

ATG LONDON LIMITED

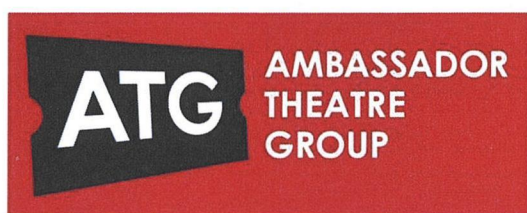
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LONDON BOROUGH OF CAMDEN

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ATTACHMENT TO THE STATEMENT OF ANDREW RAWLINSON

AR 5 – ATG Safeguarding Policy



Ambassador Theatre Group

Safeguarding Policy, Procedures & Code of Conduct

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| This Policy was written in conjunction with advice provided by the National Society for the Prevention of Cruelty to Children (NSPCC). | | | |

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Policy Statement

For Safeguarding Children and Adults at Risk

The Ambassador Theatre Group believes that children and adults at risk should always be safeguarded from harm and recognises its responsibility to safeguard the welfare of all children and adults at risk by a commitment to practice in a way which protects them.

We aim for everyone using our services or participating in our activities to be safe.

In order to do this, we recognise that:

- The welfare of the individual is paramount.
- All children and adults at risk regardless of race, culture, age, sex, gender or gender reassignment, disability, religion, sexual orientation or political persuasion have the right to equal protection from all types of harm or abuse.
- Working in partnership with children and adults at risk in conjunction with their parents, carers and other agencies is essential in promoting their welfare.

The purpose of the policy is:

- To outline how we will protect the children and adults at risk who receive services from the Ambassador Theatre Group, including on and off our premises and the children of adult performers and workers.
- To provide workers with guidance on procedures they should adopt in the event that they suspect a child or adult at risk may be experiencing, or be at risk of, harm.

This policy applies to all staff, including Senior Managers and Board Members, seasonal workers, agency staff, contractors, students and those partaking in work experience/placements or anyone working for or on behalf of the Ambassador Theatre Group in any capacity. It also applies to visiting companies or organisations using our venues including charitable partners, and to third party service providers.

- Our procedures relating to child performers in professional productions will be covered in a further additional policy document in 2023.
- Our policy and specific procedures related to Young Workers and to Work Experience are further covered in additional policy documents, which are specified in 2.4 Related ATG Policies. This Safeguarding policy and procedures applies to all children and young people including young workers alongside those policies.

We are unable to host volunteers in the majority of our teams and venues. In the rare circumstance that volunteers can be engaged, we intend them to be included by the term 'worker' and all procedures here apply equally to them. If you intend to engage a volunteer please contact HR for advice in advance.

We will endeavour to safeguard children and adults at risk by:

- Valuing them, listening to and respecting them.
- Adopting these safeguarding guidelines through procedures and a code of conduct for workers (see section 3).
- Recruiting workers safely ensuring all necessary checks are made.
- Sharing information about safeguarding and good practice with children, parents and workers.

- Sharing information about concerns with agencies who need to know, involving parents, guardians or carers and children and adults at risk where appropriate.
- Ensuring that there are two designated safeguarding leads in each of our venues to support and manage any concerns, disclosures or allegations, with any additional support provided by the Group Access and Designated Safeguarding Lead.
- Providing effective management for workers through appropriate supervision, support and training.
- Formal training will be offered by an external training provider to venue safeguarding leads annually, which they are expected to refresh every two years. They are also expected to attend Safeguarding Forums once every six months. Safeguarding Awareness Train the Trainer courses are offered by the Group Access and Designated Safeguarding Lead at regular intervals throughout the year, which should be used in training with venue teams.

We are committed to reviewing our safeguarding policy and practices at least annually.

This Policy has been written based on the following law and guidance:

Anti-Social Behaviour, Crime and Policing Act 2014
 Care Act 2014
 Children Act 1989 and 2004
 Children and Social Work Act 2017
 Counter Terrorism and Security Act 2015
 Data Protection Act 2018 and the GDPR 2018
 Equality Act 2010
 Female Genital Mutilation Act 2003
 HM Government (2018) Working Together to Safeguard Children (updated January 2022)
 Keeping Children Safe in Education 2021
 What to do if you're worried a child is being abused: 2015
 UN Convention on the Rights of the Child 1991
 Licensing Act 2003
 Modern Slavery Act 2015 (updated July 2018)
 Serious Crime Act 2015
 Sexual Offences Act 2003
 Children and Young People (Scotland) Act 2014
 Getting it Right for Every Child (Scottish Government) 2015
 National Guidance for Child Protection in Scotland (Scottish Government) 2021
 Protection of Vulnerable Groups (Scotland) Act 2007
 Child Protection and Safeguarding Policy – Education Scotland 2021

Section 1: Definitions and Terminology

Definition of Children and Adults at Risk

England & Wales:

A CHILD is any person under the age of 18 years, whether living with their families, in state care, or living independently.

An ADULT AT RISK is a person aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of these needs is unable to protect himself or herself against the abuse or neglect, or the risk of it.

Scotland:

A CHILD is generally defined as someone under the age of 18, however in some child protection contexts a child is someone who is under 16.

A PROTECTED ADULT is an individual aged 16 or over who receives a type of care, support or welfare service.

For the purposes of this document, references to children apply to both English and Scottish definitions, and references to adults at risk also apply to protected adults in Scotland.

Safeguarding Terminology

Child Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. There are four main types of harm: Physical Abuse, Sexual Abuse and Exploitation, Neglect and Emotional Abuse.

Safeguarding and Promoting the Welfare of Children means protecting children from maltreatment; preventing harm to children's health or development; ensuring children grow up with the provision of safe and effective care; and taking action to enable children to have the best outcomes.

Adult Safeguarding is working with adults with care and support needs, people who may be in vulnerable circumstances or at risk of abuse or neglect, in order to take steps to protect them.

Abuse or Neglect Experienced by Adults refers to harm deliberately inflicted on an adult. There are ten categories of abuse that may be experienced by adults: Physical Abuse, Domestic Violence, Sexual Abuse, Emotional or Psychological Abuse, Financial or Material Abuse, Modern Slavery, Discriminatory Abuse, Organisational Abuse, Neglect and Self-Neglect. There are four additional types of harm relevant to safeguarding adults which are not included in the Care Act 2014: Cyber Bullying, Mate Crime, Forced Marriage and Radicalisation.

A Safeguarding Allegation may be made where a person has:

- a. Behaved in a way that has harmed a child/adult at risk, may have harmed a child/adult at risk, or might lead to a child/adult at risk being harmed
- b. Possibly committed or is planning to commit a criminal offence against a child or related to a child/adult at risk
- c. Behaved towards a child/adult at risk in a way that indicates that they would be unsuitable to work with children or adults at risk.

Examples and Possible Indicators of Child Abuse

Remember that these lists are examples and not exhaustive; indicators of abuse of children may apply to adults and vice versa.

