

Safeguarding Policy

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Safeguarding Policy

Safeguarding children is defined in [Working together to safeguard children](#) as:

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

Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

Here at BADA we work directly with students from the age of 16 upwards and across two sites. Our Mid-Summer Conservatory Program at St Mary's University in Twickenham is for 16-18 year old students and our London programs which are for adults only. This integrated safeguarding policy and procedure has combined the principles and processes for children (under 18 years) and adults at risk (aged 18+) on the basis that the principles and many of the processes of best safeguarding practice are similar for both groups.

Policy Statement

The British American Drama Academy (BADA) recognises that all children and vulnerable adults have the right to protected from abuse, maltreatment and harm.

BADA takes its responsibility to protect and safeguard the welfare of the vulnerable very seriously.

BADA has a duty to make appropriate arrangements to safeguard and promote the welfare of children and vulnerable adults.

Government guidance makes it clear that it is a shared responsibility and depends upon effective joint working between agencies and professionals that have different roles and expertise.

Safeguarding is the responsibility of all staff or faculty who, during their employment have direct or indirect contact with children and vulnerable adults, or who have access to information about them, have a responsibility to safeguard and promote the welfare of children and vulnerable adults.

BADA comes into contact with children primarily through the Midsummer Conservatory Program (MCP) which is a three weeklong residential summer program on Shakespeare which takes place once a year. Participation on the program is strictly limited to students aged 16-18. It is a voluntary course of study, run outside of BADA's curriculum and leads to no academic award or accreditation. The types of contact with children will range from regulated and controlled for our administrative staff to intensive contact for the chaperones who will reside in the same residence during these three weeks.

BADA may come into contact with vulnerable adults through any of its programs and therefore, while this policy is primarily focusing on the Midsummer Conservatory Program, it is relevant to all staff and faculty and important that everyone reads and accepts their responsibility to safeguarding children and vulnerable adults across the organisation.

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

Key Definitions

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

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

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

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

See Appendix A for potential indicators of abuse or neglect

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

Definition of a vulnerable adult - A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect his/herself from harm or from being exploited.

This may include a person who:

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

Responsibilities

BADA recognises that safeguarding is a collective responsibility that all staff and faculty (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the recommended procedures.

BADA expects all staff and faculty (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Additional specific responsibilities

The Managing Director has responsibility to ensure:

- this policy has been put in place and is appropriate for the organisation and its activities in relation to children and vulnerable adults
- there are sufficient resources allocated to enable the policy to be effectively implemented

The Program Support & Student Welfare Officer has responsibility to ensure:

- this policy is accessible to all staff, faculty, students, parents and anyone working with BADA
- this policy is reviewed annually
- this policy is implemented at all times
- the welfare of children and vulnerable adults is promoted across the organisation
- staff have access to appropriate training and resources to support the implementation of this policy
- staff concerns are responded to quickly and appropriately
- BADA is up to date with local arrangements and facilities for safeguarding in Oxfordshire and DBS checks are carried out and up to date for all staff and faculty that work on the MCP program
- Effective links are made and developed with relevant agencies

The Finance Director has responsibility to ensure:

- That an accurate and up to date Single Central Record of all permanent staff and self-employed staff/faculty is maintained

The Designated Safeguarding Lead

- At BADA there are two trained designated safeguarding leads, Donna Harris, the Program Support & Student Welfare Officer (DSL) and Robert Hanwell, Facilities and Compliance Manager (Deputy DSL)

As Designated Leads for BADA, it is their responsibility to:

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

Safe Recruitment of Staff and Students

The scope of this Safeguarding Policy is broad-ranging, and, in practice, it will be implemented via a range of policies and procedures within the organisation. These include BADA's Data Protection Policy, Social Media Policy, Mobile Phone and Camera Policy, Confidentiality Policy, Grievance and Disciplinary Policy, Health and Safety Policy, and Equality and Diversity Policy.

