



BIMM
INSTITUTE

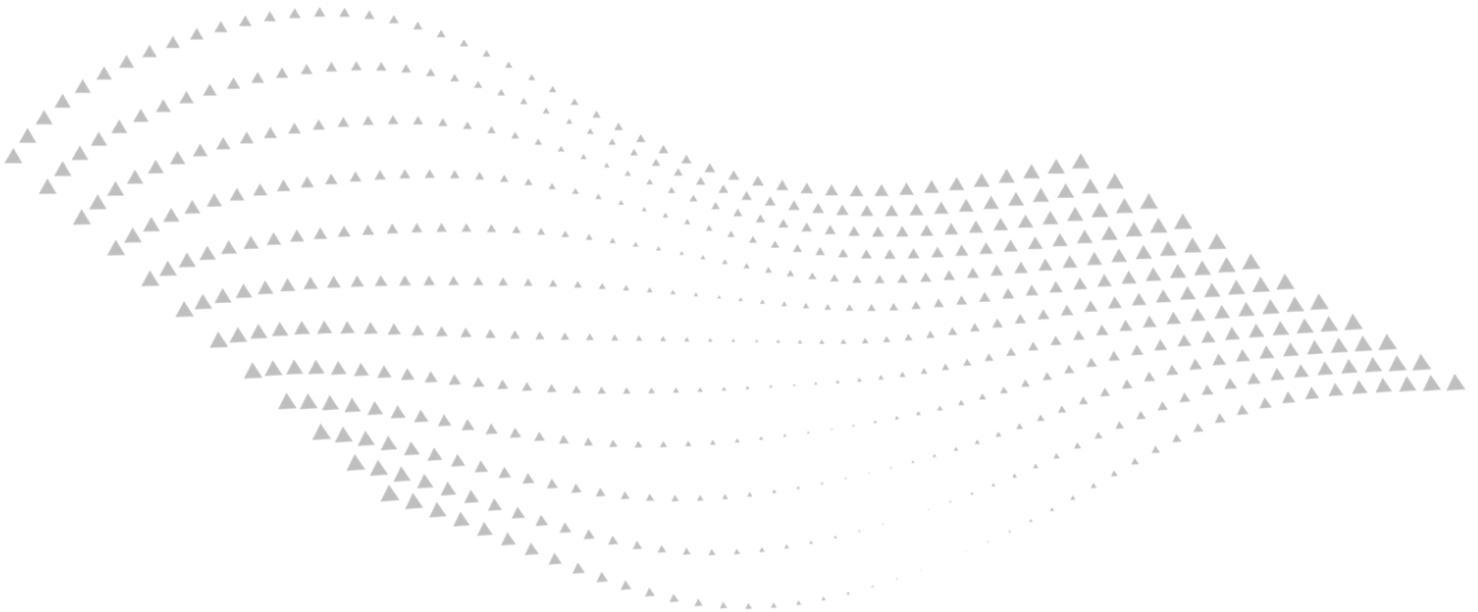


INSTITUTE FOR
CONTEMPORARY
THEATRE



PERFORMERS
COLLEGE

Safeguarding Policy



Last approved: December 2020

Approved by: Academic Board

Next review due: December 2021



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1. Policy Overview & Objectives:

This Safeguarding Policy applies to all UK Colleges of BIMM Institute, the Institute of Contemporary Theatre and Performers' College (collectively referred to as "the Institute").

For the purposes of this policy, the Institute defines:

- A child as a person who is under the age of 18.
- A vulnerable adult as an individual over the age of 18 who may have a mental or other disability or illness and lacks the capacity to take care of him or herself (i.e. at risk of neglect); and/or who may be unable to keep him or herself safe from the risk of significant harm, abuse or exploitation, including the risk of radicalisation or being drawn into terrorism.

The Institute is committed to taking all reasonable steps to promote and safeguard the welfare of students engaged in any activity and all UK Colleges pay close attention to, and work within the legislative safeguarding requirements documented in Keeping Children Safe in Education, and the statutory Prevent Duty.

The Institute has a duty, under the Children Act 1989, to ensure its functions are carried out to promote and safeguard the welfare of children under the age of 18. The Institute also has a duty, under the Care Act 2014, to promote and safeguard the welfare of vulnerable adults. The Institute ensures that all staff are clear that safeguarding is everyone's responsibility, and that all staff are aware of the signs and symptoms of abuse so that they are able to respond promptly and appropriately to safeguarding concerns. Where appropriate, the Institute works with other professionals to ensure a co-ordinated response to safeguarding issues.

This policy exists to ensure that all UK Colleges implement appropriate arrangements, systems and procedures to ensure that all staff have the right skills, means and resources to protect children and vulnerable adults from harm. Furthermore, the Institute recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth and that the Institute may be the only stable, secure and predictable environment in the lives of those students at risk. The Institute will endeavour to support those students through a range of mechanisms including a positive ethos where students feel secure and liaison with external agencies and expertise such as Social Services and other relevant support services.

This Policy will be reviewed on an annual basis and, if updates are required, submitted to Academic Board for approval.

1.1 Statutory Framework

In order to safeguard and promote the welfare of all, the Institute will act in accordance with the following legislation and statutory guidance:

- The Children Act 1989 and 2004
- The Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- The Care Act 2014
- Dealing with Allegations of Abuse Against Teachers and Other Staff
- Working Together to Safeguard Children July 2018
- Keeping Children Safe in Education – September 2020
- Procedures set out by the Local Safeguarding Children Board and Safeguarding Adults' Board
- DfE Coronavirus (COVID-19): safeguarding in schools, colleges, and other providers - May 2020

COVID-19

At the time of writing, the UK remains in midst of the COVID-19 pandemic, as such this policy is required to be compliant with the following, additional guidance:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

1.2 Safeguarding Objectives:

- To ensure the Institute practices safe recruitment in checking the suitability of staff to work with young people and vulnerable adults.
- To raise awareness of child protection issues and to equip young people and vulnerable adults with the skills needed to make them safe.
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse.
- To support young people and vulnerable adults who have been abused.
- To establish a safe environment in which young people and vulnerable adults can learn and develop.

We recognise that because of their day-to-day contact with the students, teaching staff, and support staff are well placed to observe the outward signs of abuse. UK Colleges will:

- Establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Ensure that young people and vulnerable adults know that there are designated staff in the College whom they can approach if they are concerned or upset.

In order to meet our safeguarding objectives, the Institute will:

- Ensure we have a designated lead professional at each college who will be responsible for safeguarding issues and receive appropriate training and support for this role.
- Ensure all staff are aware of the systems which support safeguarding and explain these as part of staff induction.
- Ensure all staff and relevant external parties know how to contact the designated members of staff and are fully aware of their roles.
- Ensure that all staff and relevant external parties understand their responsibilities in being alert to the signs of abuse and their responsibility for referring their concerns to the designated members of staff.
- Notify Social Services and/or other appropriate agencies if there is an unexplained absence of a learner who is on the child protection register.
- Notify Social Services and/or other appropriate agencies if there are any concerns about the welfare and safety of any students.

- Develop effective links with referral agencies and cooperate as required with their enquiries regarding safeguarding matters.
- Keep written records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure that all records are kept securely in line with the Institute's IT and data protection policies.
- Ensure strict adherence to procedures when an allegation of any kind concerning students is made against a member of staff.
- Ensure safe recruitment practices are followed.

2. The Institute's Responsibilities

All UK Staff will:

- Make themselves familiar with this Safeguarding Policy and the accompanying procedures, which will be provided at induction and made available on the VLE and the main website.
- Read Part 1 of Keeping Children Safe in Education, which will be added to individual PeopleHR profiles during induction and as updates are released, as well as made available on the VLE.
- Direct contact staff must also read Annex A of KCSIE.
- Be alert to the signs of abuse as detailed in the accompanying guidance and act in accordance with this policy if a student presents with indicators of abuse.
- Report any concerns immediately to any of the Safeguarding Officers or the Designated Senior Lead for safeguarding and identify children who may benefit from early help.
- Raise concerns about poor or unsafe practice with the designated safeguarding lead.
- Participate in annual safeguarding updates/training.
- Understand the College's procedure for dealing with peer-on-peer abuse.

The College Principal will:

- Where appropriate, act as support to the designated safeguarding lead in relation to their safeguarding responsibilities.

The Designated Senior Lead for Safeguarding at each UK College will:

- Act as the point of contact for all matters concerning Safeguarding in relation to students, coordinate action within the College, and liaise with external agencies where appropriate.
- Ensure that the policies and procedures are adopted by the BIMM Limited Board and are appropriately monitored.
- Monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner.
- Ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly.
- Act as a source of support, advice and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.
- Liaise with the Principal to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989, and police investigations.
- Ensure that there are appropriately qualified Safeguarding Officers in place across the College.
- Ensure that all those within the College are familiar with the College's Safeguarding Policy and Procedures, and that this is reviewed and updated annually.

- Ensure the Safeguarding Policy and Procedure is available publicly, and parents are aware of the fact that referrals about suspected abuse or neglect may be made, and the role of the College in this.
- Link with the Local Safeguarding Childrens' Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Liaise with Human Resources to ensure that the College complies with its responsibilities with regard to training staff on Safeguarding.
- Liaise with families and the appropriate child protection agencies on individual cases and make referrals to appropriate agencies in consultation with the Local Authority Designated Officer (LADO).
- Ensure that appropriate action is taken to exclude, refuse admission or employment, to any individual who may pose a risk to children or vulnerable adults.
- Ensure that all staff are aware of the early help that is available within the college and externally and support staff to access this as appropriate.
- Organise Safeguarding induction training for all newly appointed staff, whole staff training, refreshed with annual updates;
- Provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education;
- Make use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met;
- Refer a student to the Multi Agency Safeguarding Hub (MASH), when there are concerns about possible abuse and neglect;
- Refer a student to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- Keep written records of concerns about students, including the use of body maps, even where there is no need to refer the matter immediately;
- Ensure that all child protection records are kept securely, separate from the main pupil file, and in locked locations;
- Ensure that all child protection files are transferred in a safe and timely manner when a student moves setting, both between and across phases, within and out of county;
- Develop effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings
- Undertake appropriate training, every 2 years, relevant to the role of the Designated Senior Lead for Safeguarding and the Prevent Duty.

Safeguarding Officers will:

- Ensure that they receive regular training and updates on current safeguarding practice.
- Ensure that they follow up any safeguarding concerns reported to them, and that they are dealt with in a timely and professional manner.
- Make appropriate referrals to Social/Community Services and/or the Police, where there are concerns that the child or vulnerable adult is or may be, being abused.

The Institute's People Team will:

- Be committed to operating safer recruitment procedures.
- Monitor compliance with the Disclosure Barring Service (DBS) Policy by ensuring that there are sound arrangements for appropriate checks on staff.
- Maintain a single central record of all checks on staff, including agency staff and volunteers.
- Ensure that appropriate action is taken to refuse employment to any individual who may pose a risk to children or vulnerable adults.
- Ensure that risk assessments are completed for new staff that don't have a completed DBS check in place on commencement of employment.

- Notify the Local Authority Designated Officer of any allegations made against a member of staff and to instigate appropriate College HR processes where appropriate.

The BIMM Limited Board will:

- Nominate and ensure that a member of the Executive Management Team has responsibility for Safeguarding across the UK Colleges.
- Ensure that each UK College has a Designated Safeguarding Lead who is a member of the College Management Team.
- Ensure that UK colleges have the following policies and procedures in place:
 - A safeguarding policy which complies with the statutory guidance and is updated annually.
 - A staff behaviour policy which includes acceptable use of technologies, staff student relationships and communications including the use of social media.
 - Recruitment and selection policies and procedures in place which prevent people who pose a risk of harm from working with children.
- Ensure that UK Colleges contribute to inter-agency working, in line with the statutory guidance Working Together to Safeguard Children.
- Monitor safeguarding arrangements to ensure that they take into account the procedures and practices set up by the Local Safeguarding Children's Partnership.
- Ensure that there is an appropriate safeguarding response to any children who go missing from education.
- Ensure that students are taught about keeping themselves safe, in a way that is appropriate to their age and understanding.
- Ensure that any member of staff found not suitable to work with students, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring.
- Ensure that there are procedures in place to handle allegations against UK College Principals, members of staff, volunteers and students.

The Prevent Duty Lead will:

- Ensure training on the Prevent Duty for all new staff at the College as part of the probation period.
- Liaise with the Regional Prevent Duty Co-ordinator and Regional Counter Terrorism Police to discuss any concerns and make referrals as appropriate.
- Refer all Prevent Duty referrals that become part of the Channel process to the Education Skills Funding Agency (ESFA), as per the funding guidance.

3. Staff Training, Support & Supervision

All staff will receive training in child protection and safe working practice. In addition, they will receive safeguarding and child protection updates as required, but at least annually. Training will also include members of the College community not employed directly by the Institute, e.g. Security Staff.

Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities, this training will be updated annually.

When staff join the Institute, they will be informed of the safeguarding children arrangements in place. All staff will be given a copy of this policy and Part 1 of Keeping Children Safe in Education (KCSIE) 2019. All staff will receive induction in safeguarding children and will be supplied with the child protection policy; the behaviour policy; the staff behaviour policy (sometimes called a code of conduct); the safeguarding response to children who go missing from education; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). All



volunteers, supply staff and regular visitors to the Institute will be told where our policy is kept, given the name of the DSL and informed of the College's procedures in reporting concerns.

We recognise that staff working at the Institute who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will therefore support such staff by providing supervision and to seek further support such as counselling or regular supervision, as appropriate.

4. Safer Recruitment & Selection of Staff

The Institute has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the Institute's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

All staff working within the Institute who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK.

The Institute maintains a single central record of recruitment checks for audit purposes.

Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.

Volunteers who are not working in regulated activity, will always be supervised.

5. Managing Allegations against staff

We acknowledge that a student may make an allegation against a member of staff.

If such an allegation is made which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the College Principal, unless the allegation concerns the Principal, in which case the Executive Principal will be informed immediately.

The College Principal (or Executive Principal) on all such occasions will discuss the content of the allegation with Local Area Designated Officer (LADO), prior to undertaking any investigation.

The Institute will follow the DfE and Local Authority procedures on managing allegations against staff.

The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

In the event that a member of staff suspects that a student is being abused by staff of the College, a report should be made in confidence to the Head of Student Support, who will liaise in the strictest of confidence with the Head of Education and College Principal.



6. Whistleblowing

The Institute recognises that students cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Institute's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the College Principal should be raised with the Executive Principal.

Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

7. Procedure Guidelines for Dealing with Disclosures & Reporting Concerns

Any suspicion, allegation or incident of abuse must be reported to a member of the Safeguarding Team.

If any member of staff has any concerns about a learner they consider to be suffering or to be at risk of suffering significant harm, he/she must immediately contact a member of the Safeguarding Team:

Staff should not:

- Promise confidentiality.
- Ask leading questions.
- Criticise or give their views.

The staff member to whom a disclosure is made should make a full and careful written record of the alleged abuse using the Safeguarding Concern Form (available on the VLE, within the Staff Safeguarding guide and from Student Services). This should be done immediately or as soon as possible thereafter and passed to a Safeguarding Officer. The record must be kept secure and confidential. The relevant information should include:

- The date and time the allegation was made.
- Staff name and the names of others present.
- The name of the person making the allegation and, where different, the name of the child who has allegedly been abused.
- A description of any injuries observed.
- An account of the allegation.
- Any telephone report must be confirmed in writing to Social Services department within 24 hours. The confirmation may be handwritten, posted or faxed, but a copy must be kept securely on file.
- The Head of Student Support or, in their absence, Deputy Head or relevant Student Support Officer shall retain a copy of the written records and any other relevant material. These will be kept securely at all times, separate from the main student file.
- Allegations against staff will be referred to the Designated Safeguarding Lead and Human Resources.

A member of the Safeguarding Team will discuss the situation with Social Services if appropriate. This will include advice and discussion as to whether to make a formal referral for child protection. There should be no contact with parents/carers by staff – any contact must have the consent of the person disclosing and be referred via Children's Services.

Types of Concerns

Staff should ONLY discuss these types of concerns with a member of the Safeguarding Team.

- A learner discloses that they have been sexually abused in the past or is now being sexually abused.
- A learner discloses self-harm, eating disorders, or suicidal thoughts or attempts.
- A learner that they have has been physically abused in the past or is now being physically abused.
- Staff are told by another learner or parent/carer that they know a learner is being abused.
- Staff see bruises, cuts, burns or unexplained injuries that lead to suspicion of a physical injury.
- If they have any concerns about a learner's welfare or safety.

Neglect or Emotional Abuse

Members of staff often find it more difficult to know what to pass on in these circumstances. Any concerns or worries about a learner's welfare should be discussed with a member of the Safeguarding Team.

It is important that staff alert the Head of Student Support or, in their absence, the Deputy Head or relevant Student Support Officer of concerns regarding:

- Lack of adequate food, clothes or hygiene.
- Loss of weight.
- Increase in apathy.
- Excessive attention-seeking behaviour.
- Unduly aggressive behaviour.
- Self-depreciation (I'm stupid, ugly, worthless, etc).
- Extremes of passivity or aggression.
- Constant tiredness.
- Untreated medical or hygiene problems.
- No social relationships.

Suspected abuse by another student

Any form of inappropriate behaviour (such as bullying and harassment) towards students will be dealt with under the Institute's Staff/Student Disciplinary Procedure.

In the September 2019 Keeping Children Safe in Education (KCSIE) update, staff are also requested to be vigilant around issues associated with sexual violence and sexual harassment between children in schools and colleges. It is also provided clarity of managing peer-on-peer abuse and additionally physical relationships between children.

8. Children Missing from Education

A child going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.

Work around attendance and Missing from Education will be coordinated with safeguarding interventions.

BIMM must notify the Local Authority of any student who fails to attend regularly after making reasonable enquiries or has been absent without approval a continuous period of 5 days or more.

BIMM must also notify the Local Authority of any student who is to be withdrawn because:

- They have been taken out of school by their parents and is being educated outside the school system (e.g., home education)
- They have ceased to attend and no longer live within a reasonable distance (e.g. moved within the city, within the country or moved abroad but failed to notify of the change)
- Displaced as a result of a crisis e.g., domestic violence or homelessness

To ensure compliance with the above, BIMM will:

- Hold two or more emergency contact numbers for each student.
- Attendance monitoring will be conducted closely with the DSL and checked on an individual basis to ensure the safety of each student
- Demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of students that would be considered 'missing'.

9. Record Keeping

Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should have access control measures in place and be timed, dated, and signed, with name printed alongside the signature.

All records of a child protection nature will be passed to the DSL including case conference or core group minutes and written records of any concerns. Child protection records are kept securely and transferred in a safe and timely manner when a child moves school and a confirmation receipt obtained.

The DSL will maintain and regularly audit child protection records and ensure that each stand-alone file includes a chronology of significant events.

10. Information Sharing & Confidentiality

The Institute recognises that all matters relating to child protection are confidential and is fully aware of the obligations which the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) places on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The College Principal or DSL will disclose any information about a student to other members of staff on a need-to-know basis only.

All staff must have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing

practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children/vulnerable young adults. All staff must be aware that they cannot promise a child/vulnerable young adult to keep secrets which might compromise their safety or well-being.

Wherever possible Designated Safeguarding Leads will follow the principles of the GDPR, however this should not be a barrier to the effective and timely communication of information related to safeguarding information. Safeguarding information is treated as the 'special category personal data and allow for storage and sharing sensitive and personal information through secure means.

*“Whilst, among other obligations, the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is **not** a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”* KCSIE

Further guidance is available on page 19 of [this document](#).

11. Monitoring & Evaluation

It will be the responsibility of the Head of Student Support or, in their absence, the Deputy Head or relevant Student Support Officer to review and monitor the procedures and to seek the advice of the Area Child Protection Committee (ACPC) and local authority Social Services department and to bring about a change in procedures and guidelines if necessary

Our Safeguarding Children policy and procedures will be monitored and evaluated by:

- Completion of an annual safeguarding audit;
- Student surveys and questionnaires;
- Discussions with students and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the single central record of recruitment checks;
- Monitoring of logs of bullying/racist/behaviour incidents;
- Supervision of staff involved in child protection.

12. Other Relevant Policies

The Institute's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, where applicable, such as:

- Bullying & Harassment Policy & Procedure
- Cloud Data Storage Usage Policy
- Cyber & Information Security Policy
- Data Protection Policy
- First Aid & the Administration of Medicines
- Health & Safety



- Online Learning Code of Conduct
- Prevent Duty Policy
- Sexual Misconduct Policy & Procedure
- Staff Code of Conduct
- Student Charter
- Student Code of Conduct
- Student Equal Opportunities & Diversity Policy
- Student Social Media Policy & Guidelines
- Whistleblowing (Confidential Reporting)