

# **FRANTIC ASSEMBLY**

## **Safeguarding Policy & Procedure May 2021**

### **Policy Overview**

As world leaders in devised and collaborative theatre, Frantic Assembly are committed to providing safe participatory and creative activities for children and young people and vulnerable adults, through its programme of physical theatre workshops, residencies, talks and performance opportunities.

In line with the Children Act 1989 and 2004 and the United Nations Convention on the Rights of the Child 1992, Frantic Assembly ensure that the safety and welfare of young people and vulnerable adults are paramount. We believe all young people and vulnerable adults, whatever their age, race, ethnic origin, nationality, language, culture, religious beliefs, social class, disability, gender, and/or sexual identity/orientation have a right to protection from abuse and the company is committed to protecting young people and vulnerable adults from harm.

Frantic Assembly has a duty of care to safeguard all children, young people and vulnerable adults, recognising the possible risks within the organisation and its practices and by developing awareness of the issues which could cause harm. In order to achieve this objective Frantic Assembly has developed a policy and set of procedures to be followed by all individuals, whether they are directly employed by the company, employed as freelancers on behalf of the company, or are volunteers.

Frantic Assembly also recognises that practitioners of physical disciplines are vulnerable to accusations of contact that may be deemed "inappropriate"; therefore, it is in everyone's interest that the company clearly outlines to its representatives a set of guidelines and practices to adhere to, which can be found in the Safeguarding Procedure.

The aim of Frantic Assembly's Safeguarding Policy and Procedure is to promote good practice by providing young people and vulnerable adults with appropriate safety and protection whilst participating in Frantic Assembly's activities. The procedures outlined will allow all staff and volunteers to make informed and confident responses to specific child protection and safeguarding issues.

## Safeguarding Procedure May 2019

**Any queries relating to this document should be addressed to:**  
Designated Safeguarding Officer: Marilyn Rice  
[marilyn@franticassembly.co.uk](mailto:marilyn@franticassembly.co.uk)

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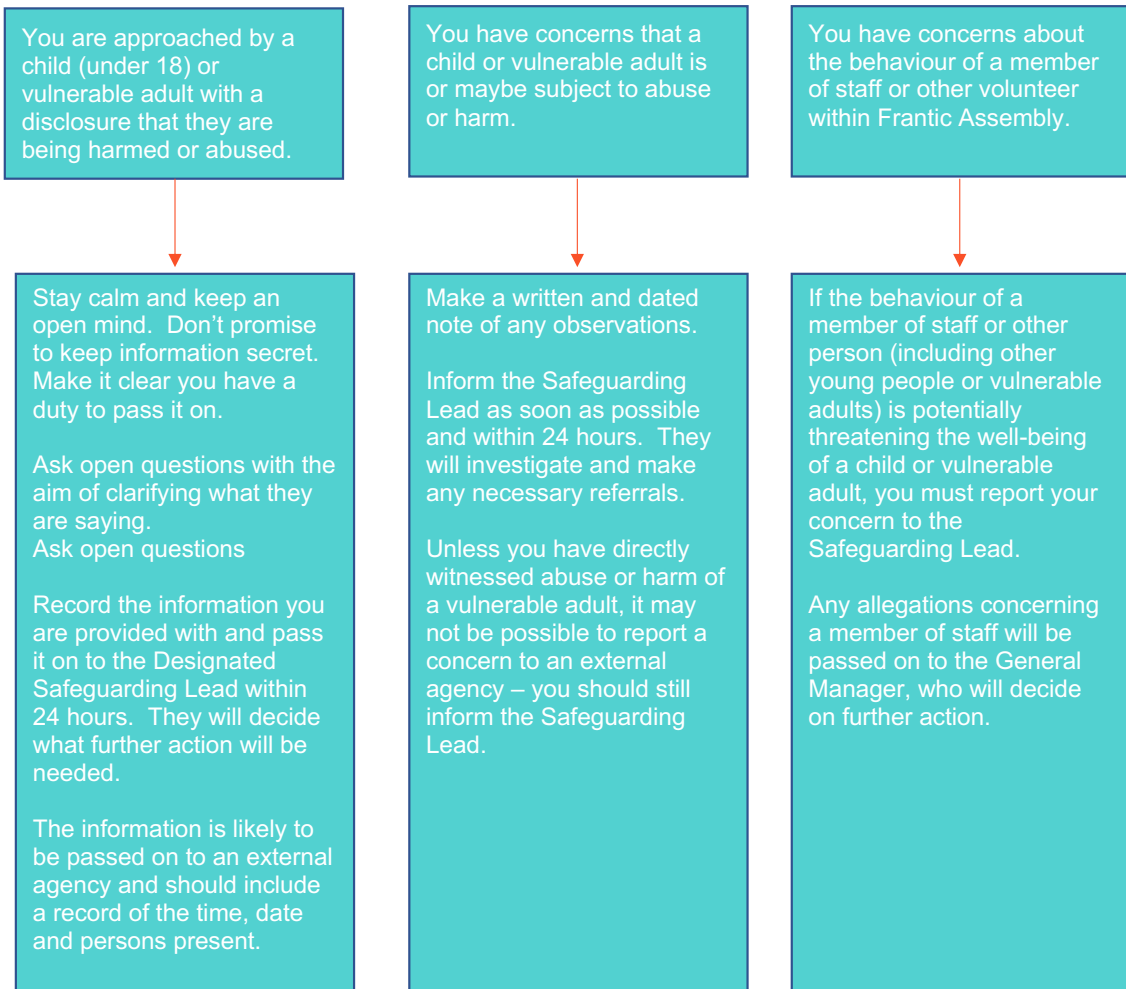
## Safeguarding: Quick Reference for Disclosures & Concerns

Quick reference guide to handling concerns about safeguarding of children or vulnerable adults.

**Is the person in immediate danger?**  
 Contact the Police Public Protection Unit 020 7601 2941 (or 999 in an emergency). If you are unsure, speak to the Designated Safeguarding Officer (DSO) at Frantic Assembly, or for external workshops, the school.

If you cannot reach the Designated Safeguarding Officer and need immediate guidance, the NSPCC Helpline is 0808 800 5000.

Designated Safeguarding Officer: Marilyn Rice, 020 7841 3115, [marilyn@franticassembly.co.uk](mailto:marilyn@franticassembly.co.uk)



**ALWAYS NOTIFY THE SAFEGUARDING OFFICER WITHIN 24 HOURS OF ANY INCIDENT OR CONCERNS**

## INDICATORS OF ABUSE:

Indicators of abuse might include:

### Inappropriate sexual knowledge

Distrusting adults where a close relationship would normally be seen, for example uncles and aunts, or brothers and sisters.

Engaging in sexually explicit behaviour.

Possible difficulty making friends.

Eating patterns may vary, including overeating or loss of appetite.

Losing weight suddenly or unexpectedly.

Becoming increasingly dirty or unkempt.

Unexplained or suspicious injuries, such as bruising, cuts or burns, especially if they are on parts of the body not usually prone to injury.

Fingertip bruising.

An injury where the explanation seems inconsistent.

A young person describing what appears to be abuse involving them.

Another young person or adult showing concern about the welfare of another child.

Unexplained changes in behaviour; becoming very quiet / outbursts of anger etc.

It is important to note that this list only highlights some of the common indicators of abuse and that there are many more. The indicators above can also be present but may not mean that abuse is taking place. It is not your responsibility to judge whether abuse is taking place, but it is our responsibility to act and report on any suspicions or concerns that we may have.

Use the incident report form (appendix C) to make a note of what you have witnessed, and any action taken.

If dealing with young people, you can report a concern without any direct evidence.

If you have a concern about a vulnerable adult, you must report that concern to the DSO as soon as possible.

Unless you directly witness harm or abuse you are not permitted to report your concern to an authority but should still inform Frantic Assembly's Designated Safeguarding Officer.

## 2. SAFEGUARDING CODE OF CONDUCT:

### 2.1 Good Practice

- A teacher or member of staff from the Host organisation should always be present – a practitioner’s presence should always enhance, not replace.
- All representatives of Frantic Assembly should demonstrate behaviour that promotes the welfare of all participants.
- Practitioners should always consider individual needs of each participant and seek background information provided by Host organisations or by Frantic Assembly, in order to enable all participants to fully engage with the workshop; especially those with additional needs.
- Practitioners must plan activities to ensure the whole group can participate.
- Frantic representatives must be excellent role models – including not smoking or being under the influence of alcohol in the company of participants (e.g. not on school premises or when responsible for a group of young people).
- Using appropriate and professional language.
- Always working in an open environment, always avoiding private or unobserved situations and encouraging open communication.
- Treating all participants equally, with respect and dignity.
- Being aware and respectful of participants from different faiths and cultures.
- Building balanced relationships based on mutual trust which empowers participants.
- Always putting the welfare of each participant first, before winning or achieving goals.
- Making activities fun, enjoyable and fair.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Maintaining a safe and appropriate distance with participants (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a young person or vulnerable adult).
- Due to the physical nature of Frantic Assembly’s educational workshops, at the start of each session the practitioner should always remind participants that there will be contact-based activities. This prepares the participants, giving them the option of whether they are comfortable taking part.

- If any physical contact/support is required by the practitioners, it should be provided openly and with explanation.
- If you need to get changed before or after an activity, ask a host staff member to direct you to a staff only changing area or bathroom.
- If you require any training in safeguarding, you should contact the DSO for a training session to be arranged.

