Theatretrain Ltd

SAFEGUARDING POLICY 2026

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What to do if you have a welfare concern at Theatretrain

Listen, record and refer without delay

1 NOTICE	**Recognise a concern.** Take a disclosure, change in behaviour or appearance, or online incident seriously. Safeguarding concerns can happen in person or online.
2 RESPOND	**Listen and reassure.** Stay calm, listen, reassure the child and do not promise secrecy. Ask only open questions needed to understand immediate safety. If there is immediate danger, alert the DSL at once; call 999 in an emergency.
3 RECORD	**Write it down promptly.** Use the Theatretrain concern form. Record the date, time, facts and the child's own words; separate what you saw or heard from your opinion. Do not investigate.
4 REPORT	**Tell the DSL or deputy.** Pass the concern and record to the DSL or deputy without delay. If they are unavailable and the concern is urgent, contact the Theatretrain Head Office Safeguarding Team.
5 REFER	**Use the current local pathway.** The DSL assesses the concern and follows the local route for Family Help, children's social care or police, including MASH where it remains the local route. Share information needed to protect the child.
6 REVIEW	**Record, monitor and escalate.** The DSL records decisions and reasons, monitors the child's safety and re-refers if needed. If you remain concerned about the response, speak to the Head Office Safeguarding Team or the relevant local authority or police.

Always report a concern. Do not investigate or delay a referral while seeking permission.

1. Introduction and ethos

Theatretrain and all those directly connected (franchisees and their staff, volunteers, parents, families, and children) have an essential role to play in ensuring safe and secure environments for service users. Theatretrain recognises our moral and statutory responsibility to safeguard and promote the welfare of all children.

Theatretrain recognises the importance of providing an ethos and environment within the organisation that will help children to feel safe, secure, and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.

Theatretrain's core safeguarding principles are:

- It is a whole organisation responsibility to safeguard and promote the welfare of children as its paramount concern.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings considered.
- All staff and volunteers understand safe professional practice and adhere to our code of conduct and other associated policies.
- All staff and volunteers have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

There are four main elements to our safeguarding policy.

- **Prevention** (positive, supportive, safe organisation culture, curriculum and pastoral opportunities for children, safer recruitment procedures)
- **Protection** (by following the agreed procedures, ensuring all staff and volunteers are trained and supported to respond appropriately and sensitively to safeguarding concerns)
- **Support** (for all children, parents and staff and volunteers, and where appropriate specific intervention for those who may be at risk of harm)
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

The procedures contained in this policy apply to all staff and volunteers and are consistent with those of the Local Safeguarding Children's Partnership Arrangements where each franchise is geographically located.

2. Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes guidance:

Keeping Children Safe during community activities, after-school clubs, and tuition"– DfE 2022

Keeping children safe in education - GOV.UK (www.gov.uk) – updated 2026

Working together to safeguard children - GOV.UK (www.gov.uk) – updated 2026

Local Safeguarding Children's Partnership Arrangements where each franchise is geographically located.

3. Definition of safeguarding

"Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to children's welfare, health, and safety."

All safeguarding policies will be reviewed on an annual basis (minimum) by the Company Director who has responsibility for oversight of the organisations' safeguarding and child protection systems.

The Designated Safeguarding Team within every franchise, will ensure reporting on safeguarding activity and systems within their franchise to the Company Director through the submission of the following form: Safeguarding Reporting to Head Office

The Company Director will not receive details of individual child situations or identifying features of families as part of their oversight responsibility.