Acceptance of Students

The Dean of BADA auditions all potential students on all our programs in person or via Zoom. If accepted, students studying on the MCP are eligible to enter the country for study as Visitors Visit the UK as a Standard Visitor - GOV.UK (www.gov.uk) and, specifically, under the terms of the following section: You must prove that:

- You've been accepted onto a course provided by an accredited UK institution
- The course is no more than 6 months long (unless it's a distance learning course)

An accredited institution must either have a student sponsor licence or have a valid accreditation and be listed by one of the following:

Accreditation Service for International Colleges

Accreditation UK

- British Accreditation Council
- Education and Training Inspectorate (in Northern Ireland) Estyn (in Wales)
- Education Scotland Independent Schools Inspectorate Office for Standards in Education (Ofsted)

Office for Students Quality Assurance Agency for Higher Education

BADA recognises that if a student on the MCP is a visa national, they would additionally need to seek entry clearance as laid out in UKVI guidance. At registration, the students and their parents receive the MCP Code of Conduct, which they are expected to sign and return before departure, to confirm acceptance of their places, along with flight details for arrival and departure and any medical information. They also receive a Pre-Arrival Information Booklet detailing key information about the course, the accommodation and other expectations and requirements.

Safe Recruitment of Staff

BADA ensures safe recruitment through the following processes:

- Job descriptions for all roles involving contact with children and/or vulnerable adults will contain reference to safeguarding responsibilities and the requirement of Disclosure Barring Service (DBS) checks before a formal offer will be made
- There are person specifications for roles which contain a statement on core competency with regard to child/vulnerable adult protection/ safeguarding
- Shortlisting is based on formal application processes/letter and not solely on provision of CVs and is conducted via a short-listing matrix according to equal opportunity principles
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts
- No formal job offers are made until after checks for suitability are completed (including DBS and 2 references) except for exceptional circumstances and the person has a DBS check they are carrying over from another employer and has provided original evidence of this prior to commencing employment.

Disclosure Checks

BADA recognises ensuring the well-being and safety of children and vulnerable adults is vital and therefore it undertakes to DBS check all contractors and staff who work for the MCP (paid or unpaid) and come into daily contact with our students on this program. As a matter of course, BADA will opt for Enhanced Disclosure for all new contractors and staff on the program.

BADA will:

Arrange applicants interviews far enough in advance of the beginning of the program to ensure a full Enhanced Disclosure check can be obtained before the potential employee or contractor would come into contact with the MCP students.

Make sure that during the interview the applicant is made aware of BADA's intention to obtain a full Enhanced Disclosure check.

Confirm, once the request is made, that the employee or contractor is aware of the information required of them, all possible outcomes of the check and that as best they are able, they are complying with information requests diligently and without reasonable delay. BADA will meet any reasonable indirect costs on the applicant's behalf.

Make the applicant aware of the DBS's Code of Practice and employers' guidance for recipients of Disclosures to ensure they are handled fairly and used properly. Also make the employee or contractor aware that they will also receive a copy of the disclosure.

Recognise that to request DBS checks it must comply with the DBS's Code of Practice.

Only use Disclosure information in the context of the recruitment of ex-offenders. In this way BADA aims to protect applicants from unfair discrimination on the basis of non-relevant past convictions.

Only use any information revealed for the purpose for which it was obtained and commit to destroy this information not more than six months after a recruitment decision has been made.

Comply with the Code of Practice, which means co-operating with requests from the DBS to undertake assurance checks, as well as reporting any suspected malpractice in relation to the Code or misuse of Disclosures.

BADA also recognises the DBS can refuse to issue the results of a DBS check if it suspects that the Code of Practice is not being adhered to.

Ensure each year the DBS certificates are re-checked to ensure they are in date and cover all identified posts working on the MCP program.

Safeguarding Training and Awareness

BADA is committed to ensuring all staff and faculty, (paid or unpaid), receive safeguarding training as part of their induction before working on the MCP Program. The training is designed to ensure that all MCP staff and teachers are competent to carry out their responsibilities for safeguarding, promote the welfare of children, are familiar with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare and know that BADA is an environment where they can feel able to raise concerns and feel supported in their safeguarding role. Their declaration of having received the training is stored securely in the BADA office.

Professional Boundaries

Professional boundaries are what define the limits of a relationship between a staff member and a student. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place. BADA expects staff to always protect the professional integrity of themselves and the organisation by adhering to the following professional boundaries. The following is strictly prohibited throughout the program.

Communication:

Inappropriate comments about a child or vulnerable adult's appearance, including excessive flattering comments.

Inappropriate conversation or enquiries of a sexual nature (e.g. questions about a child or vulnerable adult's sexuality or his/her/their sexual relationship with others).