## 2.2 Practices to be avoided

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in charge, such as a schoolteacher or the young person or vulnerable adult's parents/carer:

- Avoid spending time alone with young people or vulnerable adults away from others. A member of staff from the Host organisation or Frantic Assembly should always be present during workshops and activities.
- Avoid taking or dropping off a young person or vulnerable adult to an event or activity.
- Do not administer first aid to young people. There should always be a member of the host organisation present to take responsibility for incidents requiring first aid.
- Avoid taking on the responsibility for tasks for which you are not appropriately trained, for example physically handling disabled participants.
- Do not promise to keep secrets for a participant as this may be at the detriment of their welfare.
- Do not give personal contact details to a participant (e.g. personal mobile phone number/Facebook profile)
- Do not use physical intervention to manage challenging behaviour (see section 5.5 for further details)

## 2.3 Practices never to be sanctioned:

- Physical punishment or the threat of such
- Refusal to speak to or interact with the participant.
- Depriving participants of food, water, access to changing facilities or toilets or other essential facilities.

- Verbal intimidation, ridicule or humiliation, or reducing a participant to tears as a form of control.
- Engaging in rough or sexually provocative games.
- Allowing or engaging in any form of inappropriate touching.
- Allowing participants to use inappropriate language unchallenged.
- Making sexually suggestive comments to a participant.
- Failing to act upon and record any concerns raised by a participant.
- Doing things of a personal nature for young people or vulnerable adults that they can do for themselves.
- Inviting or allowing participants to stay with you at your home unsupervised.

N.B. Please be aware that due to some of the content and language in Frantic Assembly's productions, young people participating in activities with the company may challenge some of the above guidelines. In these instances, Frantic Assembly's representatives should clearly and firmly explain that such behaviour is inappropriate in an educational setting and will not be tolerated.

## 2.4 Managing challenging behaviour

When working with young people or vulnerable adults you may, on occasions, be required to deal with challenging behaviour, such as:

- bullying
- violence towards others
- bad language
- discrimination
- venturing outside boundaries on purpose
- abuse of facilities or equipment
- disobeying staff / volunteers
- deliberately making a situation unsafe.



In responding to challenging behaviour your reaction should always be consistent, proportionate to the actions, be imposed as soon as is practical and be fully explained to the participants and their teachers/parents/carers.

When delivering activities at a Host organisation, if faced with young people or vulnerable adults who display negative or challenging behaviours you should follow these guidelines:

- Immediately state to the participant that this behaviour cannot be tolerated in a workshop.
- Explain to the main contact / staff member representing Host what has happened and request that they manage the situation, as behaviour management is their responsibility.

### 3. PROMOTING GOOD PRACTICE

#### 3.1 Good practice means:

- Frantic Assembly will insist that at least one member of staff from the Host organisation is present throughout all activities involving young people. If an activity is being hosted by Frantic Assembly, at least two company representatives must be present at all times. We will follow NSPCC guidelines for supervision on 1 adult to 10 young people aged 13-18.
- When working with vulnerable adults, Frantic Assembly will work with the Host organisation to agree the level of staff supervision and support that will be needed for the particular group of vulnerable adult participants and ensuring this level is available.
- If the Host member of staff leaves you in the room alone with young people or vulnerable adults, follow them and explain that you are not able to remain in the room without a member of the Host staff.
- For Frantic Assembly hosted activities, the DSO will work with the practitioner to identify potential risks and agree strategies to manage those risks in advance. Or, at a Host organisation, the main contact will be responsible for sharing risk assessments with the practitioner.
- For unaccompanied young people or vulnerable adults travelling to Frantic Assembly hosted activities the DSO will ensure parental / carer consent is given in advance, up to date contact information is given to both participant and parent/carer and Frantic Assembly, Frantic Assembly have emergency contact details for the participant and clear directions and meeting points are provided.

- When young people or vulnerable adults have been identified as having additional needs or behaviours that are likely to require additional supervision, specialist expertise or support, the DSO will discuss this with main contact (if at a Host organisation) or with the parent / carer (at Frantic Assembly hosted activity) and where appropriate the participant, to ensure they can be supported to participate safely.

## 3.2 Online Safeguarding

### REMOTE WORKING WITH CHILDREN AND YOUNG PEOPLE

There are times (eg: during social distancing) when Frantic staff and Practitioners will be working from home and may be working with participants digitally. This section provides the guidelines for Frantic staff and organisations we work with to keep themselves and the participants they work with safe.

### WORKING AND DELIVERING ONLINE LEARNING FROM HOME

When working from home Practitioners and office staff will have their own accounts to access emails and a log-in to access files.

- No participant details or images will be downloaded or saved on computers (unless it is a computer provided for work use only).
- Staff will not share their accounts or logins with other external organisations
- If participant images need to be downloaded for photo or video editing, then they will be deleted once the edit has taken place and the edited film is uploaded to the charity's server.
- Artists who need access to creative content including videos are given links which enable them to watch videos online but not download.
- Staff will always lock computer or close documents with sensitive information when they are away from their laptops / computers.

### COMMUNICATION VIA TELEPHONE

Communication by telephone will be made directly with teachers and hosts but Practitioner's telephone numbers are not to be given to participants

## **COMMUNICATION VIA DIGITAL PLATFORMS**

When communicating with educational organisations and youth groups through digital platforms Frantic staff and Practitioners will only use official accounts provided by the school or educational establishment and all parties will ensure that the personal contact details of the participants and Practitioners are not shared.

Teachers/group leaders, Frantic staff and Practitioners will be the only adults present in digital platform sessions.

All schools engaging in Frantic online workshops will inform parents of the platforms to be used and the dates and times of the workshops and the adults who will be in these platforms.

Frantic Assembly will operate through the online means that the school or organisation currently use and enter as a guest in this space.

Hosts will set clear rules of engagement with participants when working on digital platforms. These rules will be in line with the rules of their school or organisation when working in person.

Hosts will also remind participants that this is not a private space and whatever they share online will be seen by the group.

Any participant who breaks the above rules will be removed from the platform by staff and parents/carers will be informed.

## **RECEIVING A DISCLOSURE ONLINE**

If a Frantic Assembly Practitioner receives a disclosure online they must refer it directly to the DSO who will follow the internal reporting procedure. The DSO will follow the procedure below. If the Practitioners cannot get hold of the DSO, or a more senior member of staff, they should also follow the procedure set out in this document.

They must make sure they fill out the safeguarding report form and return this to the DSO within 24 hours

## **SHARING WORK CREATED ONLINE**

When sharing work created online Frantic Assembly will take the following steps:

- Share the final edits with the hosts and participants before it is shared.

- No use of full names if participants are under 18 in photography or video content.
- Ensure hosts have gained parental/guardian consent for their child to be photographed and videoed.
- Only use images of participants in suitable clothing to reduce the risk of inappropriate use.
- Only share content through official accounts.

If, for whatever reason, a parent/carer or participant is not happy with the use of content, then the company will not share the content.

Please refer to Appendix G: Guidance for the use of Images of Children and Young People.

### 3.3 Incidents that must be reported/recorded

If any of the following occur, you should report this immediately to the appropriate officer and record the incident (see 4.4). The DSO will liaise with you and Host organisation to ensure that the parents of the young person are informed, unless this puts the young person in danger:

- If you accidentally hurt a participant.
- If a participant seems distressed in any manner.
- If a participant appears to be behaving inappropriately or makes you feel uncomfortable.
- If a participant misunderstands or misinterprets something you have done and demonstrates distress as a result.
- If a participant discloses anything to you that causes concern.
- If physical intervention is required to manage challenging behaviour.

### 3.4 Physical Intervention

If delivering Frantic Assembly activities at a Host organisation the overall responsibility for behavioural management lies with the Host. Every organisation has its own procedures for managing challenging behaviour and

therefore it is essential that you **do not** use any form of physical intervention at any time.

However, at a Frantic Assembly hosted activity the company has responsibility for the safety of young people or vulnerable adults in our care at that time. In this instance physical intervention should be avoided unless it is absolutely necessary to prevent someone from injuring themselves or others or causing serious damage to property (such as arson). All forms of physical intervention should form part of a broader approach to the management of challenging behaviour. You should never intervene if there is a risk of physical harm to yourself – your responsibility is to take yourself and the rest of the group out of harms way.

Physical contact to prevent something happening should always be the result of conscious decision-making and not a reaction. Before physically intervening, the member of staff or volunteer should ask themselves, 'Is this the only option in order to manage the situation and ensure safety?' It is good practice to ensure that if you have to physically intervene in a situation with a participant, it is in the least restrictive way necessary to prevent them from getting hurt and used only after all other strategies have been exhausted. Studies have shown that, where this is the case, children and young people understand and accept the reasons for the intervention.

Where young people or vulnerable adults have been identified as having additional needs or behaviours that are likely to require physical intervention the DSO will discuss this with parents / carers in advance and where necessary seek advice from NSPCC to ensure that a participant can be supported to take part in the activity safely. This may include employing a suitably trained support worker or accessing training in physical intervention.

The following must always be considered:

- Physical intervention is a last resort and should be only occur if absolutely necessary to prevent a participant from harm.
- Physical intervention should NOT involve inflicting pain on a participant, but rather to restrain and protect them.
- All forms of physical intervention should employ only a reasonable amount of force, i.e. the minimum force needed to avert injury to a person or serious damage to property -applied for the shortest period of time.
- Staff/volunteers should consider the circumstances, the risks associated with employing physical intervention compared with the risks of not employing physical intervention.

- Staff/volunteers should never employ physical interventions which are deemed to present an unreasonable risk to participants or staff/volunteers.
- Staff/volunteers shall never use physical intervention as a form of punishment.
- Contact should be avoided with buttocks, genitals and breasts.
- Any physical intervention used should be recorded as soon as possible after the incident by the staff/volunteers involved using the Incident Report Form and passed to the DSO immediately.