Theatretrain acknowledges that this policy will incorporate a range of specific safeguarding issues including (but not limited to):

- Bullying (including cyberbullying)
- Children and the court system
- Children Missing Education (CME)
- Children with family members in prison
- Child missing from home or care.
- Child Sexual Exploitation (CSE)
- Child criminal exploitation (County Lines)
- Domestic Abuse

- Homelessness
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage.
- Gangs and youth violence
- Gender based abuse and violence against women and girls.
- Hate
- Honour based abuse.
- Mental health
- Missing children and adults
- Online safety
- Child-on-child abuse
- Prevent duty (radicalisation and extremism)
- Private fostering
- Relationship abuse
- Sexual violence and sexual harassment between children
- Human trafficking and modern slavery
- Sexual violence and sexual harassment, including online and AI-assisted harassment
- 'Up skirting'
- Making or sharing nudes and semi-nudes, including AI-generated or digitally altered imagery

Every member of staff and volunteer at Theatretrain recognises that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

4. Related safeguarding policies/procedures

We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in Theatretrain's integrated safeguarding portfolio and should be read in conjunction with the policies/procedures as listed below.

The policies below can be found on the Company Dropbox or Upload Zone of the website - Theatretrain Policies & Procedures

Within the training manual please reference:

- Data Privacy
- Health and Safety
- Risk Assessment templates
- First Aid and Accidents
- Student Behaviour, rewards, and sanctions
- Anti-bullying

- Online Safety
- Social Media
- Use of Images
- Anti-Drugs Policy
- Physical and Intimate Care
- Managing Allegations Against Staff
- Code of Conduct
- Safer Recruitment Policy
- Whistle-blowing Policy
- General Incident Form
- Forms for Concern
- Gift and Hospitality
- Physical Restraint
- Complaints Procedure

Supporting Guidance

"Keeping Children Safe during community activities, after-school clubs and tuition" – DfE 2023

"Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium, February 2022"

"What to do if you are worried a child is being abused" – DfE, March 2015

Keeping children safe in education - GOV.UK (www.gov.uk) – updated 2026

Working together to safeguard children - GOV.UK (www.gov.uk) – updated 2026

Local Safeguarding Children's Partnership Arrangements where each franchise is geographically located.

5. Key responsibilities

Everyone who encounters children, and their families has a role to play in safeguarding children.

The Company Directors and the Franchisors have read and will follow Working together to safeguard children - GOV.UK (www.gov.uk) (updated 2026). Further information regarding the key strategic responsibilities of the Franchisee's and the Franchisor are identified in ***Appendix 1.***

Theatretrain has a HO Safeguarding Team who are the lead for safeguarding and are named on the front of this document. The nominated person(s) will take the lead role in ensuring that Theatretrain has an effective policy which interlinks with other related policies that locally agreed procedures are in place and being followed; and that the

policy and structures supporting safeguarding children are reviewed at least annually. The HO safeguarding team will ensure DSL(s) are properly supported in this role at a time and resource level.

5.1 Designated Safeguarding Lead (DSL) – Company Director

Theatretrain has appointed the Company Director as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in organisation.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by the Local Safeguarding Children Partnership.

The DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals, at least annually, to keep up with any developments relevant to their role.

Every franchise has appointed additional staff to deputise for the DSL. Deputy DSLs will have attended appropriate training, which enables them to fulfil this role. Whilst the activities of the designated safeguarding lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead and this responsibility will not be delegated.

It is the role of the DSL to:

- Act as the central contact point for all staff and volunteers to discuss any safeguarding concerns.
- Maintain a confidential recording system for safeguarding and child protection concerns.
- Coordinate safeguarding action for individual children.
- Liaise with other agencies and professionals in line with Working together to safeguard children.
- Ensure that locally established procedures are followed and referrals made through the current local pathway, including Family Help and children's social care as appropriate.
- Represent, or ensure the franchise is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences).
- Manage and monitor the franchise's part in Family Help, child in need and child

protection plans, or equivalent local arrangements.

Be available during organisation's operating hours for staff and volunteers in the franchise to discuss any safeguarding concerns.

Ensure all staff and volunteers access appropriate safeguarding induction, supervision and training with relevant updates in line with the recommendations across government guidance documents and trends emerging across Theatretrain.