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| <p>Physical Abuse <u>Meaning/Examples:</u> Hitting, shaking, throwing, poisoning/ misuse of medications, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms or deliberately causes ill health to a child whom they are looking after.</p> <p><u>Possible indicators of this form of abuse:</u> Frequent injuries; Unexplained or unusual fractures or broken bones; Unexplained bruises, cuts, burns, scalds, bite marks; Pre-mobile babies.</p> | <p>Emotional Abuse <u>Meaning/Examples:</u> The persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on that person's emotional development. It may involve making the individual feel or believe that they are worthless, unloved or inadequate. It may also involve causing the person to feel often frightened or in danger. It may involve exploitation or corruption.</p> <p><u>Possible indicators of this form of abuse:</u> Children who are excessively withdrawn, fearful, or anxious about doing something wrong; Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'; Parents or carers always blaming their problems on their child; Parents or carers who humiliate their child, for example, by namecalling or making negative comparisons.</p> |
| <p>Sexual Exploitation <u>Meaning/Examples:</u> Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children, young people or vulnerable adults may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online. Some children, young people and vulnerable adults are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.</p> <p><u>Possible indicators are children who:</u> Appear with unexplained gifts or new possessions; Associate with other young people involved in exploitation; Have older boyfriends or girlfriends; Suffer from sexually transmitted infections or become pregnant; Suffer from changes in emotional well-being; Misuse drugs and alcohol; Go missing for periods of time or</p> | <p>Sexual Abuse <u>Meaning/Examples:</u> Forcing or enticing a child to take part in sexual activities, whether or not the child or young person is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative or nonpenetrative acts. Sexual abuse also includes noncontact activities such as involving children or young people in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may be same sex or opposite sex, may be by another child or adult.</p> <p><u>Possible indicators are children who:</u> Display knowledge or interest in sexual acts inappropriate to their age; Use sexual language or have sexual knowledge beyond their years; Ask others to behave sexually or play sexual games; Have problems with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.</p> |

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| regularly come home late; Regularly miss school or education. | |
| <p>Neglect</p> <p><u>Meaning/Examples:</u></p> <p>The persistent failure to meet a child's basic physical and or/psychological needs, likely to result in the severe impairment of the child's health or development. It may involve a parent or guardian failing to provide adequate food, shelter and clothing, failure to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment.</p> <p><u>Possible indicators of this form of abuse:</u> Children who are living in a home that is persistently dirty or unsafe; Children who are frequently left hungry or dirty; Children who are left without adequate clothing for the weather conditions; Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence; Children who are often angry, aggressive or selfharm; Children who fail to receive basic health care; Parents who fail to seek medical treatment when their children are ill or are injured; Children who are left alone when they are young or left in the care of unsuitable adults or dangerous adults.</p> | |

Examples of Abuse of Adults at Risk

Remember that these lists are examples and not exhaustive; indicators of abuse of adults may apply to children and vice versa.

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| <p>Physical Abuse</p> <p>Hitting; Slapping; Pushing; Misuse of medication; restraint; inappropriate sanctions.</p> | <p>Domestic Violence</p> <p>Psychological; Physical; Sexual; Financial; Emotional abuse; So called 'honour' based violence; Coercive and controlling behaviour.</p> |
| <p>Sexual Abuse</p> <p>Rape; Indecent exposure; Sexual harassment; Inappropriate looking or touching; Sexual teasing or innuendo; Sexual photography; Subjection to pornography or witnessing sexual acts; Indecent exposure; Sexual assault; Sexual acts to which the adult has not consented or was pressurised into consenting.</p> | <p>Emotional or Psychological Abuse</p> <p>Threats of harm or abandonment or deprivation of contact; Humiliation; Blaming; Controlling; Intimidation; Coercion; Harassment; Verbal abuse; Cyber bullying; Isolation; Withdrawal of services/support.</p> |

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| Financial or material abuse: Theft; Fraud; Internet scamming; Coercion in relation to an adult's financial affairs or arrangements, e.g. regarding wills, property, inheritance or financial transactions; The misuse or misappropriation of property, possessions or benefits. | Modern slavery Slavery; Human trafficking; Forced labour and domestic servitude. Traffickers and slave masters use whatever means they have to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment e.g. passports withheld, imprisonment, withholding wages and/or food, threats of harm to person/family. |
| Discriminatory abuse (including Hate Crime) Harassment, violent actions, slurs or similar treatment because of a person's race, gender and gender identity, age, disability, sexual orientation, religion. | Organisational abuse This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or the care provided in one's own home. It involves one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice. |
| Neglect Ignoring medical, emotional or physical care needs; Failure to provide access to appropriate health, care and support or educational services; Withholding of the necessities of life, such as medication, adequate nutrition and heating. | Self-neglect Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Incidents of abuse may be oneoff or multiple. Repeated instances of poor care may be an indication of more serious problems including organisational abuse. |
| Cyber bullying This is where someone repeatedly bullies someone else though emails or texts or online forums. | Forced marriage Where one or both partners are married without their consent or against their will. Forced marriage is a criminal offence. |
| Mate crime When vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. This can result in serious harm or even murder by people who purported to be their friend. | Radicalisation The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable people to the legitimacy of a cause. It may seek to involve them in committing violent offences. |

Designated Safeguarding Leads

'Safeguarding Leads' are those members of Ambassador Theatre Group staff who have specific responsibility for ensuring effective safeguarding and protection procedures. For the Ambassador Theatre Group these are:

- Group Access and Designated Safeguarding Lead
- Head of UK Creative Learning and Community Partnerships

Venue Safeguarding Leads

In venues it is required that there are two safeguarding leads of a suitable seniority (at least one of whom must be in a venue management role) and who have undertaken a specific Designated Safeguarding Lead training course (at a minimum of Level 3 standard), to act in each other's absence. The role of the safeguarding lead is to:

- Receive, record and communicate information from workers, children, adults at risk or parents/carers who have safeguarding concerns.
- Assess the information properly and carefully, clarifying or obtaining more information about the matter as appropriate and consulting with senior colleagues when necessary.
- Consult initially with a statutory safeguarding agency to seek advice on any doubts or concerns as soon as possible.
- If necessary, to make a formal referral to a statutory safeguarding agency without delay.
- Ensure that all other staff in their venue undertake safeguarding training that is appropriate and relevant to their role.

Section 2: HR-Related Procedures

2.1 Recruitment Procedures

The Ambassador Theatre Group has clearly defined recruitment procedures, which can be found on the company intranet under 'HR – Policies, Processes and Forms'. In order to prevent unsuitable people working with children and adults at risk in the organisation, we will ensure that:

- Job roles are clearly defined and those necessitating an enhanced Disclosure & Barring Service (DBS) check, or registration on the Protection of Vulnerable Groups (PVG) Scheme in Scotland, include this information in the job advert and job description. Please see Section 4 for more on this topic.
- In order to submit an application, all candidates agree to a statement that if successful in being offered the role which they are applying for, they will be required to undertake a DBS check or register on the PVG Scheme prior to starting employment.
- At interview for these job roles, the interviewer is responsible for ensuring that questions pertaining to good practice in Safeguarding are asked.
The interviewer MUST ask the following question (or a question to this same effect, phrased appropriately to the level of role):
 - o What is your knowledge and understanding of safeguarding practice? Do you have any specific examples of where you have encountered this at work?Example additional questions include:
 - o How would you define an appropriate relationship between a staff member and participant?
 - o Could you give examples of what you would consider to be appropriate and inappropriate behaviour between or towards staff and participants?
 - o Can you tell us about actions you have taken to ensure safe practice in your previous work?
 - o How would you go about creating a safe environment for your participants?
 - o Can you give an example of a situation where you put safeguarding theory into practice? How did you feel it went, and what did you learn? Is there anything you'd do differently or take forward next time?
- A copy of our Safeguarding Policy will be sent with the recruitment literature upon job offer for these job roles.
- On offer of employment, the candidate will be asked to sign a declaration stating that there is no reason why they would be considered unsuitable to work with children or adults at risk and will be asked to make a voluntary disclosure of any convictions, cautions, reprimands or final warnings. All such information will be treated in confidence and will not be used against applicants unfairly.
- DBS checks and PVG Membership must be obtained by the Ambassador Theatre Group for all new members of staff in relevant job roles. Whether a check is appropriate and at which level

should be checked by the hiring manager using the government's [online tool](#) prior to requesting any check.