A timely debrief for staff / volunteers, the participant and parent / carer should always take place following an incident where physical intervention has been used. This should include ensuring that the physical and emotional well-being of those involved has been addressed and ongoing support offered where necessary. All involved should be given an opportunity to talk about what happened in a calm and safe environment. There should also be a discussion with the participants and parents about their needs and continued safe participation in the group or activity.

## 4. TAKING ACTION AGAINST ABUSE

Abuse can occur within many situations including the home, school and creative or educational environments. There may be instances when Frantic Assembly's employees, representatives or volunteers have regular contact with young people or vulnerable adults, and this could make them an important link in identifying cases where they need protection. There may also be occasions when a member of Frantic Assembly is a witness to abuse or bullying, or when a young person or vulnerable adult discloses such information to them (see Appendix A). All suspicious cases of poor practice should be reported following the procedures set out below.

As an artist or arts organisation working directly with young people or vulnerable adults, there should always be a named contact with legal responsibility for participants under age 18 or vulnerable adults (usually a school teacher, carer or youth worker at a Host organisation, or an emergency contact if during an activity hosted by Frantic Assembly). You should never assume sole responsibility for a young person or a vulnerable adult.

### 4.1 If a young person or vulnerable adult discloses information to you

It is possible that a young person or vulnerable adult, who is suffering or has suffered from abuse will confide in you. This is something that you should be prepared for and must handle carefully. The following action should be taken in this instance:

1. Remain calm and in control – don't panic.
2. Listen carefully to what is being said – you need to remember as much as you can.
3. Find an appropriate, early opportunity to explain you will need to share information with others - do not promise to keep secrets.
4. Don't give your own view or opinions – or ask leading questions. Ask open questions to clarify what they are saying to you.
5. Say what you will do next and who you will share information with
6. Make a record immediately afterwards (see appendix C) then follow procedures in 4.3.

## 4.2 If you suspect a young person is being abused

If you see or suspect abuse of a young person (whether by other young people or an adult) you should make the person with legal responsibility for that young person aware of the problem.

If you are working at a Host organisation this will be the named contact. If you are at a Frantic Assembly hosted activity speak to the DSO who will immediately speak to the emergency contact of that young person. However, if you suspect that the person with legal responsibility is actually the source of the problem you should make your concerns known to another senior member of staff at that organisation, as well as informing the DSO.

### 4.3.i What to do if you have a concern about a young person

A concern is something you have noticed / have witnessed / comment overheard that makes you feel uncomfortable.

#### Early help matters

Be aware of the need for help for a child who:

- Is disabled or has a specific need
- Is a young carer
- Has challenging family circumstances
- Is at risk of FGM
- Has returned home from care
- Is frequently missing
- Is at risk of radicalisation

- Has experience of drug abuse (them or their family)
- Is at risk of modern slavery / trafficking

Indicators of abuse might include:

**Inappropriate sexual knowledge**

Distrusting adults where a close relationship would normally be seen, for example uncles and aunts, or brothers and sisters.

Engaging in sexually explicit behaviour.

Possible difficulty making friends.

Eating patterns may vary, including overeating or loss of appetite.

Losing weight suddenly or unexpectedly.

Becoming increasingly dirty or unkempt.

Unexplained or suspicious injuries, such as bruising, cuts or burns, especially if they are on parts of the body not usually prone to injury.

Fingertip bruising.

An injury where the explanation seems inconsistent.

A young person describing what appears to be abuse involving them.

Another young person or adult showing concern about the welfare of another child.

Unexplained changes in behaviour; becoming very quiet / outbursts of anger etc.

It is important to note that this list only highlights some of the common indicators of abuse and that there are many more. The indicators above can also be present but may not mean that abuse is taking place. It is not your responsibility to judge whether abuse is taking place, but it is our responsibility to act and report on any suspicions or concerns that we may have.

Use the incident report form (appendix C) to make a note of what you have witnessed, and any action taken.

If dealing with young people, you can report a concern without any direct evidence.

**4.3.ii What to do if you have a concern about a vulnerable adult**

If you have a concern about a vulnerable adult, you must report that concern to the DSO as soon as possible.

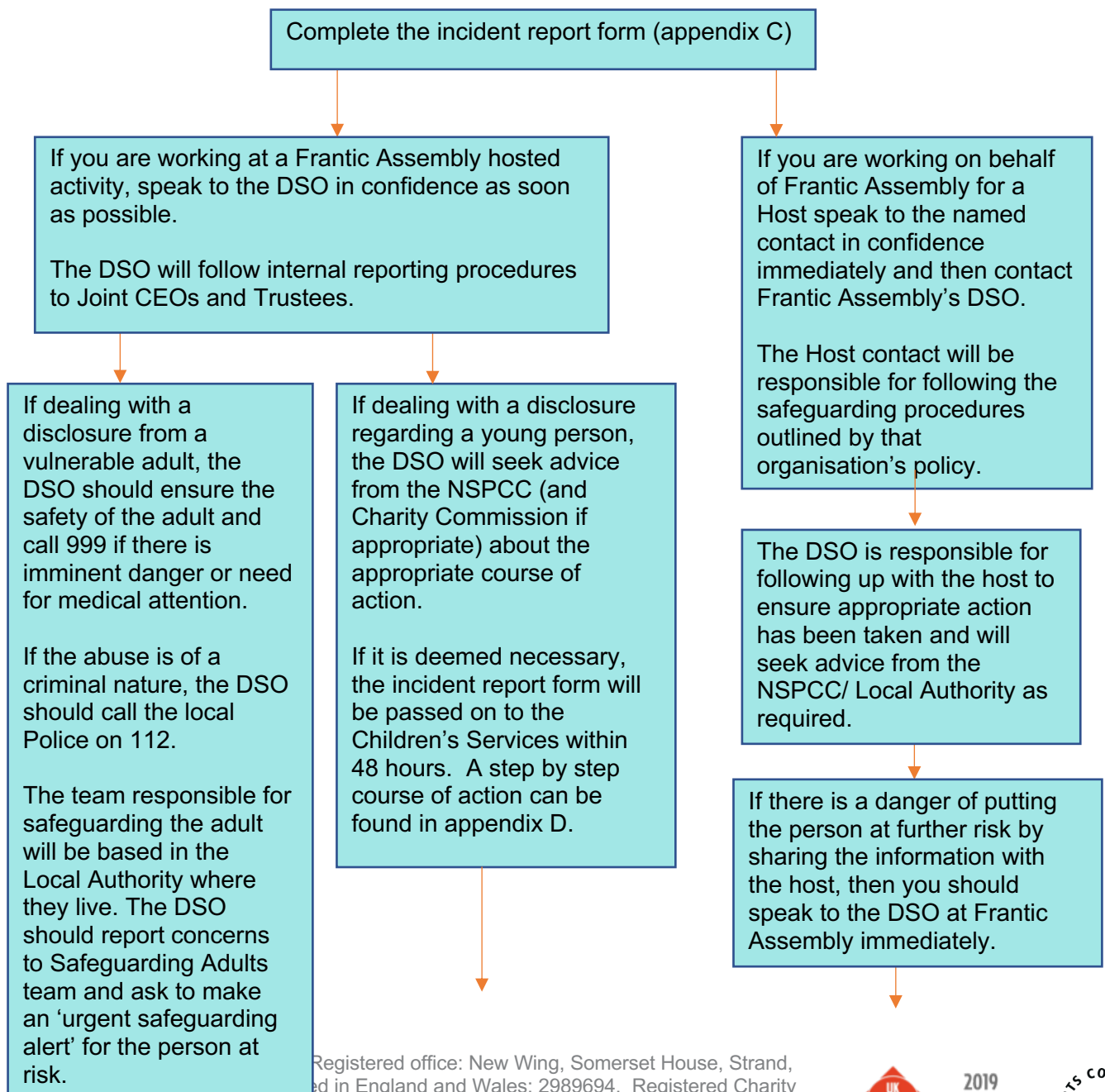


Unless you directly witness harm or abuse you are not permitted to report your concern to an authority but should still inform Frantic Assembly's Designated Safeguarding Officer.

## 4.4 How to report an incident

Frantic Assembly commits to all staff, freelancers and volunteers that they will be fully supported if disclosing concerns about abuse in good faith. It is never wrong to report a concern, so long as it is in good faith.

If you have a concern relating to FGM, reporting that concern is mandatory. The NSPCC FGM Helpline number can be found in Appendix I.



If the young person is in immediate danger or feels unsafe to leave your premises, inform the police or social services.

## 4.5 Standard Procedure

If a child or vulnerable adult discloses risky behaviour:

- Receive it and believe it.
- Listen, take them seriously, keep an open mind.
- Reassure them that they have done the right thing and be honest about likely outcomes.
- React in a calm, professional way – ask open questions, no criticism or judgement
- Explain the next steps
- Record – make brief notes immediately, record words used by the person disclosing, be impartial.
- Keep record safe – use initials for names for confidentiality

Remember to:

- Make sure the person disclosing knows that you can't keep this a secret.
- Make sure you use language they understand.
- Be honest about the outcomes
- You can't keep someone in the team if there is potential danger
- Must inform any team members about allegations against them ASAP but it is not necessary to tell them what the allegation is.
- Start the process for them, recording and passing on the following information:

Name of child / vulnerable adult:	
DOB:	
Disability:	
Parent / Carer Name:	
Address:	
Your name:	
Who reported to whom:	
Date of report:	
Signature	
Today's date:	

## 4.6 Allegations made against Frantic Assembly staff

It is highly advisable to follow the good practice guidelines, as set out in section 2, at all times to avoid allegations of abuse. All allegations or concerns should be directed to the DSO or Executive Director who will liaise with NSPCC for advice and work

together to follow the procedures in this policy, making a report to the Charity Commission for any serious incidents.