5.2 Members of staff and volunteers

All members of staff and volunteers have a responsibility to:

- provide a safe environment in which children can engage and learn.
- ensure all children can develop appropriate strategies to recognise and respond to risk and build resilience.
- identify and recognise children who may need extra help, who are suffering, or are likely to suffer significant harm.
- provide help for children, where appropriate and reasonable.
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed.
- safeguard children's wellbeing and maintain public trust as part of their professional duties.
- maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child.
- respond to and refer any concerns about children or other members of the community in accordance with this policy.
- contribute towards and comply with Theatretrain policies; read Keeping Children Safe in Education Part One in full as required by this policy, and complete the associated declaration.

All members of staff and volunteers in Theatretrain know what to do if a child tells them he/she is being abused or neglected. Members of staff and volunteers know how to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff and volunteers know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child. See **appendix 4** for advice for staff and volunteers on responding to safeguarding concerns.

The welfare and safety of children are the responsibility of all staff and volunteers within the franchise and ANY concern for a children's welfare MUST always be reported to the Designated Safeguarding Lead(s).

5.3 Children and young people

Children and young people (children) have a responsibility to:

- Seek help from a trusted adult if things go wrong, and support others that may be experiencing safeguarding concerns.

- Develop and take responsibility (at a level that is appropriate to their individual age, ability, and vulnerabilities) for keeping themselves and others safe, including online.

5.4 Parents and Carers

Parents/carers have a responsibility to:

- Read the relevant organisation/policies and procedures, encouraging their children to adhere to them, and adhere to them themselves where appropriate.
- Discuss safeguarding issues with their children, support Theatretrain in their safeguarding approaches, and reinforce appropriate safe behaviours at home.
- Identify and share with the DSL and concerns of any nature including mental health, physical health, care plans or other relevant information.
- Seek help and support from Theatretrain, or other appropriate agencies, if they or their child encounters any safeguarding concern.

A statement in the information sent to parents will inform parents and carers about our Theatretrain duties and responsibilities under child protection and safeguarding procedures.

Parents can obtain a copy of Theatretrain's Child Protection Policy and Complaints Procedure via the Theatretrain website www.theatretrain.co.uk and other related policies on request.

6. Recognition and categories of abuse

All staff and volunteers within Theatretrain should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions and possible indicators and signs of abuse are found in Appendix 2. "What to do if you are worried a child is being abused" – DfE, March 2015

Members of staff and volunteers are made aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community

setting, by those known to them or by a stranger. They may be abused by an adult or adults, or another child or children. Children may be abused via the internet by their peers, family members or by unknown and in some cases unidentifiable individuals. In the case of honour-based violence, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development, and well-being.
The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so staff and volunteers should also be alert to parent-child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

7. Staff and volunteers' induction, awareness, and training

The DSL will ensure that all new staff and volunteers are appropriately inducted in regard to Theatretrain's internal safeguarding procedures and communication lines. An induction checklist is available to be given to staff and volunteers to support this process.

All staff and volunteers will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:

At induction, and whenever a new annual edition is issued, every member of staff and every volunteer must read the full current Part One of Keeping Children Safe in Education. The overview for all staff is a useful quick reference but does not replace Part One. Each person must sign and date the Theatretrain KCSIE Part One reading declaration; the franchise must retain the completed declaration with its safeguarding and training records.

- **Recognise** potential safeguarding and child protection concerns involving children and adults (colleagues, other professionals and parents/carers).
- **Respond** appropriately to safeguarding issues and take action in line with this policy.
- **Record** concerns in line with Theatretrain policies.
- **Refer** concerns to the DSL and be able to seek support external to Theatretrain if required.

Staff and volunteers will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to

the likes of drug taking, alcohol abuse, child-on-child abuse such as bullying and making or sharing nudes and semi-nudes, including AI-generated or digitally altered imagery, can put children in danger. The staff and volunteers training will also include organisation responsibilities, Theatretrain child protection procedures, online safety, safe working practice and external reporting mechanisms.