Disrespectful or discriminatory treatment of, or manner towards, children or vulnerable adults based on their perceived or actual sexual orientation.

- Use of inappropriate pet names
- Vilification or humiliation
- Jokes or innuendo of a sexual nature
- Obscene gestures and language
- Facilitating/permitting access to pornographic material
- Facilitating/permitting access to sexually explicit material that is not part of endorsed curriculum
- Failing to intervene in sexual harassment of children and vulnerable adults
- Correspondence of a personal nature via any medium (e.g. phone, text message, letters, email, internet postings, or platforms such as Zoom or Skype) that is unrelated to the staff member's role

Personal Disclosure

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

Physical Contact

Unwarranted or unwanted touching of a child or vulnerable adult personally or with objects (e.g. pencil or ruler).

Corporal punishment (physical discipline, smacking etc.)

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

Inappropriate use of physical restraint.

Place/Location:

- Inviting/allowing/encouraging children or vulnerable adults to attend the staff member's home
- Allowing children and vulnerable adults access to a staff member's personal internet locations (e.g. social networking sites)
- Being alone with a child or vulnerable adult outside of a staff member's responsibilities
- Entering bedrooms or toilets occupied by children or vulnerable adults when supervision is not required or appropriate
- Transporting a child or vulnerable adult unaccompanied
- Using toilet facilities allocated to children or vulnerable adults
- Undressing using facilities set aside for children or vulnerable adults, or in their presence
*Unless agreed with the Designated Safeguarding Lead and with the consent of the child or vulnerable adult

Targeting Individuals

Giving personal gifts or special favors.

Singling the same children or vulnerable adult out for special duties or responsibilities.

Role

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

Photographing, audio recording or filming children or vulnerable adults via any medium when not authorised by the Academy to do so and without required parental consent. Using personal rather than school equipment for approved activities, unless authorised by the Academy to do so. In addition to the prohibited actions above.

The MCP PROGRAM Under 18's

BADA Staff must also agree to the following restrictions when working on the MCP program:

BADA does not allow paid or unpaid staff to give gifts to or receive gifts from students above the value of £20.00 or that may be seen as bribery. However, gifts may be provided by the organisation as part of a planned activity, for example as competition prizes.

Personal relationships between a member of staff (paid or unpaid) and a student who is currently enrolled on a program are prohibited under all circumstances. This includes relationships through social networking sites such as Facebook and twitter. It is also prohibited to enter into a personal relationship with a person who has been a student on the program over the past 12 months, or under the age of consent.

Use of abusive language is prohibited at all times when working with students on the program and will not be tolerated.

Use of punishment or chastisement outside of BADA's disciplinary policy is prohibited.

Passing on student or staff's personal contact details is prohibited.

Under no circumstances should a member of staff take a student to their family home.

No staff member should buy or sell any items to or from a student.

Accepting responsibility for any valuables on behalf of a student is prohibited as BADA cannot take any responsibility for personal belongings during the program.

Accepting money as a gift/ borrowing money from or lending money to students is prohibited. Professional boundaries when working alone with a child or vulnerable adult:

Make it public

The more visible, public and busy the location the better use the site's authorised IT systems.

Do not use personal email or websites to communicate with students.

Make it authorised

Parents/guardians should be informed/give consent.

Activity must be authorised by the Dean and known to the Designated Safeguarding Lead.

Make it timely

As far as possible, provide support during normal work hours, and do not conduct excessively long sessions.

Professional boundaries for appropriate physical contact

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

Administration of first aid

Supporting children and vulnerable adults who have hurt themselves.

Assisting with the toileting and personal care needs of a disabled child or vulnerable adult (an individual plan for children and vulnerable adults with these needs must have been negotiated with parents.)

Non-intrusive gestures to comfort a child or vulnerable adult who is experiencing grief and loss or distress, such as a hand on the upper arm or upper back.

Non-intrusive touch (e.g. congratulating a child or vulnerable adult by shaking hands or a pat on the upper arm or back). Staff should remember the importance of accompanying such touch with positive and encouraging words.

Seek children and vulnerable adults' permission to touch (keeping in mind that a highly distressed child or vulnerable adult may be incapable of expressing their wishes.)

Avoid being with a child or vulnerable adult in a one-to-one, out of sight situation, and never touch a child or vulnerable adult in such a situation.