- The person requesting the check or who will handle any DBS/PVG Scheme information must abide by the [DBS Code of Practice](#) or Disclosure Scotland's [Code of Practice](#), depending on whether they are doing so in England, Wales or Scotland.
- The person cannot start work until this check has been received and confirmed as acceptable by the hiring manager. The applicant's offer of employment is conditional on receiving this check.
- A minimum of two referees will be contacted covering at least the past 5 years, who are specifically asked if there is any reason the person would not be suitable to work with children or adults at risk; whilst ATG's recruitment system contacts referees automatically, the responsibility for checking the receipt and suitability of these references lies with the manager recruiting for the role and must be completed before the candidate starts in their role.
- If a candidate discloses information considered to be of relevance to the role, the hiring manager should proceed following our Employment of Ex-Offenders policy, contacting the Venue Director in the first instance and HR for further advice where required.
- DBS checks for staff in any relevant role should be renewed every 2 years (see section 4).
- Freelance staff must supply or obtain their own DBS check or PVG Scheme update or update from the rolling service. Checks must be no more than 2 years old. ATG reserves the right to conduct a new DBS check or PVG Scheme update at its discretion where reusing a previously issued check is not considered appropriate; examples may include when working with particularly vulnerable people or in situations with less oversight from others. Guidance on this can be found on the [gov.uk website](#).
- ATG employees should also renew checks a minimum of every two years, the fees or rolling service fees for which may be reclaimed according to the UK Business Expenses policy.

2.2 Induction and Training

The Ambassador Theatre Group will provide suitable training to all workers in the organisation that is relevant to their role. This will include as a minimum:

- Compulsory comprehensive safeguarding training for all Safeguarding Leads Level 3 training for Designated Safeguarding Leads.
- Code of Conduct Training available on Kallidus for any staff who are likely come into contact with a child or adult at risk through their work with the Ambassador Theatre Group. This includes venue and office staff.
- Safeguarding Awareness Train the Trainer course for agreed venue trainers, to enable them to train staff in their venue and familiarise their teams on the safeguarding procedures including Code Adam.
- Bespoke training for staff including venue and office teams where necessary.

In addition to the above, venue teams are encouraged to partake in local training schemes, such as through their Local Authority, Local Safeguarding Children Partnership or Adult Safeguarding Board.

2.3 Whistle-Blowing and Complaints Procedures

The Ambassador Theatre Group wishes to promote a culture in which staff may express any concerns they may have in relation to safeguarding.

In order to achieve this, staff are encouraged to share any such concerns with a designated person without delay; concerns will be treated seriously and in the strictest confidence. The correct procedures following concerns being raised can be found in section 9, with further guidance in ATG's Whistleblowing Policy.

2.4 Related ATG Policies

Other ATG Policies relating to this Safeguarding Policy include:

Access Policy; Complaints and Grievances Policy and Procedures; Data Protection Policy; Disciplinary Policy and Procedures; Equal Opportunities Policy; Recruitment of Ex-offenders; Risk Management Policy; Whistleblowing Policy; Employment of Young Workers; Recruitment Procedures; Social Networking Policy and Procedures. A new policy on the employment of child performers is to be introduced in 2023.

Section 3: Safeguarding Code of Conduct

The Safeguarding Code of Conduct clarifies the behaviour that is expected of everyone within the Ambassador Theatre Group, and serves to protect children and adults at risk from harm. It will help everyone in the Ambassador Theatre Group to maintain appropriate standards of behaviour, reduce the possibility of false allegations of abuse being made against them and preserve our organisation's reputation.

3.1 The Code

Do:

- Always put the welfare of a child or adult at risk first.
- Challenge unacceptable behaviour and report on all suspicions, concerns, allegations or disclosures of abuse made by a child or adult at risk, including any allegations made against you. Follow all procedures pertaining to safeguarding for this purpose.
- Respect a person's right to personal privacy but never agree to keep any information relating to the harm of a child or adult confidential.
- Encourage all people to feel comfortable and safe enough to point out attitudes or behaviour they do not like.
- Treat everyone with dignity and respect. Remember that all children and adults at risk have a right to equal protection regardless of their race, culture, age, sex, gender or gender reassignment, disability, religion, sexual orientation or political persuasion.
- Be friendly and approachable but professional in your interactions.
- Remember that someone else might misinterpret your actions, no matter how well intentioned.
- Be aware that physical contact with a child or adult at risk may be misinterpreted or even subject to malicious allegations. Avoid such physical contact unless it is pre-planned and a necessary part of the work you are doing or it is an emergency. Record and report any unintended or accidental physical contact with a participant using the incident report system.
- Work openly, avoiding private or unobserved situations and working in isolation. Try to ensure that you are not the only adult present and are at least within sight or hearing of others. Leave the door open if you find yourself in a room alone with a child or adult at risk.
- Allow children and adults at risk to change their clothes with levels of respect and privacy appropriate to their age, gender, culture and circumstances.

- Recognise that caution is required when you are discussing sensitive issues with children or adults at risk.
- Ensure that consent is gained for all photographs or films and how they will be used of children and adults.
- Ensure that any photographs or films of children and adults at risk are taken on devices owned by the Ambassador Theatre Group; if using an organisation hired by the Ambassador Theatre Group, clear guidelines pertaining to privacy and photography standards must be agreed by the responsible member of ATG staff.
- Ensure that any photographs or films of children and adults at risk are only posted on the Ambassador Theatre Group website and social media accounts owned by the Ambassador Theatre Group or agreed partners, such as funded Producers; personal accounts must not be used.
- Ensure that any photographs or films are stored appropriately with access only granted to the appropriate ATG workers and in line with the Ambassador Theatre Group's Privacy Policy (see section 12).
- Give guidance and support to inexperienced helpers, for example, new or casual/sessional assistants or placement students and do not assume they are as familiar with good practice as you are.
- Be mindful of professional boundaries, particularly when a worker on a project is of a similar age to the participants or knows the participants outside of ATG. Regardless of these potential scenarios, a person's status as a worker, 'star' or other association with the theatre or performance may create a power imbalance between the worker and a participant or audience member. The risk of over familiarity may be increased when participants engage with us on a very regular basis or see the same show multiple times, including shows that develop a cult following.
- All workers must declare pre-existing relationships to the venue's Designated Safeguarding Leads.
- Remember you are always a representative of and ambassador for the company.

Do Not:

- Give out your personal contact details (personal phone number, email, home address or social networking links). If a work telephone number is required then a device or work phone number via Teams to your own device can be arranged via the IT department.
- Befriend children or adults at risk that you meet through working with the Ambassador Theatre Group either in person or on social networking sites such as Facebook and Twitter, including accepting friend or follow requests from children or adults at risk met through work with the Ambassador Theatre Group.
- Establish online networking, group or blog forums which are not regulated with controls relating to Ambassador Theatre Group governance and scrutiny.
- Engage in sexually provocative language, use inappropriate or sexually suggestive language or gestures either in person, verbally or via texting/emails.
- Use any form of physical punishment as a means of discipline.
- Conduct a sexual relationship with a child or adult at risk involved in activities with the Ambassador Theatre Group or take part in any form of sexual contact with a child or adult at risk regardless of age of consent.
- Make sarcastic, insensitive, derogatory or discriminatory comments, gestures or jokes to or in front of children or adults at risk.
- Transport children or adults at risk with whom you are working in your own vehicle.
- Discuss your own personal/sexual relationships with children or adults at risk.