All staff and volunteers will receive regular safeguarding and child protection updates, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff and volunteers will be made aware of Theatretrain's expectations regarding safe and professional practice via the Code of Conduct which is provided and discussed as part of the induction process.

Theatretrain recognises the expertise which members of staff and volunteers build by undertaking safeguarding training and managing safeguarding concerns on a daily basis.

Where requested by the Company Director, the DSL will provide an overview detailing the safeguarding training undertaken by all staff and volunteers and will maintain up to date registers of who has been trained.

Child Protection Training Expectations for All				
Course Title	**When**	**How**	**For Whom?**	**How Often?**
Induction to Theatretrain	Before the start date with the company	With individual franchisee	Everyone in the company	Start date only
Child Protection Awareness Course	Within the first 3 months of the start date	https://hsqe.co.uk/courses/safeguarding-children/	Everyone in the company	Renewal cycle of 2 years. Cannot expire to be compliant
Child Protection Designated Safeguarding Lead DSL				
Course Title	**When**	**How**	**For Whom?**	**How Often?**
DSL Training	When starting in the Company	https://hsqe.co.uk/courses/designated-safeguarding-lead-children/	All Franchisees and names DSL's	Completed on a 2 yearly cycle. Cannot expire to be compliant.
Head Office Safer Recruitment Training				
Course Title	**When**	**How**	**For Whom?**	**How Often?**
Safer Recruitment Training	Mark Everard has undertaken this course.	https://hsqe.co.uk/courses/safer-recruitment/	DSL for TT Head Office	Completed on a 2 yearly cycle. Cannot expire to be

				compliant.

8. Safe working practice

All members of staff and volunteers are required to work within clear guidelines on Safe Working Practice within Theatretrain's Code of Conduct.

Children may make allegations against staff and volunteers in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff and volunteers should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interaction or work with individual children or parents to be conducted in view of other adults.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness.

Staff and volunteers should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in Theatretrain's Social Media Policy / Code of Conduct.

Staff and volunteers may only engage in lone working as a part of their everyday practice as per the Lone working Policy. All staff and volunteers must ensure they have read and understood the Lone working policy.

9. Staff and volunteer's supervision and support

Any member of staff or volunteer affected by issues arising from concerns for children's welfare or safety can seek support from the DSL team.

All new staff and volunteers will receive induction training and have a named manager with whom they can discuss concerns including safeguarding concerns.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if staff and volunteers have any concerns about a child's safety or welfare.

Theatretrain will provide appropriate supervision and support for all members of staff and volunteers to ensure that:

- All staff and volunteers are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- Theatretrain Company Directors are able to create an environment where members of staff and volunteers feel able to raise concerns and feel supported in their safeguarding role.
- All staff and volunteers have regular reviews of their own practice to ensure they improve over time.

10. Safer recruitment

Theatretrain is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our children and have their welfare and protection as the highest priority. The Franchisors and Company Directors are responsible for ensuring that Theatretrain follows a safe recruitment process outlined within guidance, including accurate maintenance of the Single Central Record (SCR); and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role.

From 1 September 2026, the supervision exemption for volunteers undertaking regulated activity with children has been removed. A volunteer who teaches, trains, instructs, cares for or supervises children is in regulated activity when the activity is carried out frequently or meets the period condition: on more than 3 days in a 30-day period, or overnight between 2am and 6am. Supervision by a checked member of staff does not remove this requirement. Before a volunteer starts regulated activity, Theatretrain must obtain an Enhanced DBS check with Children's Barred List information and complete the other applicable safer-recruitment checks. Occasional volunteering that does not meet the regulated-activity criteria remains subject to a role-specific safeguarding risk assessment and the checks required for that role. The DSL or person responsible for recruitment must confirm eligibility and checks before the activity begins.