If the allegation made against a member of staff or a volunteer meets any of the following criteria Frantic Assembly will consider that a serious incident and contact the Local Authority Designated Officer (LADO) and Charity Commission:

- Behaved in a way that has harmed or may harm a participant.
- Possibly committed a criminal offence against, or related to a participant
- Behaved towards a participant in a way that indicates they are unsuitable to work with young people or vulnerable adults.

The LADO is responsible for:

- Providing advice and liaison
- Monitoring the progress of each case
- Ensuring that cases are dealt with as quickly as possible
- Ensuring the process is fair and thorough

Frantic Assembly will never delay reporting an incident on the grounds that all the facts need to be established; we will report early and incompletely if necessary to put the Charity Commission on notice to ensure the company is following the correct procedures.

The LADO will also advise Frantic Assembly on what, if anything, may be shared with the person who is subject to an allegation. They should decide, in consultation with the police or other relevant agencies, what may be shared in situations that may possibly lead to a criminal investigation.

Where there is a complaint against a member of staff there may be up to three types of investigation, dependent on the nature of the concern:

- A criminal investigation by the police
- A child protection investigation by Children's Services
- A disciplinary or misconduct investigation by Frantic Assembly

The results of the police and child protection investigation may well influence and inform the disciplinary investigation, but all available information will be used to reach a decision.

A step-by-step course of action is set out in appendix E.

#### 4.7 Confidentiality

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will not be shared without consent, except where required to do so by law or by court order, or where it is in the public interest to do so, for example in cases of suspected child abuse.

Advice from NSPCC, Children's Services and the LADO will be followed carefully to ensure information is not shared unless completely necessary.

Information will be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

#### 4.8 Record retention periods

In line with guidance according to the latest changes in the law regarding GDPR, personal information should not normally be held for longer than 6 years after the subject's last contact with the authority. Exceptions to the 6-year period will occur when records:

- Need to be retained because the information in them is relevant to legal action that has been started.
- Are required to be kept longer by law.
- Are archived for historical purposes (e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority). Where there are legal proceedings it is best to seek legal advice about the retention period of your records.
- Consist of a sample of records maintained for the purposes of research.
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
- Are held in order to provide, for the subject, aspects of their personal history (eg: where the participant might seek access to the file at a later date and the information would not be available elsewhere).

When records are being kept for more than the 6-year period files need to be clearly marked and the reasons for the extension period clearly identified.

If an allegation is made against a Frantic Assembly employee or volunteer a record will be kept until the person reaches normal retirement age, or for 10 years if that is longer. Such records will contain details of how the allegations were followed up and resolved, and of any action taken and decisions reached.

These records will be kept in a confidential personnel file and a copy should be given to the individual whom the allegation is against.

Appendix G outlines NSPCC guidance on retention periods, storage of records and destruction of records.

## 4.9 Obtaining Information from Young People / Vulnerable Adults

Frantic Assembly will only collect information from young people or vulnerable adults according to the current GDPR laws:

- If a young person is under 16, parental permission is needed to retain any data.
- If working with vulnerable adults, carer permission is needed to retain any data.
- Taking information from under 13s is prohibited so the company would only request permission or personal information from a parent/legal guardian, in the event of running any activities for children of that age.
- Frantic Assembly may collect opinion and experience of an event from young people or vulnerable adults, but this information would be anonymised before being used for any publicity materials.
- Any personal data will be stored securely and for the correct length of time according to Frantic Assembly's Data Protection Policy.

## 4.10 Whistleblowing

The [NSPCC Whistleblowing Advice Line](#) is for anyone with child protection concerns in the workplace. The helpline provides support and advice to those who feel unable to get a child protection issue addressed by their employer. It can be contacted anonymously on [0800 028 0285](tel:0800 028 0285).

For internal issues, see Frantic Assembly's Whistleblowing policy.

## 5 RECRUITMENT, RESPONSIBILITY AND DISSEMINATION

Frantic Assembly recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children. The same procedures will be adopted for all staff, whether paid or voluntary, that will have contact with young people whilst representing Frantic Assembly.

### 5.1 Pre-selection checks

Frantic Assembly's stance on safeguarding should be clear in information provided to applicants and new staff. All volunteers/staff should submit the following information before commencing work with the company:

- Name, address and National Insurance number.
- Relevant experience, qualifications and training undertaken.
- Details of previous employment.
- Names of at least two people (not relatives) willing to provide references.
- Consent to a Disclosure and Barring Service Check being undertaken if relevant to their post.

## **5.2 Interview and Induction**

Frantic Assembly will always aim to carry out an interview when employing new staff or volunteers. In exceptional cases where interviews are not possible or relevant (for example when a performer is hired through an audition process), thorough checks and references should be carried out. If any doubts or concerns are noted during the checks and references a formal interview should be arranged to raise these issues.

All employees, representatives and volunteers should receive a full induction, during which:

- All personal information given during pre-selection is checked.
- The job requirements and responsibilities should be clarified.
- Child protection policy and procedures are explained
- Any training needs are identified.

## **5.3 References**

If applying for a position that will involve working with young people or vulnerable adults, a minimum of two references should be taken up and at least one should speak of the applicant's ability to work with young people or vulnerable adults. If an applicant has no experience of working with these participants, training is strongly recommended.

## **5.4 Self-disclosure & employment of ex-offenders**

In line with the provisions of the Rehabilitation of Offenders Act (UK wide) (1974) (Exceptions) (Amendments) Order 1986 (UK wide) it is a legal requirement that

adults intending to work with young people should declare all convictions, including spent convictions. Frantic Assembly requires applicants for posts involving contact with young people to complete a self-disclosure form (see appendix B). Having a criminal record will not necessarily bar an applicant from working with the company, but this will depend on the nature of the position and the circumstances and background of any offences.

## 5.5 Disclosure and Barring Service Checks

The Disclosure and Barring Service helps employers make safer recruitment decisions each year by processing and issuing DBS checks for England, Wales, the Channel Islands and the Isle of Man. DBS also maintains the adults' and children's Barred Lists and makes considered decisions as to whether an individual should be included on one or both of these lists and barred from engaging in regulated activity.

In accordance with the Protection of Children Act 1999, Frantic Assembly is required by law to check all company representatives that will work with young people in Regulated Activity under the age of 18 for history of a criminal record. The majority of our work with young people is not regulated activity, and therefore does not require a DBS check. However all practitioners will undergo DBS checks for the occasional regulated activity that the company delivers.

The Practitioner's consent is required for the company to fulfil this obligation and it is the practitioner that must submit their details to the Disclosure and Barring Service every two years. For regular practitioners Frantic Assembly will encourage the use of the DBS Update Service enabling practitioners to reuse their DBS certificate and employers can carry out free, instant online Status Checks on employees' DBS if requested. Frantic Assembly must see a valid DBS certificate in order for the Practitioner to represent the company.

### **Making a Referral to DBS**

Under legislation, the following can make referrals to the DBS:

- local authorities
- education authority in Northern Ireland
- health and social care bodies in Northern Ireland
- keepers of register in England, Wales or Northern Ireland
- supervisory authorities in England, Wales or Northern Ireland
- and

The power to refer happens when an organisation is not acting as a regulated activity provider. This will usually be when the organisation is undertaking their safeguarding role.

The power to refer can be used when an organisation thinks a person has either:

- harmed or poses a risk of harm to a child or vulnerable adult
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence and;
- the person they're referring is, has or might in future be working in regulated activity and;
- the DBS may consider it appropriate for the person to be added to a barred list

### **Legal duty to refer: the two conditions that must be met**

Frantic Assembly must make a referral when both of the following conditions have been met:

#### Condition 1

- The company withdraws permission for a person to engage in regulated activity with children and/or vulnerable adults. Or the person is moved to another area of work eg: the person was re-deployed, resigned, retired, or left.

#### Condition 2

You think the person has carried out 1 of the following:

- engaged in conduct in relation to children and/or adults where an action or inaction has harmed a child or vulnerable adult or put them at risk or harm, or
- even if there has been no relevant conduct which has harmed anyone but a risk of harm to a child or vulnerable still exists, or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations ) offence.

Referrals can be made using the [online referral form](#).

## **5.6 Training**

Checks are only part of the process to protect children and young people from possible abuse. Appropriate training will enable individuals to recognise their responsibilities with regard to their own good practice and the reporting of suspected poor practice/concerns of possible abuse.

Effective management will be provided for staff through supervision, support and training. Frantic Assembly will seek out training opportunities for all staff



to ensure that they are able to recognise the signs and symptoms of possible abuse and neglect and are aware of the guidelines for making referrals.

All staff will be given regular opportunities to give and receive feedback, in order to identify training needs and set new goals.

Any staff who require safeguarding training or refresher training should contact the DSO for this to be provided.

## 5.7. Responsibility

It is the responsibility of all Frantic Assembly trustees, employees and representatives to adhere to this policy and its guidelines. The effectiveness of this policy and its related procedures will be monitored and developed where necessary by the DSO and Senior Management. The Board of Directors will review the policy every two years and agree to any changes.

## 5.8 Dissemination

Frantic Assembly will make the Safeguarding Policy available to all staff, practitioners, representatives and volunteers. It should be made clear to staff, practitioners, representatives and volunteers that failure to conform to the policy will result in disciplinary action and possible exclusion from the organisation.

When Frantic Assembly is working in partnership with another organisation or agency (e.g. a school), they will be made aware that this policy is in place and can be obtained from the website.