- Give or receive any gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a child or adult at risk, or their family.
- Broadcast or share any audio and/or visual material (CDs, DVDs, videos, photos, film, games etc.) during work hours that has inappropriate or obscene content.
- Invite, or allow, a child or adult at risk whom you have met through your work to your home.
- Arrange to meet a child/adult at risk met through work outside of your professional capacity.
- Jump to conclusions about others without checking facts.
- Provide any child or adult at risk with support such as personal care, unless this is a specific part of your role.
- Show favouritism to any individual.
- Rely on your good name or that of the organisation to protect you.
- Believe “it could never happen to me”
 - Take a chance when common sense, policy or practice suggests another more prudent approach.

3.2 What do to if there is a Breach of the Code of Conduct

If anyone is concerned that a worker has breached the Code of Conduct they should:

- Consider if they feel able to raise the matter with the person concerned – ONLY if this is safe and appropriate to do so. This will also depend on the nature of the concern.
- Alert their line manager. If the concern is about their line manager then inform the next most senior line manager.
- The line manager will need to consider the nature of the breach and the most appropriate action to take. This might involve addressing poor practice or using the relevant internal procedures e.g. Disciplinary Procedures.

Advice can always be sought from HR and the Group Access and Designated Safeguarding Lead.

Section 4: Disclosure and Barring Service (DBS) checks – England and Wales, and the Protection of Vulnerable Groups (PVG) Scheme – Scotland

Disclosure and Barring Service (DBS) Checks – England and Wales

There are different types of check which can be requested:

- a basic check shows unspent convictions and conditional cautions
- a standard check shows spent and unspent convictions, cautions, reprimands and final warnings
- an enhanced check shows the same as a standard check plus any information held by local police that’s considered relevant to the role
- an enhanced check with barred lists shows the same as an enhanced check plus whether the applicant is on the list of people barred from doing the role

DBS checks are required for staff whose role does or could regularly require or allow unsupervised work with children or adults at risk or who work in loco parentis (responsible for a child in place of a parent or guardian), and not simply any member of staff who may come into contact with a child or adult at risk.

Examples of relevant roles in the Ambassador Theatre Group's venues are:

- Creative Learning and Community Partnerships core staff (Managers, Producers and Officers)
- Creative Learning Workshop Leaders & Assistants
- Production chaperones (NB. These will also require a chaperone licence from the venue's local authority, in England)
- Managers regularly supervising children without their parents or guardians present, which could include Front of House supervisory roles.
- SIA trained staff and Personal License Holders also undertake such checks but please be aware they may not be required to refresh them as frequently as our two-year limit.

It is worth noting that Venue Safeguarding Leads may not require a DBS Check if their role does not include regular unsupervised contact with children or adults at risk.

To apply for a DBS check, ATG use UK Umbrella Service. Each venue will have a designated Safeguarding Lead or member of the Management Team assigned with a profile to process staff DBS checks. This person must be a recruiting manager for the venue. The login details for this are provided via the Group Access and Designated Safeguarding Lead and cannot be shared with anyone else in the venue, nor may they permit any other person to view the data held on the system. They will keep a register of the staff, the DBS check reference number and the expiry date only.

General eligibility guidance, including the DBS eligibility tool, can be found here:

<https://www.gov.uk/government/collections/dbs-eligibility-guidance>

Eligibility for DBS checks (Standard & Enhanced) is set out in the following legislation:

Standard checks – to be eligible for a standard level DBS certificate, the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

<http://www.legislation.gov.uk/ukxi/1975/1023/schedule/1/made>

Enhanced checks – to be eligible for an enhanced level DBS certificate, the position must be included in both the ROA Exceptions Order and in the Police Act 1997 (Criminal Records) regulations.

Children: <http://www.legislation.gov.uk/cy/ukxi/2013/2669/made>

Adults: <http://legislation.data.gov.uk/ukxi/2013/1194/made/data.htm?wrap=true>

Enhanced checks with children's and/or adults' barred list check(s) – to be eligible to request a check of the barred lists, the position must be eligible for an enhanced level DBS certificate and be specifically listed in the Safeguarding Vulnerable Groups Act 2006 as being Regulated Activity and thus eligible to check the appropriate barred list(s):

Adults:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf Children:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Protection of Vulnerable Groups (PVG) Scheme – Scotland

The Protecting Vulnerable Groups (PVG) membership scheme is managed and delivered by Disclosure Scotland. It helps to ensure that adults are unable to partake in 'regulated work' i.e. work with children and work with protected adults, if their behaviour makes them unsuitable to do so.

'Regulated work' is defined as work with children or protected adults more than three times a month.

The aforementioned roles applicable for a DBS check in England and Wales ought to apply to join the PVG Scheme in Scotland.

Applicants in Scotland applying for this scheme must do so via the Senior Creative Learning Manager in Glasgow. As with DBS checks, ATG will keep a register of the staff, the application reference number and the expiry date only. This document should be password protected and stored securely with the Venue Administrator.

For more information on this scheme and to apply, the following web page is useful:

<https://www.mygov.scot/apply-for-pvg/>

Section 5: Safeguarding Requirements for Production Companies using Ambassador Theatre Group Venues

In using our venues, Production Companies (including professional and amateur companies and any other party hiring our venue) agree to abide by our safeguarding policy and procedures. This policy is made available via the Producer Portal for all visiting organisations to access and should be proactively shared with any visiting companies that do not have access to the portal.

It is recognised that Production Companies will bring with them their own policies and risk assessments, which should operate alongside this policy. In the event of differences between the two policies, ATG will seek to agree procedures with the Production Company and where agreement cannot be made, ATG's policies will take precedence.

The visiting Production Company is expected to inform ATG at the earliest opportunity of any age guidance, formal limits or content warnings which may be relevant to safeguarding or to whether or not their content is appropriate, particularly for children. This information is displayed on ATG's website and is requested along with marketing information when the performance is contracted and confirmed. Any changes that occur before the performance takes place should be communicated to ATG at the earliest opportunity.

If there are children/adults at risk in the production, the visiting Production Company staff must:

- Provide ATG with a specific named contact for Safeguarding.
- Inform the venue of relevant risk assessments and procedures relating to the activities of the children/adults at risk whilst in the venue, including how they will be supervised both on and offstage and by whom, how they will be signed in and out of the building, their hours of work and how they will get changed safely and provide the venue with a copy on request.
- Provide licensed chaperones in England and Wales, or chaperones who are a member of the PVG Scheme in Scotland, where required, at an appropriate adult to children ratio. If the visiting Production Company is unable to do so, they must request that the venue provides these at a company cost.
- Agree with Back of House Management and, if necessary, one of the venue safeguarding leads on suitable arrangements with regards to backstage areas including the use of toilet facilities.
- If using Front of House areas, the above also applies.
- Be able to provide evidence of performance licences upon request.

ATG reserves the right to refuse or withdraw services from any third-party organisation whose purpose, principles or actions are in conflict with this safeguarding policy. Concerns of this nature should be brought to the Theatre Director/General Manager in the first instance.

Section 6: Creative Learning and Community Partnerships Projects

The Ambassador Theatre Group recognises that making arrangements for the proper supervision of children and adults at risk is one of the most effective ways of minimising opportunities for children or adults at risk to suffer harm whilst in our care.