The Franchisors and Company Directors responsible for recruitment have completed accredited Safer Recruitment Training in line with government requirements.

Please see the Safer Recruitment policy.

11. Safeguarding and child protection procedures

Theatretrain adheres to the Local Safeguarding Children's Partnership guidance.

Additional guidance for staff and volunteers includes:

- Information sharing: advice for practitioners – DfE, July 2018
- "What to do if you are worried a child is being abused" – DfE, March 2015
  Page 12 identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff and volunteers are expected to be aware of and follow this approach:

It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

The role of Theatretrain in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.

- To help with this decision s/he may choose to consult with deputy designated safeguarding leads and the Senior Management Team where appropriate.
- Advice may also be sought from the Local Children's Social Care Team or the relevant LA where a child resides.
- Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

All staff and volunteers must understand how to recognise emerging needs and pass concerns promptly to the DSL. The DSL will follow the current local multi-agency arrangements for early help and Family Help in the area where the child lives. Local terminology, thresholds, forms and referral routes differ between areas and must be confirmed in the franchise's local contacts and procedures.

Where additional support is needed, the DSL will work with the child and family, where appropriate, and use the local authority and safeguarding partners' current pathway. Depending on local arrangements, this may be described as Family Help, targeted early help or another local offer. The DSL will record the action, review whether support is improving the child's situation, and escalate to children's social care or the police when the threshold or urgency requires it. Do not rely on a historic CAF or Early Help form if the local authority has replaced it with a current process.

New referrals to services will be made using the agreed local authority protocols in the location where the child resides. These will be made with reference to the Interagency Threshold Criteria for Children in Need in each locality.

In situations where there are felt to be urgent or grave concerns, a telephone referral will be made prior to the form being completed and sent to the Duty Social Work Team. Concerns for children who are already known to services will be passed to the allocated worker / Team.

All staff and volunteers must know how to raise a concern with the DSL without delay. The

DSL will use the current local referral route for children's social care and any multi-agency safeguarding arrangements, including MASH where that remains the local route, and will follow statutory procedures for assessments under the Children Act 1989.

In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so.

In the absence of the availability of the DSL or DDSL to discuss an immediate and urgent concern, staff and volunteers can seek advice from the HO Safeguarding Team.

If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

On occasions, staff and volunteers may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff and volunteers should feel able to clarify with the DSL further progress, so that they can reassure themselves the child is safe and their welfare is being considered.

If following this process, the staff or volunteer remains concerned that appropriate action is not being taken, then the member of staff or volunteer should seek further direct consultation from the MASH who will be able to discuss the concern and provide further advice on appropriate action to be taken.
If after a referral a child's situation does not appear to be improving then the DSL (or the person that made the referral) will press for reconsideration to ensure that Theatretrain's concerns have been addressed and, most importantly, that the child's situation improves.

Professional disagreements (escalation) will be responded to in line with the local safeguarding children's partnership arrangements.

12. Record keeping

Staff and volunteers will record any welfare concern that they have about a child on Theatretrain's safeguarding incident/concern form (with a body map where injuries have been observed) and pass them without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated.

All safeguarding concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing. If members of staff and volunteers are in any doubt about recording requirements staff and volunteers then they will discuss their concerns with DSL.

Incident/concern forms are kept at the Centre with you during lesson times and taken to any events off site, copies of these are available on the Company Dropbox and

download area of the Company website.

Safeguarding records are kept for individual children and separate from all other records relating to the child in organisation. They are retained centrally and securely by the DSL and are shared with staff and volunteers on a 'need to know' basis only.

The Franchisors will be kept informed of any significant issues by the DSL.

All safeguarding records will be forwarded in accordance with data protection legislation to a child's subsequent organisation/setting, under confidential and separate cover to the new DSL (Franchisee) and a receipt of delivery will be obtained.