This policy will be available to all Frantic Assembly staff and representatives and any outside organisations or individuals. Requests for copies of the documents should be submitted to the DSO or downloaded from the company website.

## 6. USE OF PHOTOGRAPHIC/FILMING EQUIPMENT

Photographing and filming young people under the age of 18 or vulnerable adults will only be allowed when a legal guardian (parent/carer) has given prior consent and only if intended for use as a teaching aid or promotional tool.

If a member of Frantic Assembly intends to photograph or film young people participating in the company's Learn and Train activities, they must speak to the DSO who will liaise with the host organisation and issue photo permission forms and guidelines to parents in advance (see appendix H and I).

These forms must be signed by a legal guardian and returned on or before the day of photography/filming. If forms are not returned photography and filming cannot be allowed.

## 7. ONLINE

### 7.1 Social Media

Frantic Assembly engages with several social media platforms – Twitter, Facebook, Instagram, Vimeo and YouTube. The company is represented by authorised users who post on behalf of the organisation, and employees (permanent or temporary), representatives, performers and members of the creative teams who comment about Frantic Assembly on their personal channels.

The General Manager has overall responsibility for digital communications on all social platforms and content on our website. ([www.franticassembly.co.uk](http://www.franticassembly.co.uk)).

Frantic Assembly's Social Media Policy has clear guidance for any other staff or representatives posting on these forums on behalf of the company, including a section on Social Media and Safeguarding.

All practitioners and staff should refer to Frantic Assembly's Social Media Policy for guidelines to ensure their own and the company's, safety and reputation online.

## 8. FRANTIC ASSEMBLY'S DESIGNATED SAFEGUARDING OFFICER

The overall responsibility for safeguarding young people and vulnerable adults lies with the Senior Management and Trustees of Frantic Assembly. The Trustees have appointed the Head of Learning & Participation, as the Designated Safeguarding Officer (DSO). The role of the DSO is, in close liaison with the Senior Management, to lead on day to day safeguarding procedures. This will include:

- Attending child protection & safeguarding training and keeping up-to-date with current legislation and developments in the field of child protection & safeguarding.
- Providing all employees, representatives and volunteers with a full induction to the Safeguarding Policy and Procedures and good practice guidelines.
- Ensuring that new employees, practitioners and volunteers complete a self-disclosure form (see appendix B)

- Undertaking practical measures to support all employees and representatives delivering Regulated Activity in applying for Enhanced Disclosure Certificates through the Disclosure and Barring Service.
- Acting as the main point of contact for Frantic Assembly’s employees, representatives and volunteers on matters of safeguarding and good practice for working with young people and vulnerable adults.

In consultation with the Senior Management, the DSO will respond to safeguarding enquiries from parents, young people, Host organisations and outside agencies. Together, the DSO and Senior Management/Trustees will act on any allegations and incidents in liaison with Hosts, Children’s Services and the NSPCC and other relevant authorities.

The DSO will give advice if an enquiry concerns any matter relating to the young people or vulnerable adults that participate in Frantic Assembly’s Learn and Train activities or the practitioners that deliver this programme. There may be circumstances where the concerns are about poor practice rather than abuse (defined in appendix A); in these cases, it is still important to take advice as this may be just one of a series of other instances which, taken together, give cause for concern.

In the instance that the DSO is unavailable to respond to matters regarding child protection or safeguarding vulnerable adults, Frantic Assembly’s Executive Director will lead as DSO.

## 9. TERMINOLOGY

The following terminology is used throughout this policy:

‘child protection’	is protecting children from abuse and neglect
‘safeguarding’	is the action that is taken to promote the welfare of children and vulnerable adults to protect them from harm
‘young person/people’	refers to children and young people up to their 18th birthday
‘vulnerable adult’	An adult who has, or may need community care services by reason of, a mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
‘representatives’	people working for/with Frantic Assembly on a freelance or fixed term basis, who represent the

company, including Frantic Practitioners, those who undertake the majority of the company's work with children, young people and vulnerable adults.

‘practitioners’	freelance artists who work regularly with Frantic Assembly as workshop leaders and directors, who undertake the majority of the company's Learn and Train work, with children, young people and vulnerable adults.
‘abuse and neglect’	abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. (see appendix A for full definitions of abuse)
‘activities’	refers to Frantic Assembly's programme of activities available for all participants. This typically (but not exclusively) includes one-off workshops, residencies, work placements, talks and performances.
‘DBS’	is the Disclosure and Barring Service (replacement to the CRB). A DBS check is for those working in Regulated Activity with Children or Vulnerable Adults
‘Regulated activity’	<ol style="list-style-type: none"> <li>1. Unsupervised activities: teaching, training, instructing, caring for or supervising children, or providing advice / guidance on well-being.</li> <li>2. Work for a limited range of establishments (specified places), with opportunity for contact, for example schools, children's homes</li> <li>3. Activity done regularly: carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period (or in some cases, overnight)</li> </ol>
‘Not regulated activity’	<ol style="list-style-type: none"> <li>1. If staff work under a reasonable level of supervision: reasonable in all the circumstances for the purpose of protecting the participants concerned &amp; carried out by someone who is in regulated activity (eg teacher).</li> <li>2. If work in specified places consists of occasional or temporary services</li> <li>3. If it doesn't meet the frequency test: carried out by the same person frequently (once a week or more often), or on four or more days in a 30-day period (or in some cases, overnight)</li> </ol>

'Frantic Assembly hosted'	refers to activities that are being led by Frantic Assembly, in which they are solely responsible for ensuring participants' safety. This is regulated activity.
'Host'	is used to describe an organisation or educational institution that has invited Frantic Assembly to deliver Learn activities for members of the organisation, students or exclusive audience. This is not regulated activity.
'LADO'	Every local authority has a Local Authority Designated Officer who is responsible for co-ordinating the response to concerns that an adult who works with children may have caused them or could cause them harm.
'Children's Services'	Local authority children's services have responsibilities for the children they look after who live with foster carers or in residential care on either a short- or long-term basis.
'Serious incident'	An incident is a serious incident requiring prompt notification if it could have a significant impact on the charity. A report should certainly be made if: <ul style="list-style-type: none"> <li>- the level of harm to the victim is high; and/or</li> <li>- the risk to the charity's reputation is high; and/or</li> <li>- the incident(s) suggest(s) systemic problems.</li> </ul>
'Senior Management'	The senior management team of Frantic Assembly is made up of the following employees: Artistic Director, Executive Director, Head of Learning & Participation, General Manager and Producer.
'Executive Director'	Currently the role is occupied by Kerry Whelan, <a href="mailto:kerry@franticassembly.co.uk">kerry@franticassembly.co.uk</a>

## 9. APPENDICES

### Appendix A Definitions of Abuse

- 1 Child Abuse
- 2 Abuse of Vulnerable Adults

#### 1. Definitions of Child Abuse

The definitions of abuse as set out below are in line with current NSPCC guidelines.

##### 1.1. What is abuse and neglect?

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

##### 1.2 Physical abuse

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.

It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. It includes Female Genital Mutilation (FGM) which is a criminal offence and must be reported. There's no excuse for physically [abusing a child](#). It causes serious, and often long-lasting, harm – and in severe cases, death.

##### 1.3 Emotional abuse

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development.

Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them.

Children who are emotionally abused are usually suffering another type of [abuse or neglect](#) at the same time – but this isn't always the case.

##### 1.4 Sexual abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities.

This doesn't have to be physical contact and it can happen online, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Sometimes the child won't understand that what's happening to them. They may not even understand that it's wrong.

## 1.5 Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of [sexual abuse](#) in which children are sexually exploited for money, power or status.

Children or young people 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 online](#).

Some [children and young people are trafficked](#) into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to [young people in gangs](#).

## 1.6 Neglect

Neglect is the ongoing failure to meet a child's basic needs and is [the most common form of child abuse](#).

A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care.

A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents. A child who's neglected will often suffer from other [abuse](#) as well. Neglect is dangerous and can cause serious, long-term damage - even death.

## 1.7 Online Abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

## 2. Definition of Abuse of Vulnerable Adults

Adult abuse is defined as a single or repeated act or lack of appropriate actions, occurring within any relationship where there is an expectation of trust, which causes harm or distress to a vulnerable person.

### 2.1 Safeguarding Vulnerable Adults

Safeguarding adults is defined by the Care Act (2014) as:

*'... protecting an adult's rights to live in safety, free from abuse and neglect'<sup>[1]</sup>.*

Protecting adults at risk of harm involves identifying abuse and acting whenever someone is being harmed. The Department of Health defines a vulnerable adult as a person aged 18 years or over who is or may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

### 2.2 Risk Factors for Abuse

- Lack of mental capacity
- Increasing age
- Being physically dependent on others
- Low self esteem
- Previous history of abuse
- Negative experiences of disclosing abuse
- Social isolation
- Lack of access to health and social services or high-quality information

### 2.3 Types of Abuse

There are ten types of abuse listed in the Care Act (2014):

- **Physical abuse** may involve physical violence, misuse of medication, inappropriate restraint or sanctions.
- **Sexual abuse.**
- **Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, harassment, verbal abuse.



- **Financial or material abuse**, including theft, fraud, exploitation, pressure in connection with wills, property, inheritance, or financial transactions, misuse or misappropriation of property, possessions, or benefits.
- **Neglect and acts of omission**, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care, or educational services, withholding medication, adequate nutrition, and heating.
- **Discriminatory abuse**, including racist, sexist or abuse based on a person's disability.
- **Domestic abuse** - including psychological, physical, sexual, financial, emotional abuse, so-called 'honour'-based violence.
- **Modern slavery** - includes slavery, human trafficking, and forced labour and domestic servitude.
- **Organisational abuse** - including neglect and poor care practice within an institution or specific care setting such as a hospital or care home.
- **Self-neglect** - includes a wide range of behaviour neglecting to care for personal hygiene, health or surroundings and includes behaviour such as hoarding.