Our Creative Learning and Community Partnerships Departments deliver community and educational engagement through a range of projects taking place in ATG's venues and elsewhere. Examples of these include participatory workshops, tours, performance projects taking place in the venue, and programmes happening offsite such as visits to local schools and other community areas. Many projects are specifically designed for or include children, young people and adults at risk. The ATG staff member organising ("the organiser") must take the following considerations into account when organising such projects.

6.1 Project Planning

- The organiser should plan and prepare a detailed programme of activities for the children and/or adults at risk involved in a project. Planning should ensure that all children and/or adults at risk will be adequately supervised and engaged in suitable activities at all times in a space that is safe and fit for purpose.
- The organiser or Producer should organise appropriate licencing for child performers and confirm these with the venue management. Child Performance Licences should be obtained from the child's home Local Authority. It should be noted that whilst there are some subtle differences between the obtainment of performance licences in England, Scotland and Wales, the key elements for licence applications are the same. In all three countries Performance Licences must be applied for in the following instances:
 - o Any performance for which a charge is made, whether for admission or otherwise; or Performances on premises licensed to sell alcohol, for example in a hotel, a pub, a theatre;
 - o Any live broadcast performance, for example a television or radio broadcast, internet streaming;
 - o Any performance recorded (by whatever means) with a view to its use in a broadcast or such service or in a film intended for public exhibition, such as a live stage performance recorded for a cinema screening, a feature film, a video or sound recording of a performance on a website. (this does not extend to user generated content, for e.g. where young people or a family record themselves and share it on a website or social media);
 - o When children take part in sport or modelling for which payment is made (to the child or to someone else in respect of the child taking part) other than expenses.

The exceptions to these are school productions (where the school has produced the show and is responsible for its performance), auditions and where a '4 day rule' applies; this is where the child will not receive payment, and has not taken part in licensed performances on more than 3 days in the previous 6 months.

- The organiser should obtain, in writing, parental or a legal guardian's consent to children joining an organised project. This may include the purchase or booking of a ticket by a parent or guardian.
- All activities are required to be risk assessed during the planning stage and the assessment should be read, understood and any actions implemented by all involved in running the project;

each member of staff should sign the document to evidence this (see Appendix 1 for a Template Risk Assessment).

- Parents/guardians should be given full information about a project, including details of the programme of events, the activities, and the supervision ratios.

6.2 Supervision

- Anyone involved in supervising children/adults at risk must be aged over 18.
- Project managers must be satisfied that any workers involved in projects are fully competent to do so and that appropriate checks, including DBS or PVG Membership, have been made to the requisite level.
- Children must be supervised at all times, preferably by two or more workers. One or more of these may be teachers if school groups are in attendance, or group leads in the case of youth groups, community groups or similar.
- Children must not be left unsupervised at any venue, indoors or out. The exception to this is where express written permission has been granted by the parent/guardian for the child to leave unsupervised, for example during lunch breaks and travelling to/from the activity.
- Session leaders and supervising adults should know at all times where children and/or adults at risk are and what they are doing.
- Session leaders and supervising adults will monitor the behaviour of the children/adults at risk to ensure they are not putting themselves in any undue risk.
- Participants and parents/guardians should be informed of the appropriate arrival time for the session and advised not to arrive earlier as supervision cannot be provided before that point.
- Care should be taken in selecting the entrance to be used by participants, ensuring it is adequately staffed by a suitably trained person and that it does not clash with anything that may cause additional risk such as smoking points, load ins or deliveries.

6.3 Additional Recommendations

Additional recommendations for activities organised by Creative Learning and Community Partnerships or held in an Ambassador Theatre Group venue include:

- Group sizes should be appropriate to the activity, the space available and the number of supervising adults.
- An appropriate number of legally responsible ATG appointed supervisors including a session leader, and teachers if school groups are in attendance, over the age of 18 must be present. The National Society for the Prevention of Cruelty to Children (NSPCC) recommends the following adult to children ratios:
 - 0-2 years – 1:3
 - 2-3 years – 1:4
 - 4-8 years – 1:6
 - 9-12 years – 1:8
 - 13-18 years – 1:10

Please note that these are the recommended ratios, and could be subject to change depending on the task or activity. If you are ever unsure, in the first instance contact your Venue Safeguarding Lead or the Group Access and Designated Safeguarding Lead. These ratios may need amending further if the children or adults have additional needs or require additional support.

- There must be adequate space for the activity provided
- There must be access to a telephone in the building, or as an alternative, the session leader must have a working mobile phone on their person

- Equipment must meet appropriate safety standards
- The session leader and supervising adults must be aware of the location of the nearest First Aid box/boxes and the defibrillator. If an activity is happening onsite at least one member of staff must be trained in First Aid in the venue, who must be easily contactable via radio or mobile phone. In the event that an activity is taking place offsite, at least one of the supervising adults must be trained in First Aid
- Regular access to water must be provided or available on request
- Additional needs must be supported with specific arrangements depending on the individual to ensure equal access to activities. In such instances staff may wish to seek additional advice from ATG's Group Access and Designated Safeguarding Lead.
- No child under primary school age should be left under the sole supervision of ATG staff at events unless the parent, guardian or carer stays with the child.
- No school group, youth group or group from a care setting (i.e. a group which operates in loco parentis) should be left unaccompanied without a legally responsible staff member present e.g. a teacher for a school group
- The session leaders must know the evacuation procedures and should inform all additional supervising adults and the group of them at the beginning of the session
- Participants under sole ATG staff supervision should have a 'named person' to whom they may report any worries or concerns. Where participants are accompanied by a parent, carer, guardian, teacher or similar, it is assumed that that person takes this responsibility
- Contact names and work telephone numbers for 'named people' present during the activity should be visibly displayed or otherwise communicated to participants and their parent, carer, guardian, teacher or similar
- Staff and children should use separate toilets wherever possible, or if this is not possible, they should not use them at the same time as one another
- The Ambassador Theatre Group guidelines on the use of social media must be adhered to at all times (see Appendix 2 for ATG Creative Learning and Community Partnerships guidelines for social networking).

6.4 Delivering Content Online Safely

When delivering group sessions online, through a programme such as Zoom, Google Classroom or Microsoft Teams, the same principles apply to ensure the safety of all involved. The following additional considerations must be made to ensure safe online delivery:

- When deciding which online platform to use, it must fit in with Privacy Agreements made by the Ambassador Theatre Group. This can be cleared through Privacy Champions and the Legal Team.
- A full risk assessment for each activity must be completed as it would for a face-to-face session.
- Access to any online sessions must be managed by the project manager. This includes the ability to 'hold' any participants from joining before session leader is able to.
- All sessions must include at least two members of ATG staff: one lead and one support.
- Only first names and first initial of surnames must be publicly displayed e.g. John S.
- Consent forms must include an outline of behavioural expectations during the session.
- Staff delivering sessions must ensure that their location is appropriate, including consideration for sound quality and backgrounds, which must be void of any personal information or unsuitable objects. The location must not be a bedroom.
- Staff and participants must be in suitable and appropriate attire. Where possible staff must wear clothing that identifies them as staff e.g. a t-shirt or lanyard with the ATG logo.

