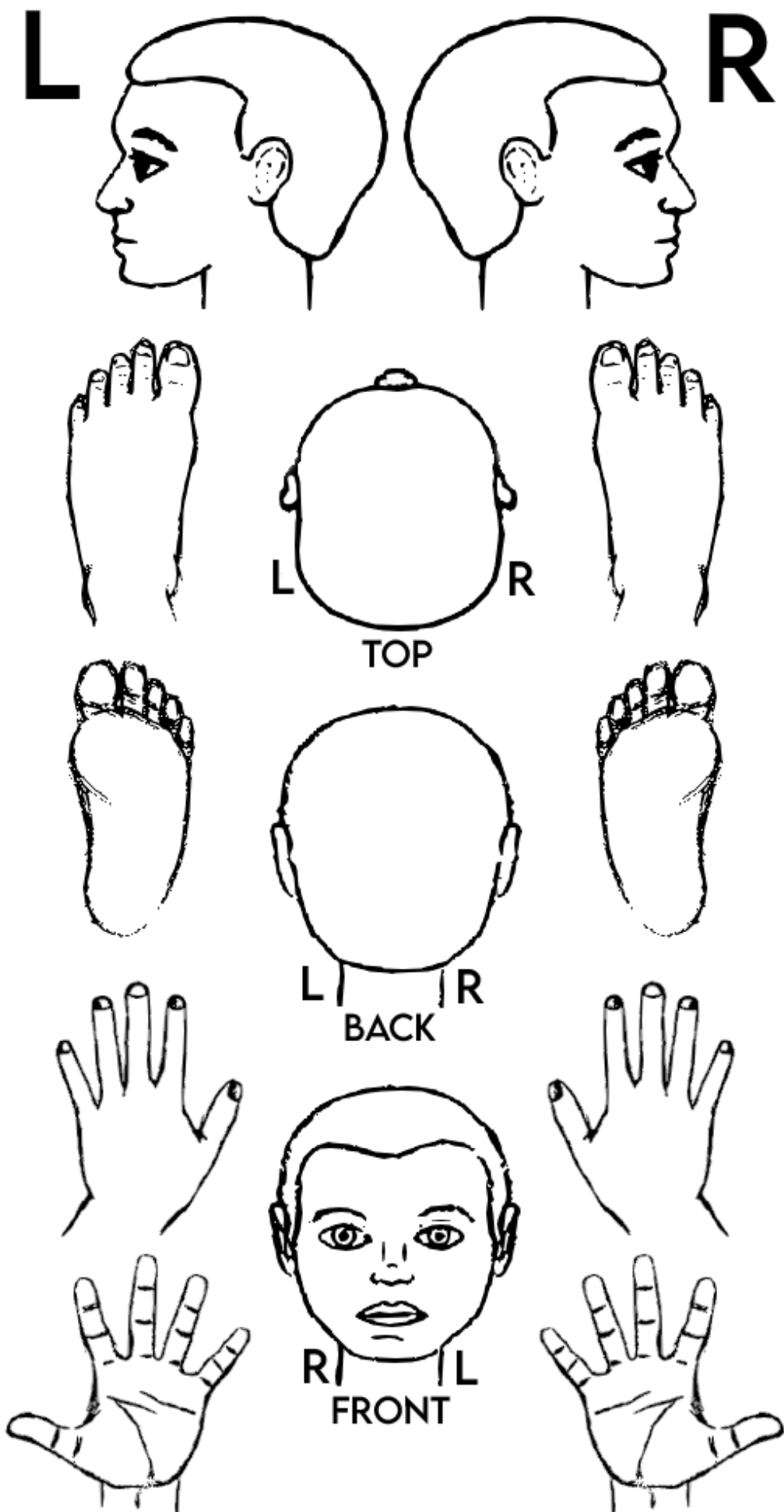
Contact No:

SIGNED:

DATE: DD / MM / YYYY

If applicable, fill in *Body Map Diagram* overleaf.







REFERENCE FORM FOR POSTS WITH ACCESS TO CHILDREN & VULNERABLE ADULTS

APPLICANT DETAILS

Applicant Name:

Post Offered:

Contact No:

Email:

YOUR DETAILS

Name:

Job Title:

Contact No:.....

Email:

SAFEGUARDING CONCERNS

Y ☐ N ☐ This post involves substantial access to children. We are committed to the welfare and protection of children. Are aware of any reason why this person might not be suitable to work with children? If yes, please provide more information:

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Y ☐ N ☐ Are you aware of any previous substantiated allegations, sanctions and/or disciplinary action taken against this person where there were concerns relating to children's safety or protection? If yes, please provide more information:

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Y ☐ N ☐ Are you aware of any current or ongoing allegations, investigations or disciplinary sanctions that remain against this person? This may or may not be related to children's safety and protection. If yes, please provide more information:

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YOUR KNOWLEDGE OF THE CANDIDATE

Employment Dates:

From: DD / MM / YYYY To: DD / MM / YYYY

Capacity in which the applicant was employed or known:

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Main duties:

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Please comment on the candidate’s suitability and overall ability to work with children and vulnerable adults:

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Y ☐ N ☐ Would you re-employ this person? If no, please provide more information.

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Any other information?

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SIGNED: DATE: DD / MM / YYYY