13. Working with other agencies

Theatretrain recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

Theatretrain is not the investigating agency when there are child protection concerns and Theatretrain will therefore pass all relevant cases to the statutory agencies. We will however, contribute to the investigation and assessment processes as required, and recognise that a crucial part of this may be in supporting the child while these take place.

Theatretrain recognises the importance of multi-agency working and will follow the current local arrangements for early help, Family Help, child in need and child protection. Staff and volunteers will attend relevant safeguarding meetings when requested and appropriate.

Theatretrain's DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

14. Confidentiality and information sharing

Theatretrain recognises that all matters relating to child protection are confidential. The DSL will only disclose information about a child to other members of staff and volunteers on a need-to-know basis.

All members of staff and volunteers must be aware that whilst they have duties to keep any information about children, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. All staff and volunteers must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in appendix 4.

Information sharing: advice for practitioners – DfE, July 2018 provides further detail.

15. Complaints

Theatretrain has a Complaints Procedure available to parents, children/child's and members of staff and volunteers who wish to report concerns. This can be found on the website www.theatretrain.co.uk

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff and volunteers or volunteer will be dealt with under the specific Procedures for Managing Allegations Against Staff policy. This can be found on the Company Dropbox and the download area of the website.

16. Allegations against members of staff and volunteers

Theatretrain recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the DSL who will first contact the Designated Officer (LADO) to agree further action to be taken in respect of the child and staff and volunteer. In the event of allegations of abuse being made against the DSL then staff and volunteers are advised that allegations should be reported to the Franchisor.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Company Director.

All members of staff and volunteers are made aware of Theatretrain's Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Members of Staff and volunteers can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff and volunteers can call: **0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday)** or email: **help@nspcc.org.uk**

For specific guidance on how to respond to allegations against staff and volunteers, please refer to the "Managing Allegations Against Staff Policy" and "Whistle Blowing Policy" found on the Company Dropbox and download area of the Company website.

17. Allegations against children / child-on-child Abuse

Theatretrain recognises that children can abuse other children. Child-on-child abuse can happen in person or online, may be repeated or a one-off incident, and can include (but is not limited to):

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment
- making or sharing nudes and semi-nudes, including images created or altered using AI or other digital tools
- and initiation/hazing type violence and rituals.
- prejudice-based and discriminatory bullying or abuse, including racism, faith-based prejudice, homophobic, biphobic or transphobic abuse, disability-related abuse and other prejudice-based harm;
- misogynistic or misandrist attitudes and behaviour, including sexualised or degrading language and conduct;
- online or AI-assisted sexual harassment, including creating, manipulating, sharing or threatening to share sexual images or content;
- making or sharing nudes or semi-nudes, whether consensual or non-consensual and whether genuine, digitally altered or AI-generated. An image does not need to be genuine to raise a safeguarding concern or potentially engage criminal law. Staff must respond to the safeguarding concern regardless of whether an image appears real, and must not download, copy, forward or ask a child to send an image.

Theatretrain believes that abuse is abuse and it will never be tolerated, dismissed or minimised.

Children who have experienced child-on-child abuse will be supported by:

- Offering them an immediate opportunity to discuss the experience with a member of staff and volunteers of their choice.
- Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
- Providing reassurance and continuous support
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Children who are alleged to have abused other children will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change.
- Informing parents/carers to help change the attitude and behaviour of the young person.
- Providing appropriate education and support
- Sanctioning them in line with organisation outcomes. This includes official warnings, exclusion from activities, removal of privileges (including denial of online access), fixed-term and permanent exclusions.
- Speaking with police or other local services (such as early help or children's specialist services) as appropriate

Theatretrain is aware of and will follow the local safeguarding children's partnership procedures for supporting children who are at risk of harm as a result

of their own behaviour.

18. Safeguarding children with special educational needs and disabilities

Theatretrain acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Theatretrain will ensure that children with SEN and disabilities, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

Members of staff and volunteers are encouraged to be aware that children with SEN and disabilities can be disproportionally impacted by safeguarding concerns such as bullying.