- If the delivery platform has a 'chat' feature, this should be limited to ensure that participants can only contact the session leaders or 'everyone', to eliminate the risk of private messages being sent between participants.
- Ensure that participants are not able to record sessions, and agree that they will not use any additional devices to photograph or record using another device. Project Managers should avoid filming recording online projects. If a specific project requires the sessions to be recorded, e.g. because the record feature is to be used to film a specifically created online 'performance' or a third party request has been made due to working with a particularly at risk group, then this must first be discussed with the Head of UK Creative Learning and Community Partnerships, the Group Access and Designated Safeguarding Lead and Legal.
- If using breakout areas, these must always include at least one member of staff with the group leader being able to join any area at any time.
- Example consent forms and risk assessments can be requested from the Head of UK Creative Learning and Community Partnerships or the Group Access and Designated Safeguarding Lead.
- All sessions must be logged on a central database. Access to this must be requested from the Head of UK Creative Learning and Community Partnerships.
- The procedure for reporting concerns is the same as when delivering face-to-face sessions, and all participating staff must be made aware of the escalation process ahead of any delivery.

Section 7: Risk Management

Risk assessments and risk management should be carried out, documented and the control measures communicated to all relevant parties for every project. Creation of the risk assessment should involve as wide a range of project stakeholders as possible to ensure that everyone understands their responsibilities and all risks are identified and controls put in place.

7.1 Risk Assessment in Relation to Safeguarding

The principle of a risk assessment is to consider:

- The practical details of a project
- Things that could go wrong in a project
- The likelihood of things going wrong
- The impact of these things going wrong

Once this is done you can:

- Identify measures to reduce the risk
- Decide what to do if things go wrong
- Allocate roles to monitor and manage safeguarding

See Appendix 1 for a Template Risk Assessment.

Risk Assessments should be updated in response to any near misses, incidents, training or material policy updates.

Section 8: Photographic Procedures

On occasion the Ambassador Theatre Group uses photography and films for publicity and marketing purposes, as well as part of the services it provides. As such it may be necessary to photograph or film children or adults at risk engaging in activities organised by our venue teams. In such instances you should:

- Avoid using children's names in photographic captions. If the child is named, avoid using his or her photograph. If the photograph is used, avoid naming the child
- Always obtain the child's/adult at risk's permission to use their image.
- Always obtain written consent from a parent/guardian/carer for a child to be photographed/filmed (see Appendix 3 for an example Consent form for the use of photographs and video).
- Only use images of children/adults at risk in appropriate dress to reduce the risk of inappropriate use. Some activities including drama present a greater risk of potential misuse.
- Always issue written expectations of professional photographers or the press who are invited to an event, making clear the organisation's expectations of them in relation to safeguarding. Please see Appendix 6 Press and Third Party Photography for a template agreement.
- Do not allow photographers unsupervised access to children or adults at risk.
- Do not approve photography sessions outside the agreed venue/location or at a child's home.
- If a public event is being held which will include press or professional photography, signage should be placed around the venue informing the public of this.

Section 9: Children/Adults at Risk as Audience Members

We have many people attend our venues in a range of capacities and we have a duty of care to ensure their safety. Whilst in our facilities therefore we have processes in place as follows.

9.1 Children as Audience Members

Children under 5 should not be admitted to performances except where specifically stated at the time of booking, for example for children's and family shows. Children under the age of 18 months will not be admitted to any performance unless they are specifically aimed at them (i.e. children's shows and pantomimes), where they are classed as 'Babes in Arms' and therefore do not require a ticket (except in our Scottish venues where a ticket is required).

Children aged 15 years and below must be supervised at all times by an adult aged 18 or above when visiting an ATG venue, with at least one adult to every 10 children (see section 5.3 for NSPCC recommended ratios).

When groups, such as school groups and youth clubs, are visiting one of our venues, the ratio of adults to children should again be at least 1:10. If a staff member is concerned about a particular group, the Duty Manager may wish to request a copy of the group's Risk Assessments for visiting the theatre in advance. In certain instances, with older secondary school aged groups, this ratio may be more flexible. This is at the Duty Manager's discretion, for which they may request to see the Risk Assessment.

The above are also applicable under the ATG Ticketing Terms and Conditions: 14. Conditions of Admission and Attendance.

The only exception to the above is the Nova Cinema in Woking, where the Terms and Conditions differ. In the Nova Cinema, children under the age of 8 must be accompanied by an adult at all times. Children under the age of 12 must be accompanied by an adult to watch any film with a 12A certificate, and children under the age of 12 must be accompanied by an adult to watch any films starting at 7pm or later. It is also explicitly stated that parents and guardians shall at all times remain responsible for their child(ren) whether or not they are accompanied. Unless expressly stated otherwise, performances starting at or after 10:30pm are strictly for those aged 18 or over regardless of the film's age certificate. These are applicable under the Nova Cinema Terms and Conditions: 8. Age Restrictions.

9.2 Responding to Allegations Made by Audience Members

If ATG staff witness a suspected crime or incident causing immediate harm, they should consider whether the emergency services are required using personal judgement. If it is decided that the Police should be called, they should be contacted via 999 or 101 as appropriate. This depends on the urgency of the call: 999 should only be used for emergency assistance when an individual is at immediate risk of harm. Please note the 101 service may direct you to an online form.

If a customer accuses another customer of a crime or safeguarding incident, ATG staff should firstly offer support and reassurance to the people involved. Note the seat numbers of both parties to assist in any later response or investigation. However, ATG staff are not expected to take on the role of 'detective', as this may impact any criminal investigation, should this be deemed necessary by the Police.

In the instance that an audience member accuses another audience member of inappropriate behaviour staff will need to request support from the duty manager who should take the lead. It may not be obvious that a crime has been committed, and it may be the word of one customer against another, so it is important to remain impartial. Consider the following:

- There are many variables that will affect each situation and so personal judgement will need to be used. Be aware of how your own unconscious bias and prior experiences may affect your approach to both customers and situation.
- Is support from security staff required? Remember this should be proportionate.
- Did any other ATG staff directly witness the situation?
- Have any other customers voluntarily come forward as having directly witnessed the incident?
- Is it appropriate and safe to approach the accused party and ask for their version of events? Remember having an accusation made against them may also be upsetting.
- Customer's stories may not align; consider if 'reporting back' to the customer making the complaint is necessary. In some circumstances an apology for the experience and a commitment that we will investigate may be an appropriate resolution.
- Is it appropriate to simply reseat the customers involved?
- Is it appropriate to offer the customer the chance to come back another time?
- If we do need further discussion with the customer making a complaint, move outside the auditorium. What does customer want to happen next? Politely ask the person how they wish to proceed with their accusation.
 - You could say 'How do you wish to proceed?', 'Is there anything else you'd like us to do?' or 'What would you like to happen next?'
 - If they would like to contact the police, staff should offer the use of a telephone and private place to call. If the person making the accusation is an adult with the capacity to do so, they ought to be the one to contact the police.

- If they have attended with a carer or other adult, they may wish to call the police on the person's behalf. If the person making the accusation is a child, the adult responsible for them should call the police.
- If the person requests that we contact the police on their behalf we can make contact but please note the police will still wish to speak to the individuals involved.
- Customers may ask for another person to be ejected. Please refer to our Security Policy; we would not usually immediately eject someone on the basis of an unwitnessed accusation unless there is an immediate risk of harm. We can further monitor the situation to see if the behaviour is witnessed as described in the Security Policy. If the customer is not happy with this they may choose to make a formal complaint, leave, or contact the police themselves (see above). We will always cooperate with any police investigate that may arise.
- Remember we should not provide legal advice to customers, advise customers on whether or not something is a crime, or give personal opinions or judgements on either party.