**1. Appendix B**

**Self-disclosure form for applicants for posts involving contact with young people or vulnerable adults**

Frantic assembly is committed to safeguarding all participants from physical, sexual and emotional harm. As part of our Safeguarding Policy & Procedure, we require applicants for posts involving contact with young people to complete this self-disclosure form. Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences. Every effort will be made to ensure that this information is kept confidential and will not be shared without consent.

Officer responsible for safety and children's issues:

Name: Marilyn Rice  
Contact No: 020 7841 3115

**Declaration from staff and volunteers working with children**

1. Have you ever been convicted of a criminal offence or been the subject of a Caution or a Bound Over Order?

Yes  No

*You are advised that, under the provisions of the Rehabilitation of Offenders Act (UK wide) (1974) (Exceptions) (Amendments) Order 1986 (UK wide) you should declare all convictions, **including spent convictions.***

If yes, please state below the date(s) and nature of the offence(s) and sentence(s) received (if any).

.....  
.....

2. Are you a person known to any Children and Families Social Care Department as being an actual or potential risk to children / young people?

Yes  No

If yes, please supply details

.....  
.....

3. Have you ever had any disciplinary sanction relating to child abuse?

Yes  No

If yes, please supply details

.....  
.....

**Personal Information:**

Mr / Mrs / Miss / Ms / Other

First name.....Surname.....

Any surname(s) previously known by.....

Address.....

.....

.....Postcode.....

Telephone:.....

Email.....

Date of Birth.....

Place of Birth.....

NI Number.....

**Declaration:** *I declare that to the best of my knowledge the information given above is correct and understand that any misleading statements or deliberate omission may be sufficient grounds for cancelling my appointment. I understand that I may be asked to apply for a Criminal Records Disclosure and consent to do so if required. I understand that the information contained in this form and in the Disclosure may be disclosed, where strictly necessary, to regulatory bodies and/or third parties who have an interest in child protection issues.*

Signed: ..... Date: .....

**2. Appendix C**

**Frantic Assembly**

**Safeguarding Incident Report Form**

**Guidance on using the incident report form:**

- This form should be used when recording any significant incident (other than an accident) at work that involves a child, young person or vulnerable adult participating in Frantic Assembly's activities.
- Make sure you write your account as soon as possible after the incident occurs.
- Make sure you sign and date the form.
- Try to include names, addresses, telephone numbers and dates of birth if possible.
- Include matters of fact, observations, statements made by other people involved (remember to use exact words) and your actions and words.
- If you wish to express your opinion make sure that you can substantiate it with fact.
- Pass your report to the Designated Safeguarding Officer for Frantic Assembly.
- These reports will be kept for 12 months and then destroyed if no further action is required, unless it involves a Frantic Assembly's employee or volunteer, in which case it will be kept in their personal file.

**Incident Report:**

Date of incident: \_\_\_\_\_

Time of incident: \_\_\_\_\_

Contact name, number and address for the location of incident: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Name of child/young persons affected: \_\_\_\_\_

DOB: \_\_\_\_\_

Contact name, number and address for next of kin: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

What happened?: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

What was said?: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

What did you, or any other individual say? Record contact details of these people, including names, numbers and addresses:

---

---

---

---

What else did you observe, if anything?: \_\_\_\_\_

---

---

---

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**Your details:**

Your name: \_\_\_\_\_

Position or relationship to child/young person? \_\_\_\_\_

Address: \_\_\_\_\_

Tel: \_\_\_\_\_ Mobile: \_\_\_\_\_

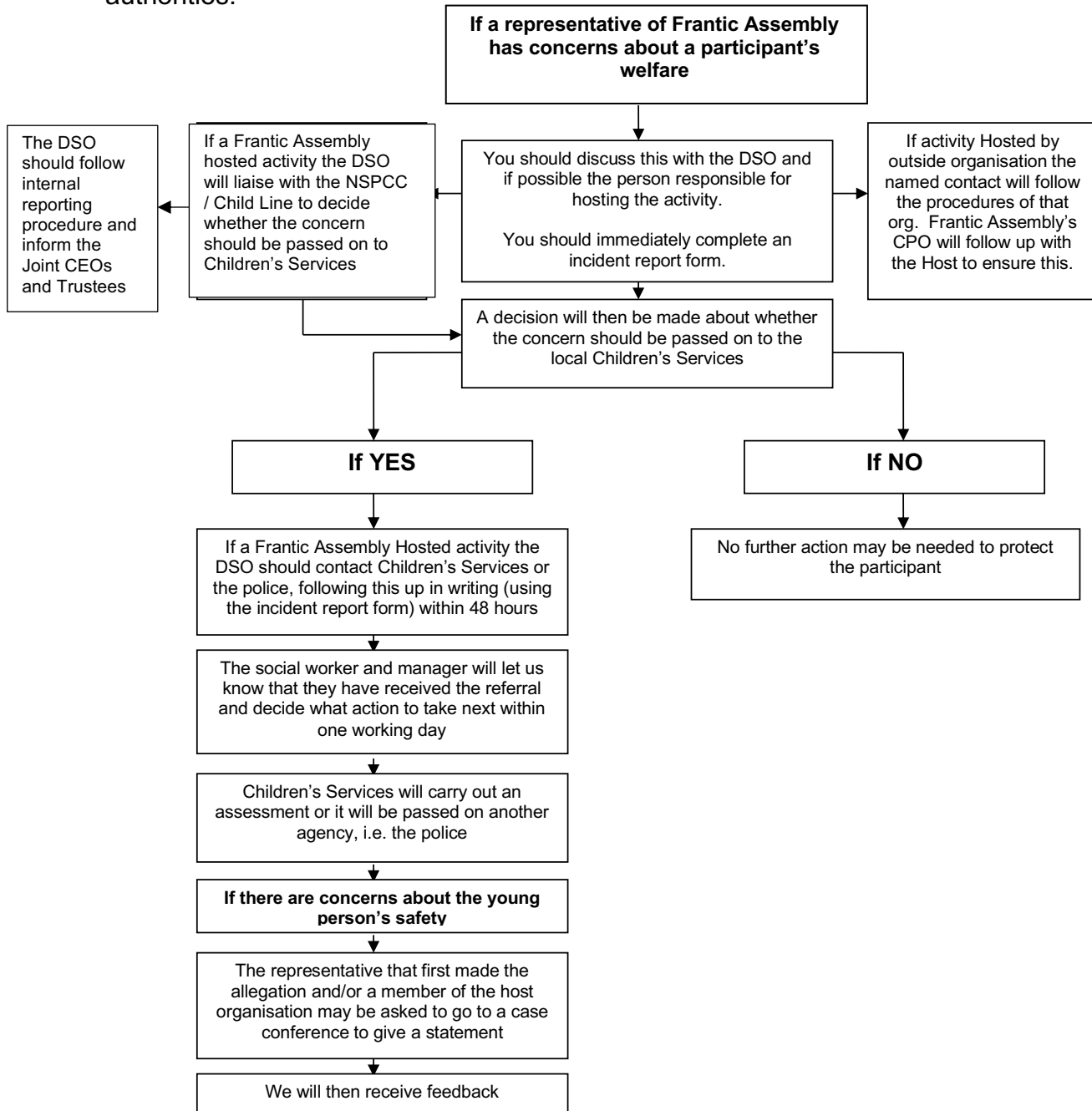
Signature: \_\_\_\_\_ Date \_\_\_\_\_

DSO signature: \_\_\_\_\_

## 4. Appendix D

### Course of Action for Reporting an Incident of Abuse

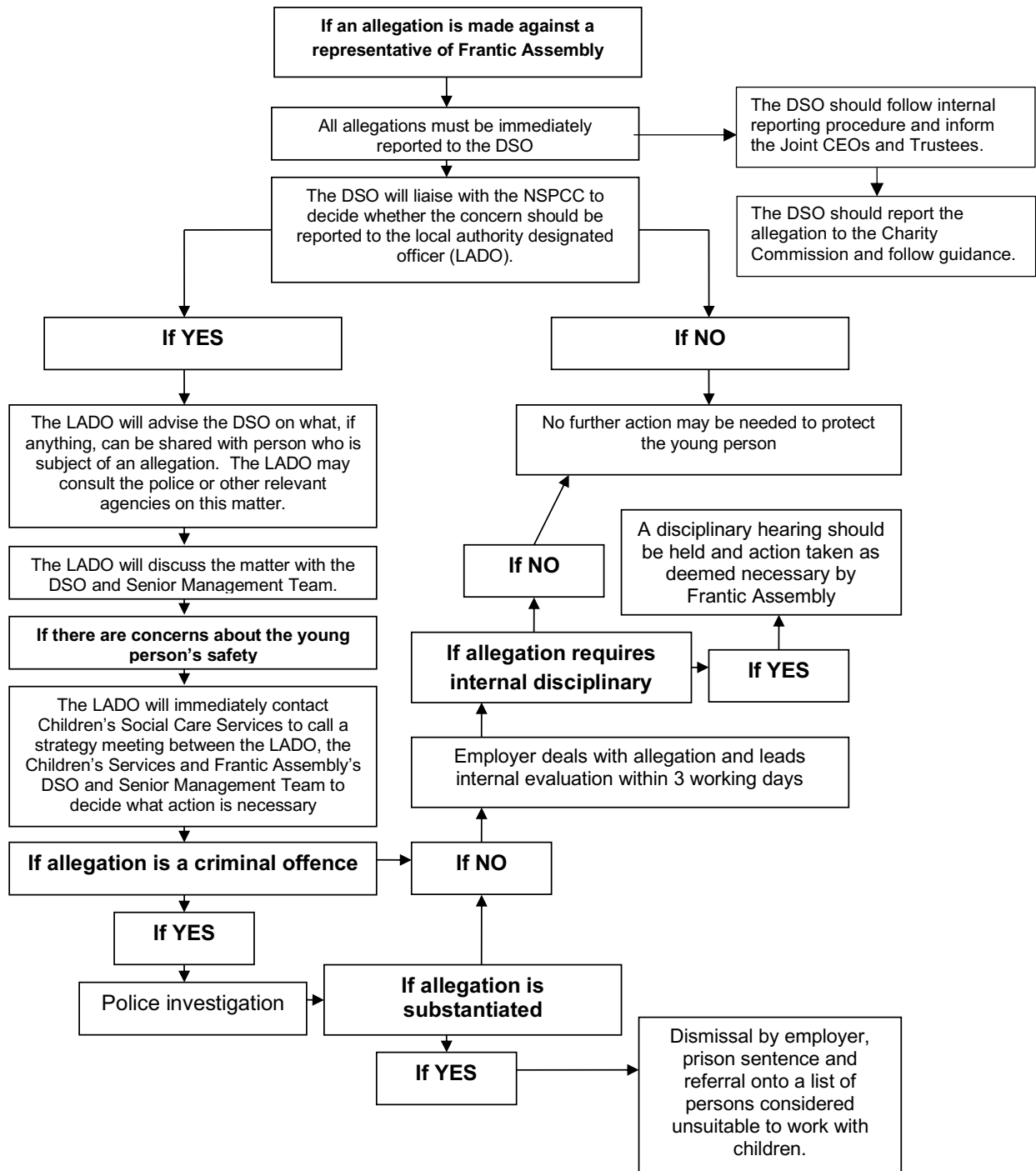
If any representative of Frantic Assembly has a concern regarding safeguarding issues or abuse the company should follow the course of action outlined in this document. The company will not withhold any information from investigating authorities.



## 3. Appendix E

### Course of Action for Managing Allegations

If an allegation of abuse is made against any representative of Frantic Assembly, the company will support the accused person, but will follow the course of action as set out in this document. The company will not withhold any information from investigating authorities:





**4. Appendix F**

**Approach to Records Retention and Storage**

(Based on NSPCC Guidance on child protection records retention and storage)

**10. GUIDANCE ON RETENTION PERIODS**

Type of record	Retention
<p>Child or vulnerable adult welfare concerns that your organisation refers on to social care or the police. For example, this would include concerns about physical, sexual, emotional or neglect of a child or vulnerable adult, disclosures from a child or vulnerable adult about being abused or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person or vulnerable adult who has been abused by another young person or vulnerable adult.</p>	<p>The referral should be acknowledged in writing by social care and your organisation keeps this on file.</p> <p>Records should be kept for 6 years after the last contact with the service user unless any exemptions apply or if your organisation is required to comply with any other statutory requirements.</p>
<p>Child or vulnerable adult welfare concerns that your organisation decide, after consultation, do not necessitate a referral to social care or the police. In such circumstances the organisation should make a record of the concern and the outcome. For example, where a child or vulnerable person has been bullied, overly pushy parents/carers or a very distressed child or vulnerable adult where the distress is unrelated to child abuse.</p>	<p>Destroy the record a year after the child/adult concerned ceases to use the service unless the child or adult are continuing to use your organisation.</p>
<p>Concerns about people (paid and unpaid) who work with children and young people, for example, allegations, convictions, disciplinary action, inappropriate behaviour towards children, young people or vulnerable adults. For example, where an employee has breached the code of conduct, a record of the behaviour, the action taken and outcome should be recorded.</p>	<p>Personnel files and training records (including disciplinary records and working time records) - retain for 6 years after employment ceases. However, the records should be retained for a longer period if any of the following apply:</p> <ul style="list-style-type: none"> <li>• There were concerns about the behaviour of an adult who was working with vulnerable people where s/he behaved in a way that has harmed, or may have harmed, a child or vulnerable adult;</li> </ul>

	<ul style="list-style-type: none"> <li>• The adult possibly committed a criminal offence against, or related to, a child or vulnerable adult;</li> <li>• The adult behaved towards a child or vulnerable adult in a way that indicates they are unsuitable to work with children</li> </ul> <p>In such circumstances, records should be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.</p>
Disclosure and Barring Service disclosures obtained as part of the vetting process.	The actual disclosure form must be destroyed after 6 months. However, it is advisable that organisations keep a record of the date of the check, the reference number, the decision about vetting and the outcome.

## 11. STORAGE OF RECORDS

Some pointers to good practice:

- Information about concerns, allegations, and referrals should not be kept in one 'concern log' rather information or items relating to individuals need to be kept in separate files.
- Compile and label files carefully.
- Files containing sensitive or confidential data should be locked away and access to the keys strictly controlled.
- Keep a key log so that it is possible to see who has accessed the cabinet, when, and the titles of the files they have used.
- Access to those records needs to be limited to people in named roles who either need to know about the information in those records and/or who manage the records/files.
- If files are to be stored long term then arrangements need to be made for the keys to be passed from outgoing staff to their successors.
- If records are stored electronically then password protect those records, which only limited staff should have access to.
- Where a local service/activity is closed arrangements must be in place for ongoing management of the records relating to that service/activity including the review and disposal of records.

## 12. DESTRUCTION OF RECORDS

Records should be incinerated or shredded in the presence of a member of the organisation or entrusted to a firm specialising in the destruction of confidential material. This action must be taken at the same time as the electronic record is

purged. If not shredded immediately, all confidential records must be held in a secured plastic bag, labelled as confidential and locked in a cupboard or other secure place.

## 5. Appendix G

### Guidance for the use of Images of Children and Young People

#### INTRODUCTION

The safety of children and young people is paramount in all of Frantic Assembly's activities. This document has been developed by Frantic Assembly to provide guidance on the use of images of children and young people. The policy document is kept by the organisation's administrators and is available to all people on request.

Frantic Assembly is committed to providing a safe environment for children and young people under the age of 18. Implicit in this is the commitment to ensure that all publications, resources and media represent participants appropriately and with due respect. By adopting the points outlined in this guideline Frantic Assembly aims to follow the best possible practice to protect children and young people wherever photographs or recorded images are taken and stored.

#### KEY CONCERNS

The key concerns contained within this policy regarding the use of images of children/young people relate to:

- The possible identification of children when a photograph is accompanied by personal information.
- The inappropriate use, adaptation or copying of images for use on child pornography websites.
- The taking of inappropriate photographs or recorded images of youngsters.

#### RECORDING IMAGES OF CHILDREN/YOUNG PEOPLE

There have been concerns about the risks posed directly and indirectly to children and young people through the use of photographs on websites and other publications. Photographs can be used as a means of identifying children when they are accompanied with personal information, for example: "This is a member of the Anywhere Junior Theatre Company who likes Atomic Kitten". This information can make a child vulnerable to an individual who may wish to start "grooming" that child for abuse. Secondly, the content of the photo can be used or adapted for inappropriate use. There is evidence of this adapted material finding its way onto child pornography sites.

#### GUIDELINES FOR RECORDING IMAGES

- All children featured in recordings taken by Frantic Assembly must be appropriately dressed with outer clothing garments covering their torso from at least the bottom of their neck to their thighs, (i.e. a minimum of vest/shirt and shorts)
- The photograph should ideally focus on the activity

- Where possible images of children and young people should be recorded in small groups (the group may comprise any combination of adults and children)
- Frantic Assembly will try to ensure that images of a young person, who is under a court order, are not recorded or published
- Any instances of the use of inappropriate images should be reported to the NSPCC Helpline or the Internet Watch Foundation (IWF) and the Charity Commission.
- Frantic Assembly practitioners and directors should still be allowed to use video equipment as a legitimate teaching aid. However, children/young people and their parents/carers should be aware that this is part of the teaching programme and care should be taken in the storing of such films

## GUIDELINES FOR PUBLISHING IMAGES

- If the child is named, Frantic Assembly should avoid using their photograph
- If a photograph is used, Frantic Assembly should avoid naming the young person or use their first name only. Personal details of children such as an email address, home address and telephone numbers should never be revealed on a website
- Frantic Assembly should request both the young person's and parent/carers permission to use their image. This ensures that they are aware of the way the image is to be used to represent the activity. A Parent/Carer and Child Permission Form is the best way of achieving this and should be completed before any photographs or recorded images are taken (see Permission Form)
- In order to guard against the possibility of a young person under a court order appearing on a website, Frantic Assembly will not simultaneously stream images of children and young people onto a website. Delayed streaming provides an opportunity for the editing of inappropriate clips (e.g. disarranged clothing).
- Frantic Assembly will carefully consider images of children and young people used in all publications so that images deemed inappropriate are not used.
- Frantic Assembly will try to take photographs that represent the broad range of youngsters participating in activities. This might include:
  - boys and girls
  - disabled people
  - minority ethnic communities
  - people with specific religious beliefs
  - a range of clothing e.g. tracksuit/jogging trousers

## GUIDELINES FOR USE OF PHOTOGRAPHIC FILMING EQUIPMENT AT FRANTIC ASSEMBLY EVENTS

There is evidence that some people have used arts or education events as an opportunity to take inappropriate photographs or film footage of children or young people. While this might be rare, Frantic Assembly recognises that a duty of care to young people is necessary to ensure that this risk is as small as possible.