All members of staff and volunteers will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

19. Service users - staying safe

We recognise that Theatretrain plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Theatretrain will provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that children have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others, including online.

Procedures have been established to support the empowerment of children to talk to a range of staff and volunteers. Children at Theatretrain will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

20. Online safety

It is recognised by Theatretrain that the use of technology presents particular challenges and risks to children and adults both inside and outside of Theatretrain.

Theatretrain identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:

- **content**: being exposed to illegal, inappropriate, or harmful material.
- **contact**: being subjected to harmful online interaction with other users.
- **conduc**t: personal online behaviour that increases the likelihood of, or causes, harm.

The DSL and all staff must follow the DfE and UKCIS guidance, "Sharing nudes and semi-nudes: advice for education settings working with children and young people." This includes AI-generated, deepfake, manipulated or otherwise digitally altered images. An image need not be genuine for the incident to be a safeguarding concern, and its creation or sharing may engage criminal law. Staff must not ask a child to send or show an image, or download, copy, store or forward it. If an image is received or shown, staff must not circulate it; they should record relevant details without copying the image, report the incident to the DSL without delay, and follow current national guidance and local referral procedures.

21. Provision of services to other organisations (i.e. schools)

Where services or activities are provided to another organisation by Theatretrain's staff and volunteer teams, the DSL will seek written clarification through Service Level Agreements as to the Safeguarding arrangements that will be in place. Should the safeguarding arrangements follow the external organisations policies/procedures – agreements will be made concerning Theatretrain's staff and volunteers having access to appropriate policies and procedures regarding safeguarding children and child protection and that a relevant overview/induction has been undertaken covering the specific safeguarding processes within the external organisation.

If this assurance is not achieved, then Theatretrain has the right to remove services to the organisation.

21. Security

All members of staff and volunteers have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-organisation community ethos and welcome comments from children, parents and others about areas that may need improvement as well as what we are doing well.

Theatretrain will not accept the behaviour of any individual (parent or other) that threatens the organisation security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to Theatretrain service provision.

Appendix 1: Responsibilities of the Franchisee and Franchisor

The Franchisor has the responsibility to ensure:

There is a named Designated Safeguarding Lead (DSL), who is the Company Director and who has undertaken approved LSCP training in inter-agency working, in addition to basic child protection training.

Theatretrain has an up-to-date child protection policy which is consistent with LSCP requirements, reviewed annually and made available to parents on request.

Procedures are in place for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the manager/franchisee.

Safer recruitment procedures, which include the requirement for appropriate checks in line with national guidance are in place.

There is an up-to-date and appropriate training strategy which ensures all members of staff and volunteers, including the managers, staff and volunteers, receive safeguarding training.

That all staff and volunteers are made aware of Theatretrain's arrangements for safeguarding.

The Company Director has the responsibility to ensure:

That the child protection policy and procedures are implemented and followed by all staff and volunteers.

That sufficient time and resources are allocated to enable the DSL (and any appropriately trained deputies) to carry out their roles effectively, including the assessment of children and the attendance at strategy discussions and other necessary meetings.

That all members of staff and volunteers feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with Theatretrain's whistle blowing procedures.

Children's safety and welfare is addressed throughout all of the services provided across Theatretrain.

Appendix 2: Categories of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse:

- Sudden changes in behaviour and organisation performance.
- Displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation or attempts at suicide.
- Alluding to secrets which they cannot reveal.
- Tendency to cling or need constant reassurance.
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby.
- Distrust of familiar adults e.g. anxiety of being left with relatives, a child minder or lodger.
- Unexplained gifts or money.
- Depression and withdrawal.
- Fear of undressing for PE.
- Sexually transmitted disease.
- Fire setting.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse:

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso.
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns.
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse:

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted.
- Unwillingness or inability to play.
- Excessive need for approval, attention, and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at Organisation
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 3: Specific Safeguarding Issues

Child Sexual Exploitation (CSE)

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

Theatretrain is aware that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation may involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, making or sharing nudes and semi-nudes, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse or recognise this as abusive.