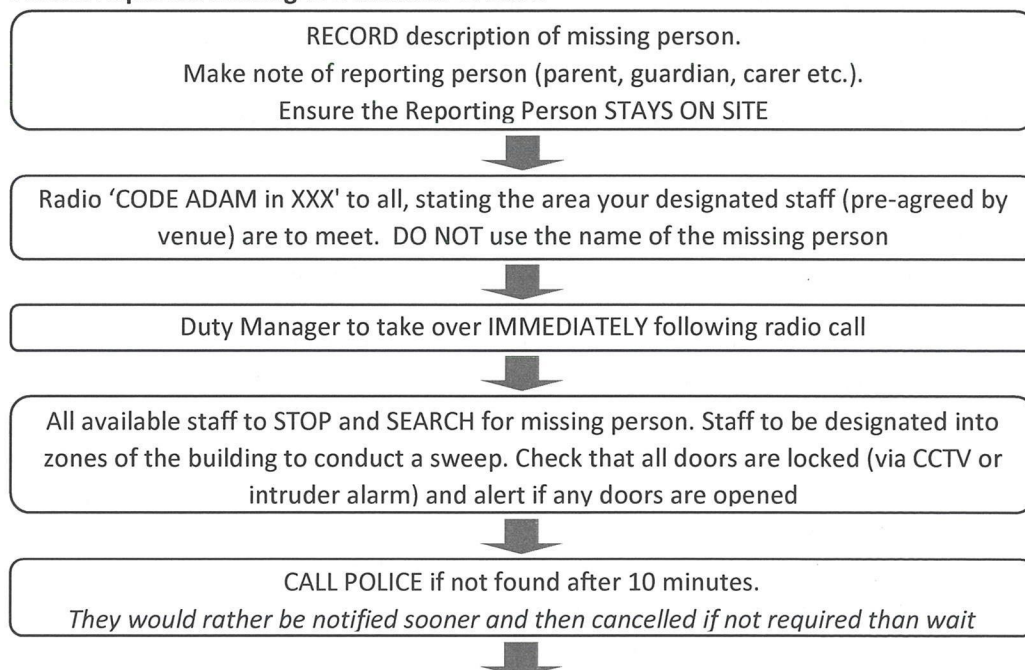
Always seek to identify both parties, noting at least their seat number in case they need to be contacted at a later stage. We do not have any powers to take names or identifying details from customers if they do not wish to give them, so recording the seat numbers is essential. You should also attempt to record seat moves wherever possible and reasonable to do so.

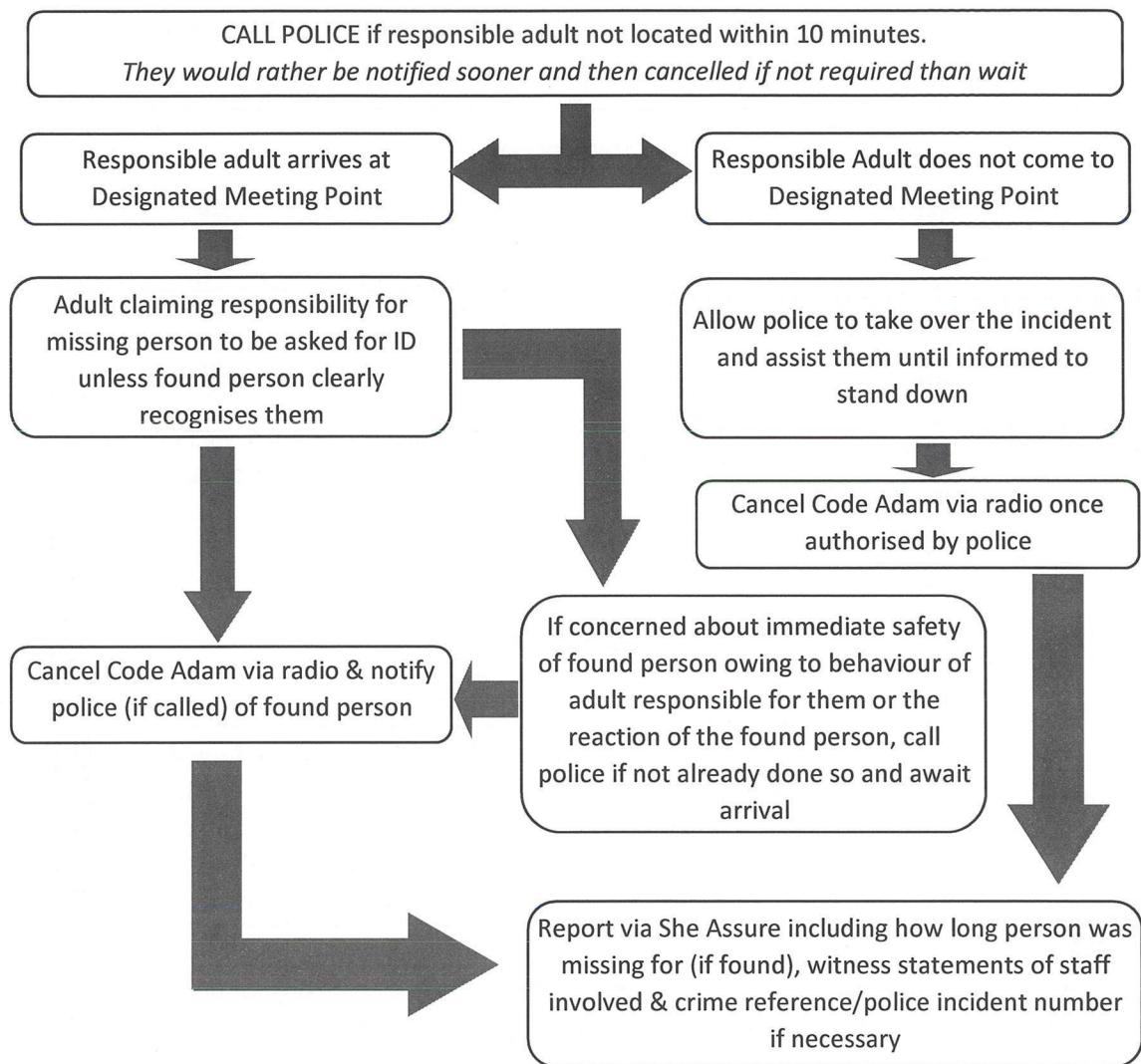
The incident should always be reported via the ATG incident reporting system.

Section 10: Missing Persons

A missing child or adult at risk in one of our venues should be classed as a priority incident, exceeded only by imminent threat to life and is communicated via the use of 'Code Adam'. The recommended procedures are as follows.

10.1 Person Reported Missing to a member of staff:





Section 11: Response Procedures

The Ambassador Theatre Group recognises the importance of having clear procedures to enable staff to handle situations where an appropriate response is needed to safeguarding concerns. Children and adults at risk may be abused by an adult or adults, or a child or children.

All safeguarding-related incidents must also be reported via ATG's incident reporting system. These will be void of all personal details but must include the staff member who handled the incident/allegation, a summary of the incident/allegation, who it was referred to and the outcome. If reported to the Police, a crime reference number must be logged. If reported to the local authority and a reference number is given, this should also be logged.

Please see Appendix 4 for a template form for reporting suspected abuse.

Please see Appendix 5 for a template poster which must be displayed in a prominent place in each venue or workplace, displaying the relevant contact details outlined in the response procedures below.

11.1 Responding to a Disclosure of Abuse

If a child or adult at risk discloses abuse to any member of staff, the following procedure should apply:

1. Listen to them and let them speak without interruptions
2. Explain how you intend to proceed honestly. DO NOT promise that you will keep it a secret.
3. As soon as possible following the disclosure, record exactly what was said in writing (template available in Appendix 6), sign and date the document.

Following this, EITHER:

- a. Contact the police IF the child's/adult at risk's safety is deemed to be IMMEDIATELY COMPROMISED.
- b. Report incident to Venue Safeguarding Lead and/or Group Access and Designated Safeguarding Lead OR:
 - a. Report to Line Manager, who will refer it to the Venue's Safeguarding Lead
 - b. The Venue's Safeguarding Lead will report it to the Group Access and Designated Safeguarding Lead. Together they will decide whether to:
 - i. Call the Police/an Ambulance
 - ii. Contact LADO (Local Authority Designated Officer)/MASH (Multi Agency Safeguarding Hub) in England or Local Children's Social Work Team/Local Children's Reporter in Scotland to discuss making a referral

REMEMBER: It is important that everyone in the organisation is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is a task for the professional agencies following a referral to them of a safeguarding concern.

If something is divulged to you remember to seek support for yourself. Internally your line manager, the Group Access & Safeguarding Lead, HR department and employee wellbeing services are available to you. Agencies such as NSPCC, Childline and Samaritans will also be able to help you if preferred. However, anything that has been divulged must be kept confidential.

If you believe them to be at IMMEDIATE RISK of serious threat or harm, always call the police immediately using 999.

There is always a possibility that the police may not arrive immediately when called. In such situations we should act in accordance with this policy as far as is possible but should not seek to restrain, detain or otherwise force people to await the arrival of the police. It is essential to record at least the seat numbers of the relevant customers to enable any police investigation that may follow.

11.2 Responding to Signs or Suspicions of Abuse

If any staff member is concerned about the welfare of a child or adult at risk, the following procedure should apply:

1. If you believe the child/ adult at risk to be at IMMEDIATE RISK of serious threat or harm, call the police immediately. If this is not the case, go straight to Step 2.
2. Discuss concerns with Manager/Senior Colleague and Venue Safeguarding Lead

If the Manager/Senior Colleague and Venue Safeguarding Lead agree with your concern:

1. Venue Safeguarding Lead informs Group Access and Designated Safeguarding Lead, and together they decide whether to:
 - a. Call the Police/an Ambulance
 - b. Contact MASH (Multi Agency Safeguarding Hub) in England and Wales or Local Children's Social Work Team/Local Children's Reporter in Scotland, or other Local Authority Safeguarding Contact, to discuss making a referral

If the Manager/Senior Colleague and Venue Safeguarding Lead decide not to take this further, and you no longer have concerns:

1. No further action is necessary, however staff involved may wish to monitor and review in Risk Meetings in case concerns arise again

If the Manager/Senior Colleague and Venue Safeguarding Lead decide not to take this further, and you still have concerns:

1. Refer your concerns to the Group Access and Designated Safeguarding Lead
2. If you still have unresolved concerns you may choose to report your concerns to the police or local authority yourself.

If you are unable to contact the relevant Venue Safeguarding Lead or Group Designated Safeguarding Lead, contact your Business Manager or Business Director. If you are unable to contact any of the above and you are unsure whether an incident is urgent, call the police non-emergency number 101 or contact your local authority contacts as above for advice.

11.3 Responding to Allegations of Abuse against Workers

If a staff member is concerned about another worker in relation to safeguarding, or a concern is raised by a third party, the following procedure should apply:

1. Record concern and report worker to your Venue Safeguarding Lead or Venue Management. Wherever possible, this should be within the same working day of the allegation coming to light
2. Immediately ensure that the person has no access to children or adults at risk completely without prejudice
3. Line Manager/Venue Safeguarding Lead considers all facts and information, seeking additional advice from HR and Group Access and Designated Safeguarding Lead

If they decide that no further action needs to be taken, and you are no longer concerned:

1. Revert to normal Operation and review as appropriate

If they decide that no further action needs to be taken, and you are still concerned:

1. Refer to next Senior Manager, Group Access and Designated Safeguarding Lead and/or HR
2. When all options have been exhausted, refer to ATG's Whistleblowing Policy

If a safeguarding risk is determined:

1. Refer to HR & Group Access & Designated Safeguarding Lead, who will advise whether to report to children's services and/or police
2. Discuss suspension of worker with investigating agencies while the investigation is ongoing 3. Ensure the referral is reported to the relevant LADO (Local Authority Designated Officer)

If concerns are ongoing but not in the category of safeguarding:

1. Refer to ATG's Disciplinary Procedure/HR

Section 12: Recording and Sharing Information

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, it is vitally important to record the details of an allegation or reported incident, regardless of whether or not the concerns are shared with a statutory child protection agency.

An accurate note should be made of:

- Date and time of the incident or disclosure
- Parties who were involved
- What was said or done and by whom
- Any action taken by ATG to investigate the matter
- Any further action e.g. suspension of a worker
- Where relevant, reasons why there is no referral to a statutory agency
- Names of persons reporting and to whom reported.
- Be careful not to put in personal feelings, comments or judgements.

The record should be clear and factual as it may be needed by safeguarding agencies investigating the incident and may, in the future, be used as evidence in court.

Please refer to the Security Policy for procedures on the use and sharing of CCTV recordings.

12.1 Confidentiality Policy, and Retention and Storage of Documentation

As a general rule, all personal information that is acquired or held in the course of working with children and adults at risk should be treated as confidential. Particular care should be taken with sensitive information by ensuring locked access or password protection.

Consideration should also be given to the General Data Protection Regulation 2018. The Ambassador Theatre Group has a written policy on these matters which is available to those who wish to see it on request.

12.2 Handling and Safekeeping of Disclosure Information

As an organisation using the Disclosure and Barring Service to help assess the suitability of applicants for positions of trust, the Ambassador Theatre Group complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure Information.

The Ambassador Theatre Group uses an Umbrella Body to process DBS checks in England and Wales. PVG Applications in Scotland are processed by Disclosure Scotland. ATG will therefore only record the date of a Disclosure, expiry and the reference number. We must not hold any Disclosures ourselves. As a matter of good practice:

- Disclosure information will never be kept in an applicant's personnel file and is only passed to those who are authorised to receive it.
- We recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it, including ATG staff who are not directly involved in the decision-making process.
- We do not keep disclosure information for any longer than is absolutely necessary. This is generally a period of at least 1 year after the staff member has left the organisation, unless otherwise advised, to allow for consideration and resolution of any disputes.

- If a disclosure is passed onto the LADO or MASH team, or the Local Children's Social Work team, it is advised that staff also seek advice on the Privacy Policy.

12.3 The Seven Golden Rules to Sharing Safeguarding Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared. Before sharing any data, a Privacy Impact Assessment must be carried out. Guidance on how to do this can be found on The Hub > About Us > Privacy > Conducting a Privacy Impact Assessment.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Share when: necessary, proportionate, relevant, adequate, accurate, timely and secure. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendices

The following documents can be found on the [ATG Risk Management Information Hub](#).

Appendix 1: Template Risk Assessment

Appendix 2: ATG Creative Learning and Community Partnerships guidelines for social networking

Appendix 3: Consent form for the use of photographs and video

Appendix 4: Template Form for Reporting Abuse

Appendix 5: Template Reporting Contact Details Poster

Appendix 6: Press & Third Party Photography