If Frantic Assembly commission a professional photographer or invite the press to an event that involves children or young people we will ensure that they are clear about our expectations of them in relation to child protection. The following steps will be taken to help reduce risk:

- A clear brief will be provided about what is considered appropriate in terms of content and behaviour
- The photographer will be issued with identification, which must be worn at all times
- Participants and parents will be informed in advance that a photographer will be in attendance at an event using the Permission Forms
- Access to the participants by photographers will be supervised by a CRB cleared member of Frantic Assembly's staff
- Frantic Assembly does not have the authority to approve/allow photo sessions outside the event or at a child/young person's home

Parents and spectators might also wish to take photographs or record their children participating at the event:

- If parents or other spectators are intending to photograph or video at an event they should also be made aware of your expectations
- Parents and spectators should be required to register at an event if they wish to use photographic equipment
- Participants and parents should be informed that if they have concerns about inappropriate or intrusive photography these should be reported to the event organiser and recorded in the same manner as any other child protection concern
- Event organisers should approach and challenge any person taking photographs who has not registered with them. They might need to refer to the local police force if this person continues to record images

## SUMMARY

Child protection is about putting in place the best possible practices and procedures; this will protect not only the child but also the adult (i.e. practitioners, photographer or parent). If you have any comments on these guidelines Marilyn Rice at Frantic Assembly (0207 841 3115).

**Appendix H  
Parent/Carer and Young Person/ Vulnerable Adult Permission Form  
For the Use of Photographs and Recorded Images**

Frantic Assembly would like to take photographs/video footage of the workshop you or your child is taking part in. We will only use the photographs/videos if we have your permission to do so.

This form should be signed by the legal guardian (usually parent/carers) of the participant, together with the participant. It provides permission for the images of the child/young person/vulnerable adult to be used. Please note that a separate form should be filled in for each participant.

Frantic Assembly recognises the need to ensure the welfare and safety of all young people and vulnerable adults involved in arts activities. As part of our commitment to ensure the safety of participants we will not permit photographs or videos of them to be taken or used without the consent of the parents/carers and the participant themselves. Frantic Assembly will follow the guidance for the use of images of young people and vulnerable adults, a copy of which is attached.

Frantic Assembly will take all steps to ensure these images are used solely for the purposes they are intended which is the promotion and documentation of our education and training programme. If you become aware that these images are being used inappropriately you should inform Marilyn Rice at Frantic Assembly immediately on 020 7841 3115 or [marilyn@franticassembly.co.uk](mailto:marilyn@franticassembly.co.uk).

These images may be used on our website which can be found at [www.franticassembly.co.uk](http://www.franticassembly.co.uk)

If at any time either the parent/carer of the young person wishes data to be removed from the website, seven days' notice must be given to the administrator after which the data will be removed.

**Please keep the top half of this page for your information and return the bottom half to the Learning & Participation Coordinator.**

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**This section to be completed by the participant:**

I.....(name of participant) consent to Frantic Assembly photographing or videoing my involvement in arts activities under the rules and conditions stated above.

Signed..... Date.....

**This section to be completed by the parent/carers:**

I.....(parent/carers full name) consent to Frantic Assembly photographing or videoing .....(name of participant) under the rules and conditions stated above and I confirm that I am legally entitled to give this consent.

I also confirm that .....(participant) is not under a court order.

Signed..... Date.....

## 7. Appendix I

### Useful Contact Details

Organisation	Address	Telephone/website
<b>Report all allegations and concerns to: Marilyn Rice</b>	Frantic Assembly New Wing, Somerset House, Strand, London, WC2R 1LA	<b>020 7841 3115</b>
<b>Report allegations in Camden to: Multi-Agency Safeguarding Hub team (MASH)</b>	Multi-Agency Safeguarding Hub	<b>020 7974 3317</b> <a href="mailto:LBCMASHadmin@camden.gov.uk">LBCMASHadmin@camden.gov.uk</a>
<b>For advice on child protection: Karen Lahat</b>	Camden Safeguarding Children Board 5 Pancras Square London N1C 4AG	<b>020 7974 4556</b>
<b>For advice on or reporting illegal content on the internet: Internet Watch Foundation</b>	East View 5 Coles Lane Oakington Cambridge CB24 3BA	<b>01223 237 700</b> General Enq: <a href="mailto:webmaster@iwf.org.uk">webmaster@iwf.org.uk</a> Reporting: <a href="http://www.iwf.org.uk/reporting.htm">http://www.iwf.org.uk/reporting.htm</a>
<b>NSPCC</b>	National Centre Weston House 42 Curtain Road London EC2A 3NH	<b>Helpline: 0808 8005000</b> <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> <a href="http://www.nspcc.org.uk/">http://www.nspcc.org.uk/</a>
<b>NSPCC FGM Helpline</b>		<b>Helpline: 0800 028 3550</b> <a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a> <a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/</a>
<b>Childline UK</b>	Freepost 1111 London N1 OBR	<b>0800 1111</b> <a href="http://www.childline.org.uk/">http://www.childline.org.uk/</a>
<b>Charity Commission</b>		<a href="https://ccforms.charitycommission.gov.uk/report-a-serious-incident">https://ccforms.charitycommission.gov.uk/report-a-serious-incident</a>
<b>Disclosure and Barring Service</b>	PO Box 3961 Royal Wootton Bassett SN4 4HF	<b>03000 200 190</b> <a href="mailto:customerservices@db.s.gsi.gov.uk">customerservices@db.s.gsi.gov.uk</a> <a href="http://www.disclosure.gov.uk/">http://www.disclosure.gov.uk/</a>
<b>Child Protection in Sport Unit</b>	3 Gilmour Close Beaumont Leys Leicester L4 1EZ	<a href="https://thecpsu.org.uk/contact-us/">https://thecpsu.org.uk/contact-us/</a>
<b>Department of Health</b>	Consultancy Service Room 133, Dept. of Health Wellington House 133-135 Waterloo Road SE1 8UG	<a href="https://www.gov.uk/government/organisations/department-of-health">https://www.gov.uk/government/organisations/department-of-health</a>

**In an emergency telephone 999**



**Appendix K**

**Useful Sources of Information**

First Check: A step by Step guide for organisations to safeguard children (£30)	<a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a> Publications and Information Unit NSPCC, Weston House 42 Curtain Road London EC2A 3NH Tel 020 7825 2775
Working in Schools: A practical Guide to the Partnership by Charlotte Jones (free to download from ITC website)	<a href="http://www.itc-arts.org">www.itc-arts.org</a> Independent Theatre Council
Keeping Arts Safe: Protection of children, young people and vulnerable adults involved in arts activities, 2003 ISBN 0-7287-0941-4 (free to download)	<a href="http://www.artscouncil.org.uk">www.artscouncil.org.uk</a> Arts Council England  Go to info and publications, publications, browse by subject, education and learning
Disclosure and Barring Service Website Includes lists of umbrella bodies and codes of practice for England and Wales.	<a href="http://www.gov.uk/dbs">www.gov.uk/dbs</a> Information line <b>03000 200 190</b>
CEOP (Child Exploitation and Online Protection)	<a href="http://www.ceop.police.uk/safety-centre/">http://www.ceop.police.uk/safety-centre/</a>
Internet watch Foundation	<a href="http://www.iwf.org.uk">www.iwf.org.uk</a>
<a href="#">UK Council for Child Internet Safety "Good practice guidance for providers of social networking and other user-interactive services"</a>	<a href="http://dera.ioe.ac.uk/1970/">http://dera.ioe.ac.uk/1970/</a> <a href="http://www.education.gov.uk/ukccis">http://www.education.gov.uk/ukccis</a>
Recruiting Safely: Guidance for employers and other bodies in the health and social care field on recruiting and retaining staff and volunteers with criminal records, 2001 (Nacro on behalf of the Forum on the Employment of Ex-Offenders in Care Settings)	c/o Nacro 169 Clapham Road London SW9 0PU  Tel 020 7582 6500
The Protection of Children Act 1999: A Practical Guide to the Act for all Organisations Working with Children (2000) (Department of Health)	<a href="http://www.doh.gov.uk/downloads/childprotect.pdf">www.doh.gov.uk/downloads/childprotect.pdf</a> go to publications and statistics, publications library, fill in the full title under title and search words.
What Rights Leaflet: the UN Convention on the Rights of the Child made simple (Unicef free to download)	<a href="http://www.therightssite.org.uk">www.therightssite.org.uk</a>  <a href="http://www.unicef.org">www.unicef.org</a> Helpdesk Tel 0870 606 3377

The United Nations Convention on the Rights of the Child	<a href="http://www.un.org">www.un.org</a>
Working together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (Department of Health, 1999)	<a href="http://www.doh.gov.uk/quality5.htm">www.doh.gov.uk/quality5.htm</a> under publications, policy and guidance
Child Protection in Sport Unit -Includes the Coaches Charter	<a href="http://www.sportprotects.co.uk">www.sportprotects.co.uk</a>
Foundation for Community Dance – guidelines and information on physical arts work	<a href="http://www.communitydance.org.uk">www.communitydance.org.uk</a>
Football Association information on use of images of Children	<a href="http://www.thefa.com">www.thefa.com</a>
Local Child Protection Co-ordinators	<a href="http://www.acpc.gov.uk">www.acpc.gov.uk</a>

**If you require a copy of this document in a different format or language contact 020 7841 3115.**

**Any queries relating to this document should be addressed to:**

Marilyn Rice  
Designated Safeguarding Officer  
Frantic Theatre Company Ltd  
020 7841 3115  
[marilyn@franticassembly.co.uk](mailto:marilyn@franticassembly.co.uk)