Do not presume that physical contact is acceptable to a particular child or vulnerable adult. Even non-intrusive touch may be inappropriate if a child or vulnerable adult indicates he/she does not wish to be touched.

Respect and respond to signs that a child or vulnerable adult is uncomfortable with touch.

Use verbal directions rather than touch (e.g. ask a child or vulnerable adult to move in a particular way, rather than physically place the child or vulnerable adult in the required position.)

Use the above approach for demonstrations in dance, sport, music and drama. Where touch is essential for safety reasons (e.g., with swimming or gymnastic instruction), always tell the child or vulnerable adult that you need to hold him/her in a particular way and seek his/her permission to do so.

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

The following policies also contain guidance on staff and faculty (paid or unpaid) conduct: Staff/Faculty handbook, Data Protection Policy, Social Media Policy, Mobile Phone and Camera Policy, Educational Quality Review Policy and Grievance and Disciplinary Policy.

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

Reporting – what to do if you're concerned about a child or young person.

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

There are 4 key steps to remember:

- Recognise abuse or neglect
- Respond to concerns (and record any information disclosed to you or observed by you)
- Refer concerns on (to Designated Safeguarding Lead or other agency)
- Record any actions taken and the outcomes

You must refer concerns as soon as possible to the Programme Support & Student Welfare Officer or the Facilities & Compliance Manager, Robert Hanwell, who are both trained designated safeguarding leads for BADA.

In the absence of the designated persons, the matter should be brought to the attention of the Dean. All referrals of allegations or suspicions of neglect or abuse to the statutory authorities must be made within 24 hours of disclosure. If it is an emergency, and the designated safeguarding leads cannot be contacted or the concern is regarding one of the safeguarding leads, then Children's Social Care or the police should be contacted at the numbers given below.

CONTACT DETAILS FOR RICHMOND / MCP

Local Authority Designated Officer Julie Fisher 07774 332675 or email LADO@achievingforchildren.org.uk

Single Point of Access on 020 8547 5008 (8.00am to 5.15pm, Monday to Thursday, and 8.00am to 5.00pm on Friday. OUT OF HOURS: 020 8770 5000.

Richmond Police Station: 020 8607 9199 or 101 (unless the child is in immediate danger, in which case call the emergency number 999).

Suspicious should not be discussed with anyone other than those named above but a record of the concern must be kept using BADA's Record of Concern Form (See Appendix B). If you are concerned about a child, it is important that you let the child know what will happen next. It is also best practice to inform the parent/carers that a safeguarding referral is being made providing it does not put the child at any increased risk of harm. It is the right of any individual to make direct referrals to the child protection agencies. We would hope that an individual would use BADA's procedure, however, if you feel that the organisation has not responded appropriately to your concerns, it is open to you to contact the child protection agencies directly.

If you are unsure of whether your concern will require a referral and you do not wish to discuss it with one of the Designated Safeguarding Leads, you should call the LCSS for a no name consultation. If a child has an injury which may be a non-accidental injury, or symptoms of neglect and a referral is to be made, then: The Designated Safeguarding Lead should contact the M.A.S.H. If there has been a deliberate injury or where there are concerns about the child's safety, the child's parents should not be contacted before first consulting with social services. Where emergency medical attention is necessary it should be sought immediately. The Designated Safeguarding Lead should inform the doctor of any suspicion of abuse. If a referral is being made without the parents' knowledge and non-urgent medical treatment is required, Children's Social Care should be informed. Otherwise, speak to the parent/guardian and suggest medical attention be sought for the child.

In the event of allegations of sexual abuse, the Designated Safeguarding Lead will: Contact the Children's Social Care or Police Child Protection Team directly. Under no circumstances should the Designated Safeguarding Lead, or any other member of the organisation, attempt to carry out any investigation into the allegations or suspicions of sexual abuse.

The role of the Designated Safeguarding Lead:

To collect the exact details of the allegations or suspicions and to provide this information to the child protection agencies that will investigate the matter under the Children Act 1989.

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

- Stay calm and listen carefully to what is said
- Remember to let the child or young person talk and not to interrupt them
- Find an appropriate time early in your chat to explain that it is likely you will need to share the information with others but reassure them it will be only to those who need to know
- Do not promise to keep secrets. Limit questions by avoiding leading questions. However, it may be appropriate to ask further questions in order to clarify details rather than jumping to conclusions.

Good questions to focus on are:

- What happened?
- When did it happen?
- Who did it?
- Where were you?

Also remember to use phrasing such as “Tell me”, “Explain to me” and “Describe to me.” Reassure the child that they have done the right thing in telling you and explain what will happen next and who you will share the information with.

Make a note immediately of what the child has said, writing down exactly what the child has said, write down what you said in reply, and what was happening immediately beforehand. Record dates and times of the events and when the record was made.

These should be factual and not opinion driven.

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

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

Once a child has talked about abuse the Designated Safeguarding Lead must consider if it is safe for a child to remain on the program.

On a rare occasion it might be necessary to take immediate action to contact Children’s Social Care and/or the police to discuss putting into effect safety measures for the child to ensure they are able to stay in a safe environment while arrangements for their return home can be arranged.

In the event that the child brings allegations of abuse in the home:

The Designated Safeguarding Lead should contact the Local Authority Designated Officer (LADO), Julie Fisher -- 07774 332675 or email LADO@achievingforchildren.org.uk to seek advice and allow them to make arrangements to ensure the child is not returning to an unsafe place.

BADA acknowledges that as the children are only on the MCP program for three weeks it may not be possible to find a complete resolution to the concerns raised or issues disclosed by the child, however it is committed to following the reporting procedure as an initial step in the resolution process.

BADA recognises that it is not up to any member of the staff or student body to decide whether or not abuse has occurred. This is a task for the professional child protection agencies, following a referral from BADA.

BADA recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.

The process for raising and dealing with internal allegations is as follows:

Any member of staff (paid or unpaid) from BADA is required to report any concerns in the first instance to the Designated Safeguarding Lead, unless the concern is relating to them in which case it should be raised with the Dean.

A written record of the concern should be made using BADA’s Record of Concern Form (See Appendix B) and kept securely in a locked office drawer in the BADA Office.

The Designated Safeguarding Lead should then contact the local authority for advice within 24 hours of receiving the concern.

In Richmond this can be done via the Local Authority Designated Officer (LADO) on 07774 332675 or email LADO@achievingforchildren.org.uk.

The member of staff against whom the allegation or concern has been brought should be informed as soon as possible but only after consultation with the LADO.

No internal disciplinary enquiry should take place before an investigation by the police and local children's services as the results of this investigation may inform the disciplinary process.

The outcome of any investigation must be recorded, and a copy kept on the staff member's personnel file.

Under no circumstances should the accused or their colleagues contact or try to retaliate against those who have raised the concern or those involved in the investigation.

Those managing the concern within BADA are not permitted to discuss the situation with others except in order to cooperate with the police or local authorities. Failure to comply with this will result in disciplinary action.

BADA recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Local Authority Designated Officer and its responsibility to support any staff member who has raised a concern about another member of staff.

BADA will fully support and protect any member of staff who, in good faith, reports their concern that a colleague is, or may be abusing a child. If an allegation is found to be malicious or fraudulent, BADA retains the right to take appropriate disciplinary action against the individual(s) responsible for making the claim.

Monitoring and Management of the Safeguarding Practices

BADA will monitor the following Safeguarding aspects:

- Safe recruitment practices
- Enhanced DBS checks undertaken
- References applied for new staff
- Training – register/record of staff training on child/ vulnerable adult protection
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant annually
- Reviewing the current reporting procedure in place annually

Presence and action of designated Manager responsible for Safeguarding is in post – Program Support & Student Welfare Officer and Facilities & Compliance Manager (Robert Hanwell).

BADA will make students and parents aware of the Safeguarding Policy through the Midsummer Conservatory Welcome Booklet. Copies of all our policies will be kept in the BADA office. This policy will be reviewed by the Program Support & Student Welfare Officer every year and when there are changes in legislation and update as required.

Confidentiality and Information Sharing:

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

The principles of the UK General Data Protection Regulation (UK GDPR) and the [Data Protection Act 2018 \(DPA\)](#), must be adhered to when handling personal information, which is:

- Personal information is obtained and processed fairly and lawfully
- Only disclose in appropriate circumstances
- Accurate, relevant and not held longer than necessary
- Kept securely
- The Act allows for the disclosure of personal information without consent of the subject in certain conditions, including the purposes of the prevention and detection of a crime, for example where there is concern about a child or vulnerable adult's welfare and protection. Remember Data Protection Act 2018 and UK GDPR is not a barrier to sharing information but provides a framework to ensure information is shared appropriately and complies with the legislation

All staff must be aware that they have a professional duty to share information with other agencies to safeguard children. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Leads – Program Support & Student Welfare Officer or Facilities & Compliance Manager.

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

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

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

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

Written reports about safeguarding concerns or allegations must be stored in a locked drawer or cabinet (with restricted access) or held securely electronically. Retention timelines for these records are as follows:

Concerns about a child – Records should be kept for seven years.

Allegations or concerns about a staff member – Records should be kept until the person reaches normal retirement age or for ten years if that is longer.

Additional Safeguarding Practices

Below is a description of BADA's additional practices in ensuring the MCP students' safety and wellbeing whilst the program is taking place. BADA recognises and expects that all involved with the MCP will remain flexible should it come to needing to add elements to this list at short notice.

All students' allergies, medical details and flight details are taken before students arrive. This ensures that we are prepared for any medical condition they may require assistance for and any allergic reactions that may occur.

- All parents are given the details of chaperones and the Program Support & Student Welfare Officer before their students arrive so they can contact them on the day and the students know who to look for
- All students are met at Heathrow airport by BADA Chaperones, who will accompany them to St Mary's using transport arranged by St Mary's.
- Students are escorted to the accommodation of the program by BADA staff, unless a guardian or parent wishes to escort them
- All students are given a welcome booklet that outlines the rules of the program and general wellbeing measures that ensure they adapt to a different environment
- All students are required to hand in their passport for safeguarding for the duration of the program
- All students are required to wear a name badge identifying them as MCP students at all times on site- The badge is without the student's name.
- Chaperones and BADA's Program Support & Student Welfare Officer live on site and take it in turns to be on duty
- There is someone on site that the students and parents have access to 24 hrs a day. The office is manned from 8:30am – 7:30pm. All parents/guardians and students are given direct contact details for all chaperones and the Program Support & Student Welfare Officer in case of an emergency
- All students are also made aware of where the chaperones and Program Support & Student Welfare Officer reside on site so they can visit them at any time if they need to, without entering their room

- All students sign out and into the college
- All students are required to be on site by 10:00pm
- All students are required to be in their own rooms by 11:00pm. This is checked by the chaperones who do a check of all corridors, sign in sheets and knock-on doors to ensure a student is present and safe and not making noise
- On all excursions, students will be accompanied by Chaperones and BADA/Staff, the ratio of staff will be according to number and needs of students
- All faculty and staff are DBS checked with enhanced disclosures
- Students are not permitted outside visitors without written permission from the Program Support & Student Welfare Officer
- Students have most evenings with planned activities that keep them on site, such as movie evenings, quizzes and class preparation
- Parents are kept informed of what students are doing via a newsletter and kept up to date with emails from the chaperones and Dean should anything in the news arise that will concern parents
- If anything arises that effects any student, if they are taken ill etc. parents are informed via email and telephone call (depending on time difference) by the chaperones, Dean or Program Support & Student Welfare Officer
- All illnesses, accidents and near misses are logged in the accident book
- On leaving the program all students are given back their passport and escorted to the transport that goes directly to the airport or they leave with parents or a guardian if arranged.

Appendices

Appendix A – BADA Safeguarding – Supporting Information

Potential Indicators of abuse or neglect

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

Physical Abuse

Physical signs of abuse:

- Injuries which occur to the body in places which are not normally exposed to falls or games
- Most children will collect cuts and bruises in their daily life, particularly on bony parts of their body like elbows, knees and shins. You should be more concerned by bruising which can almost only have been caused non accidentally, is unexplained, or the explanation does not fit the injury, or where treatment isn't being sought. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may be needed

Patterns of bruising that are suggestive of physical child abuse include:

- bruising children or vulnerable adults who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters or of uniform shape, or carrying the imprint of an implement used, hand marks or fingertips
- Unexplained bruising, marks or injuries on any part of the body
- Cigarette burns, bite marks, broken bones, scalds
- Injuries which have not received medical attention
- Repeated urinary infections or unexplained stomach pains

Changes in behavior which may indicate physical abuse:

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

Emotional Abuse

The physical signs of emotional abuse may include:

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

Changes in behavior that may indicate emotional abuse include:

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

Sexual Abuse

The physical signs of sexual abuse may include:

- Sexually transmitted disease
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy
- Changes in behavior that may indicate sexual abuse include:
 - Sudden or unexplained changes in behavior e.g., becoming withdrawn or aggressive
 - Fear of being left with a specific person or group of people
 - Having nightmares
 - Running away from home
 - Sexual knowledge which is beyond his/her age or developmental level • Sexual drawings or language
 - Bedwetting
 - Eating problems such as over-eating or anorexia
 - Self-harm or mutilation, sometimes leading to suicide attempts
 - Saying they have secrets they cannot tell anyone about
 - Substance or drug abuse
 - Having unexplained sources of money
 - Not allowed to have friends (particularly in adolescence)
 - Acting in a sexually explicit way with adults

Neglect

The physical signs of neglect may include:

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

Changes in behavior that can also indicate neglect include:

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

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

Bullying may be defined as deliberately hurtful behavior, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are:

- physical (e.g., hitting, kicking, theft)
- verbal (e.g. racist or homophobic remarks, threats, name calling)
- emotional (e.g. isolating an individual from the activities and social acceptance of their peer group)

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

Appendix B - BADA Safeguarding Concern Report Form.

Date
Time

Name of the Child:	Age of the Child: Date of Birth:
Parent/Guardian's Name and Home Address:	Contact details: Tel: Email:
Staff Member's Name:	Staff Member's Position in the Company:

**I am reporting my own concerns or passing on someone else's concerns.
(Delete as applicable)
Please provide clear factual details of the concern.**

--

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

--

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

--

Have you spoken with the child? Please record below the conversation as accurately and in as much details as possible.

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

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

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

Name of DSL handling this report:	
Signature:	
Job Title:	
Consent	
Date	

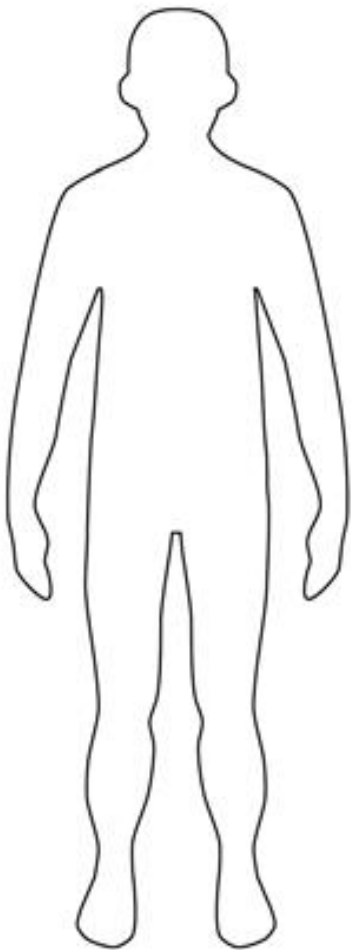
Name:

Date:

Time:

Name of worker:

Observations:



Appendix C BADA Safeguarding - Useful Contacts

Name	Email	Number
Donna Harris Program Support & Student Welfare Officer Designated Safeguarding Lead (BADA)	dharris@bada.org.uk	+44 (0)20 7487 0730 07399 464018
Robert Hanwell Facilities & Compliance Manager Deputy Designated Safeguarding Lead (BADA)	rhanwell@bada.org.uk	+44 (0)20 7487 0730
LADO Richmond.	LADO@achievingforchildren.org.uk	07774 332675
Single Point of Access (SPA)		020 8547 5008.(Monday-Thursday 08.00-17.15 and Friday 08.00-17.00) Out of Hours 020 8770 5000
Richmond Police		<i>020 8607 9199 or 101</i>

Useful links:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<https://www.equalityhumanrights.com/en/human-rights/what-are-human-rights>

<https://www.gov.uk/data-protection>.

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

<https://www.gov.uk/government/publications/approaches-to-preventing-and-tackling-bullying>

Legislation or regulatory guidance that impact on this policy:

- Care Act 2014
- Children Acts 1989 and 2004
- Data Protection Act 2018
- Keeping children safe in education (Sept 2022, KCSIE)
- Children and Young Persons Act
- Working together to Safeguard Children' the Education (Independent School Standards (England) Regulations 2018 updated February 2019
- Prevent Duty Guidance: for England and Wales, July 2015 (updated 1 April 2021)

Policy reviewed: April 2023

Next review date: April 2024