Every member of staff and volunteers at Theatretrain recognises that children at risk of CSE need to be identified and issues relating to CSE should be approached in the same way as protecting children from other risks.

'Honour based' abuse
Members of staff and volunteers at Theatretrain are aware that 'Honour-based' violence (HBV) encompasses a range of crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

The indicators of HBV and associated factors will be covered with staff and volunteers within Theatretrain safeguarding training. All members of staff and volunteers are alert to the possibility of a child being at risk of HBV, or already having suffered HBV. All members of staff and volunteers are aware that all forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff and volunteers will speak with DSL if they are concerned about HBV.

All members of staff and volunteers will follow Theatretrain and LSCP procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Forced Marriage

The Forced Marriage Unit has published Multi-agency guidelines (Feb 2023), with pages 45 to 48 focusing on General Action to be take in all cases, and pages 79-85 focusing on Schools, Colleges and Universities.

Staff and volunteers should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk

Radicalisation

Theatretrain recognises that exposure of children (and adults) to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation.

Theatretrain will ensure the DSL team complete an e-learning training package developed by the Home Office which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process.

Every member of staff and volunteer at Theatretrain recognises that children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks. All members of the community at Theatretrain will report concerns regarding radicalisation and extremism to the DSL who will follow local and national guidance.

Additional information about responding to online radicalisation and extremism can be found in Theatretrain's online safety policy.

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Gangs and Youth Violence

The involvement of young people in Serious Youth Violence – including drug distribution – has links to organised crime and other risk areas, for example child sexual exploitation and going missing. Young people involved in Serious Youth Violence are often vulnerable individuals who may be drawn into organised crime and can be both perpetrators and victims of harm.

There are many definitions of what constitutes a gang, for purposes of this policy they will be defined as:

Organised Criminal Group (OCG) or Criminal Gangs: Individuals, normally working with others, with the intent and capability to commit serious crime on a continuous basis, which includes elements of: planning / control / coordination / structure / group decision- making.

Street Gangs: A relatively durable predominantly street-based groups of young people who see themselves (and are seen by others) as a discernible group and engage in a

range of criminal activity and violence. They may also have any or all of the following features:

- Identify with or lay claim over territory.
- Have some form of identifying structural feature.
- Are in conflict with other, similar, gangs.

Domestic abuse
The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Appendix 4: Keeping yourself safe when responding to disclosures.
The 6 R's – what to do if…

1. Receive

- Keep calm.
- Listen to what is being said without displaying shock or disbelief.
- Take what is being said to you seriously.
- Note down what has been said.

2. Respond

- Reassure the child that they have done the right thing in talking to you.
- Be honest and do not make promises you cannot keep e.g. "It will be alright now."
- Do not promise confidentiality; you have a duty to refer.
- Reassure and alleviate guilt, if the child refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know.

3. React

- React to the child only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details.
- Do not ask leading questions; "Did he/she….?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell, explain, describe.
- Do not criticise the perpetrator; the child may have affection for him/her.
- Do not ask the child to repeat it all for another member of staff and volunteers.
- Explain what you must do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible.
- Do not destroy your original notes.
- Record the date, time, place, any non-verbal behaviour, and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions (please ensure Theatretrain's templates are used).

5. Remember

- Contact the designated safeguarding lead (DSL).
- The DSL may be required to make appropriate records available to other agencies in line with the Local Safeguarding Children's Partnership procedures (see page 1).

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals.

Appendix 5: National Support Organisations

Support for Staff and Volunteers

- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Children

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: https://www.mosac.net/
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour Based Violence

- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Zone: https://parentzone.org.uk/
- Internet Matters: www.internetmatters.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk