

Safeguarding Policy

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| Purpose and Scope of this policy | <p>This policy is designed to outline our position and responsibilities and aims in relation to safeguarding. The principles of this policy apply to the Board of Trustees, all staff including senior managers and paid staff, freelancers, volunteers and anyone working on behalf of the BT/2TP.</p> <p>The BT has a duty of care to safeguard all children, young people and adults at risk in the building or involved in any of our activities, regardless of age, developmental stage, ability, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background. We are committed to providing a safe and secure environment for all.</p> | |
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References to 'Two Temple Place' or '2TP' or to 'The Bulldog Trust' or 'BT' should always also be considered references to both entities where applicable, unless otherwise explicitly stated, an exception is noted, or different treatment is required or provided for Two Temple Place or The Bulldog Trust.

The Bulldog Trust Policy & Plan for the Safeguarding of Children and Adults at Risk

Our Safeguarding Policy

This policy is designed to outline our position, responsibilities and aims in relation to safeguarding. The principles of this policy apply to the Board of Trustees, all staff, freelancers, volunteers and anyone working on behalf of BT/2TP.

The BT has a duty of care to safeguard all children, young people and adults at risk in the building or involved in any of our activities, regardless of age, developmental stage, ability, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background. We are committed to providing a safe and secure environment for all, by ensuring that all staff working on premises controlled by us adhere to these guidelines and procedures and are empowered to deal with issues relating to those people as appropriate to their role. We include under this policy all people who are vulnerable to harm through disability or disadvantage.

All staff, and especially those interacting and working with children, young people and adults at risk, are required to be vigilant at all times, to take responsibility for reporting concerns about poor practice or child abuse through the appropriate channels. We will:

- Promote and prioritise the safety and wellbeing of children, young people and adults at risk
- Ensure that all staff and volunteers understand their roles and responsibilities and are provided with information to recognise, identify and respond to signs of abuse, neglect, and other concerns
- Ensure appropriate action is taken in the event of incidents/concerns, and support is provided to anyone who raises or discloses the concern
- Ensure that confidential, detailed, accurate records of all concerns are maintained and stored
- Prevent the employment of unsuitable individuals
- Ensure robust safeguarding arrangements and procedures are in operation.

BT/2TP will promote, share and discuss this policy with staff, volunteers, and visiting artists and facilitators to promote an environment of understanding and security for participants and practitioners. The BT requires all staff, trustees and volunteers adopt and abide by this policy and procedures. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

This policy will be made available to staff and visiting artists and publicised to schools, visiting community leaders and cultural groups, partner organisations, parents/carers and young people as required. The policy will be reviewed at least every two years and agreed at Board level. Staff will be informed and trained/retrained as appropriate. The BT will collaborate fully with the statutory and voluntary authorities concerned with investigating abuse although it is important to

note that it is the responsibility of the relevant governing body, police, Social Services and NSPCC – and *not* the BT – to investigate the truth of any allegation of abuse.

What We Do to Create a Safe Environment

At BT/2TP, we sometimes work with children, young people and adults at risk through charities, schools or community groups. This means that although we are not the prime point of contact or carer for these groups, and we look to their regular support networks to provide their overall pastoral care, we still have a vital responsibility to ensure that we work in accord, harmony and sympathy with them and their regular staff, guardians or carers. Alongside that, we must be no less mindful of our own duties in terms of safeguarding, whistleblowing and care.

Where we work directly with children, young people or adults at risk in workshops or on creative projects, we aim to create an atmosphere of trust, dignity and respect where individuals are valued for their unique viewpoints and encouraged to talk and be listened to. Inclusive practice is at the heart of this work and informs its planning and delivery.

- When we work with community groups or charities we endeavour to discover the very best way to work with the organisation and its participants to understand their objectives and so make the project a unique experience.
- We ensure clear briefing with group leaders to introduce our team and their responsibilities, including the Designated Safeguarding Officer, DBS checked staff, First Aid, Mental Health First Aid and health and safety and evacuation leads and processes.
- We try to treat all participants with empathy and respect, including speaking *to* them, rather than through their group leaders wherever possible.
- We try to encourage other staff and volunteers to extend the same empathy and respect, even where people have no formal training or working relationship with group members.
- Wherever possible, we create a Quiet Space to offer respite and a safe space for project participants.

Bulldog Trust, Board of Trustees, June 2025

Date of Next Review: December 2026

Safeguarding Plan

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Contact Details

Designated Safeguarding Officer (DSO)

Rebecca Hone, 020 7836 3715 / rebecca@twotempleplace.org

The DSO works with the Director to:

- Review and update the organisation's safeguarding policy on an annual basis or as necessary
- Lead on contact with Local Authority Social Services in the event that a young person/ adult is at risk of harm
- Manage complaints about poor practice and allegations against staff or volunteers
- Refer relevant issues of safeguarding to the Board of Trustees for consideration
- Collect monitoring data on all safeguarding activities across the organisation
- Promote safeguarding across the organisation

NSPCC 24 hour helpline 0800 800 5000

Childline 24 hour helpline 0800 1111

Please note that this plan is reviewed and revised on an ongoing basis based on activities undertaken, new findings, and changes to the law or statutory requirements.

Safeguarding Plan

The Purpose of This Plan:

- To protect children, young people and adults at risk who visit BT/2TP or participate in activities with us.
- To protect children, young people and adults at risk who volunteer at BT/2TP.
- To provide staff and volunteers with the overarching principles that guide our approach to the safeguarding of children, young people and adults at risk.

Our Commitment

We will seek to keep children, young people and adults at risk safe by:

- Valuing them, listening to and respecting them.
- Adopting safeguarding practices through procedures and a code of conduct for staff and volunteers.
- Recording and storing information professionally and securely, and sharing information about safeguarding and good practice with staff and volunteers.
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately, and take allegations seriously.
- Ensuring that we provide a safe physical environment for children, young people, adults at risk, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

Staff & Safeguarding Structure

The Board of Trustees sign off policies and practices and discuss complaints or revisions to processes. Philippa Melhuish is the Lead Trustee for Safeguarding. The Director of BT/2TP has overall responsibility for the management of safeguarding in the building and in its operations, overseeing the Designated Safeguarding Officer, Rebecca Hone, and the Deputy Safeguarding Officer, Poppy Parry. They will meet biannually to review this policy and the safeguarding log maintained by the DSO and Deputy, and as issues arise. They will take advice from external sources and advisors as appropriate, including from the Local Safeguarding Children Partnership. The Director will report to the Board of Trustees whenever major safeguarding situations arise and will work with the DSOs to revise this policy with Board approval no fewer than every two years, and as statutory and legal changes occur or incidents dictate.

All staff who work with schoolchildren, community projects and adults at risk have enhanced DBS checks.

The BT staff have a responsibility to report concerns to the DSO and to use the emergency procedures immediately as they arise. Where a DSO or Deputy is unavailable and immediate action is required, the Lead Trustee for Safeguarding, Philippa Melhuish, would be the next contact. It is the responsibility of BT/2TP to

report safeguarding concerns to the relevant governing body such as the Local Safeguarding Children Partnership.

It is not the responsibility of staff (paid or voluntary) to decide whether or not abuse has taken place. However, it is the responsibility of all staff to act on any suspicion or disclosure of abuse by reporting it.

Promoting Good Practice

BT/2TP acknowledges that child abuse and abuse of adults at risk, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about taking swift and appropriate action. Abuse can occur within many situations, including but not limited to the home, school and creative or educational environments. In the development of our Community and Cultural Programmes, there may be instances when employees or volunteers have regular contact with children, young people or adults at risk, and this could make them an important link in identifying cases where they need protection. There may also be occasions when a member of BT/2TP witnesses abuse or bullying, or when a young person discloses such information to them. All suspicious cases of poor practice should be reported.

Whistle-Blowing and Complaints

BT/2TP assures all staff that it will fully support and protect anyone who in good faith reports concerns regarding a colleague's or employee's behaviour towards a child, young person or adult at risk. The BT takes complaints seriously and will enable staff to share their concerns in confidence. Any complaints made by a child, young person or adult at risk, staff, volunteer, parent or carer will be considered by BT/2TP's leadership team, observing privacy rigorously wherever possible, with reference to the Local Safeguarding Children Partnership.

Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children and adults at risk, including:

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Resources and advice available from National Society for the Protection of Cruelty to Children (NSPCC)

This policy should be read alongside our policies and procedures on:

- Health and safety
- Privacy & data protection
- Disciplinary procedures

CONDUCT

Safeguarding code of conduct

This Safeguarding Code of Conduct sets out the expectations of BT/2TP for all staff (including volunteers) who work for, or represent, the organisation in their contact with children and adults at risk.

Do:

- Approach any child, young person or adult at risk apparently in distress and ask if you can help.
- Seek assistance from colleagues or supervisors in order to minimise the amount of time you are alone with them.
- Be aware of the possible risks and question situations that you find suspicious.
- Communicate the details of any lost children to the Designated Safeguarding Officer (DSO) or Deputy as quickly as possible.
- Keep any lost children in a public area where they can be clearly seen.
- Actively contribute to an organisational culture where inappropriate behaviour is not tolerated.
- Ensure that whenever possible there is more than one adult present during activities with children, young people and adults at risk, or at least that you are within sight or hearing of others. The adult present may be a teacher, parent, carer, group leader etc.
- If a child or vulnerable adult wishes to talk to you in confidence, then try to find a quiet space in a public area where this is possible.
- Act professionally in all matters.
- Be aware of appearances and avoid any situations which might appear compromising.
- Report any concern or allegation (even if it is just a suspicion) of abuse or inappropriate conduct immediately to the DSO or Deputy.

Do not:

- Physically restrain a child, young person or adult except in exceptional circumstances (e.g. to prevent injury, damage to property, or to prevent theft) and even then, be careful to use only the *minimum* restraint necessary.
- Engage in any "rough and tumble" or other horseplay.
- Take photos or videos of children, young people or adults at risk on personal devices such as mobile phones or tablets, see note below on photographs, videos and consent.
- Make sexually suggestive comments to any visitor.
- Use foul or abusive language to any visitor.
- Give out personal information, or share email, social network site details (e.g. Facebook), and mobile phone numbers with any child, young person or adult at risk.

Do things of a personal nature for children, young people or adults at risk that they can do for themselves or that a parent / leader can do for them.

Please note that

- Photographs or videos, including those on websites must not include any participant unless authorised by the appropriate member of staff and adult / parental (for children) consent is given. This includes the use of camera phones. BT/2TP has forms which must be completed by the relevant guardian (e.g. teacher or parent) to obtain permission to photograph children, young person or adults at risk. These are available from the DSO or Deputy.
- All staff should be aware that some children and vulnerable adults may behave inappropriately. Any sanctions and approaches to discipline should in the first instance be managed by the responsible adult.

E-Safety:**a) Social Media including Instagram, Facebook, Twitter, YouTube, TikTok**

Despite their special value for communications and for inclusion, all technology carries the potential for misuse. Risks associated with user interactive services include: cyber bullying, grooming and potential abuse by online predators, identity theft and exposure to inappropriate content such as racism or pornography. Good practice guidance produced by the social media industry (Internet Advertising Bureau 6) recommends that companies should not create or sell online behavioural segments intended for the sole purpose of targeting children they know to be under 13 years.

b) Photographs and Film Footage

BT/2TP will carry out permission procedures where photographs or film footage are taken of participatory activities. These permissions will allow us to use the photos or video footage for promotional and archive purposes only. The photos will not be sold or used for commercial gain and will only be used in the promotion of BT/2TP's activities. Photos and video footage will be stored or used for up to five years unless otherwise agreed. The BT will endeavour to ensure that any photographs or film footage taken and used by the company or a third party will be taken with the permission of the participants, parents or other responsible adults as appropriate. In all cases we will not use the full name of any children, young people or adults at risk, except for professional cast members, where appropriate permissions will be sought.

c) Data of Participants and Visitors

BT/2TP follows the rules of the Data Protection Act 1998 and the General Data Protection Regulation 2018. We aim to protect files and folders, giving only DBS-registered staff access to young people's personal data, and taking only the data we need for no longer than we need it, in line with our Privacy Policy (Policy 27) and Data Protection Policy (Policy 26). We are ready to investigate breaches of security immediately they occur.

We recognise that changes in technology mean that we must be mindful of our responsibilities in this area and try to stay abreast of changes in legislation and data capture. To ensure our data sharing processes are carried out in compliance with relevant legislation (notably The Data Protection Act 1998 and The Privacy and Electronic Communications Regulations 2003) and in a way that considers the needs

and expectations of our audiences, we will ensure that companies are in a position to enter into a data sharing agreement with us, as set out in our policy. This includes a requirement to register as a Data Controller with the ICO (www.ico.org.uk). The key principles of our data protection are:

- To use data fairly and lawfully.
- To use data for limited, specifically stated purposes.
- To use data in a way that is adequate, relevant and not excessive.
- To maintain accurate data.
- To keep data for no longer than is absolutely necessary.
- To handle data according to people's data protection rights.
- To use data safe and securely.
- Not to transfer data outside the UK without adequate protection.

Supervision Guidelines

The BT will expect appropriate supervision for children and young people for group or school bookings. The following ratios required under The Children's Act 1989:

- 0 – 2 years 1 adult to 3 children
- 2 – 3 years 1 adult to 4 children
- 3 – 7 years 1 adult to 8 children

Health, Safety, Accident and Injury

The BT will record accident and incident forms for children, young people and adults at risk, regardless of whether teachers or parents/guardians are present. These may be reported through to Trustees where injuries are significant, or seen to occur repeatedly.

Managing Challenging Behaviour – Practice & Recommendations

When working with children, young people or adults at risk, staff may, on occasions, be required to deal with challenging behaviour, such as:

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

In responding to challenging behaviour, staff members' reactions should always be consistent, proportionate to the actions, imposed as soon as is practical and be fully explained to the person and their teachers/parents/carers.

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the Designated Safeguarding Officer or Deputy and record the incident. The DSO or Deputy will liaise to ensure that the parents/guardian/key worker of the person are informed, unless this puts the person in danger:

- If someone is accidentally hurt.
- If a person seems distressed in any manner.
- If a person appears to be behaving inappropriately or makes you or others feel uncomfortable.
- If a person misunderstands or misinterprets something you or someone else have done.
- If a person discloses anything to you that causes concern.
- If physical intervention is required to manage challenging behaviour.

Dealing with Disclosures and Concerns About a Child, Young Person or Adult at Risk

Anyone who suspects that a child, young person or adult at risk, is at risk of harm or abuse should take personal responsibility to act. Not doing may put them at risk of further harm. It is *not* the responsibility of The BT to investigate a child or adult safeguarding complaint but to refer concerns on to local children's or adults' social care departments or the police.

Concerns about children, young people and adults at risk may arise in different situations:

- You may witness or observe something.
- Hear it from others, in person or on the phone, by email or letter.
- Be told directly.

If you receive an allegation of abuse of a child, young person or adult at risk you should do the following:

- Ensure the welfare of the child, young person or adult at risk.
- Check your understanding of the situation, without being investigative.
- Explain that you have a responsibility to report what the child, young person or adult at risk has said to someone else.
- Report the matter as soon as possible to the DSO or Deputy who will then liaise with the relevant authorities.
- Record all the details on the safeguarding concern form.

If a disclosure or allegation is being made to you by a child, young person or vulnerable adult:

- Ensure that any medical attention needed is addressed as a priority.
- Listen to what they have to say with an open mind.
- Do not ask probing or leading questions designed to get them to reveal more.
- Check your understanding of the situation, without asking leading questions.
- Never stop a person who is freely recalling significant events.
- Make a note of the discussion as soon as possible afterwards, taking care to record the timing, setting and people present as well as what was said. Try to record the words that were actually spoken and not your own interpretation of them.

- Explain that you cannot keep such information confidential, and that you have a responsibility to report what they have said to someone else. If there is an opportunity you can tell the person who you will be passing on their concerns to. It is important to record if the person has consented to having the information shared but if the concern involves wider public interest the person's wishes may have to be overridden.

If the allegation concerns a visitor or member of the public, the DSO should consider whether there are reasonable grounds for excluding them from the site until an appropriate investigation can be carried out. In some cases, the immediate involvement of the police may be appropriate. For example, if anyone was causing harm to a child, young person or adult at risk in a public place then the involvement of the Police must be sought immediately.

If the child, young person or adult at risk is involved is part of an organised group, the DSO will consult with the group's leader and make every effort to agree an appropriate course of action. If the person involved is with a family member or other responsible adult and they are not causing any harm, the DSO will consult with this person and will make every effort to agree an appropriate course of action.

If the allegation concerns another member of staff or volunteer, the staff member must raise this matter with the DSO in confidence. If a formal investigation is deemed necessary, then this will be carried out by the Chief Executive in accordance with the Disciplinary Procedures. Depending on the nature of the allegation, The BT may be required to involve the appropriate authorities, including the police.

Appendix: Terms of Reference, Processes, Best Practice

Definitions of Abuse

There are five recognised types of abuse and BT/2TP refers to these within this policy document. We apply these definitions when addressing safeguarding, children, young people and adults at risk:

- Physical abuse: Deliberately causing physical harm or injury to a person, such as hitting, shaking, burning, or using excessive force.
- Sexual abuse: Involving or forcing someone to take part in sexual activities without their consent or understanding, including non-contact acts like grooming or sharing sexual images.
- Emotional abuse: Ongoing verbal or emotional mistreatment that harms a person's self-esteem or emotional wellbeing, such as bullying, threats, or humiliation.
- Financial abuse: The unauthorised or improper use of someone's money, property, or financial resources, often through theft, coercion, or deception.
- Neglect: The persistent failure to meet a person's basic physical, emotional, or medical needs, leading to serious harm or development issues.

There are many more forms of abuse and safeguarding concerns that we do not define here in detail, but which are part of our ongoing safeguarding discussions, as our partnerships and programmes evolve. These include, for example: child criminal exploitation, domestic abuse, online abuse, modern slavery, female genital mutilation, radicalisation, and self-harm. We regularly review these areas as part of our ongoing safeguarding practice and training.

Terms:

'Children' and 'Young People': The BT refers to 11 year olds and younger as 'children'; and twelve year olds and older as 'young people'. Young person/people should be understood as referring to children and young people under 18 years old. An adult at risk is an individual aged 18 years and over who: a) has needs for care and support (whether or not the local authority is meeting any of those needs) and; b) is experiencing, or at risk of, abuse or neglect, and; c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Abuse and neglect are forms of maltreatment. There are different types of abuse: physical, emotional, sexual, financial or neglect.

Activities refers to The BT's programme of activities available for children, young people or adults at risk. This typically (but not exclusively) includes one-off workshops, productions, work placements, talks and longer-term engagement projects.

Bullying is unwanted, aggressive behaviour that involves a real or perceived power imbalance. It may be repeated over time, and includes actions such as making threats, spreading rumours, attacking someone physically or verbally, and excluding someone from a group on purpose. Bullying is often difficult to identify and difficult to see evidence of.

Neglect is the persistent failure to meet a child, young person or adult at risk's basic physical and psychological needs, likely to result in the serious impairment of their health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a person from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

Host is used to describe an organisation or educational institution that has invited The BT to deliver learning or workshop activities for their members, students or exclusive audiences.

Visitor refers to external companies or artists coming to The BT, who are required to adhere to our Safeguarding and other policies.

Standard Disclosure is a request to the Disclosure and Barring Service (DBS) to disclose any spent and unspent convictions, cautions, reprimands, final warnings.

Enhanced Disclosure is a request to the Disclosure and Barring Service (DBS) to disclose any spent or unspent convictions included in the standard disclosure, plus any additional information held locally by police forces that is reasonably considered relevant to the post applied for.

Disclosure and Barring Service (DBS)

Under the Disclosure and Barring Service (DBS), employees and volunteers (paid or unpaid) who work directly with children/young people/vulnerable adults in the following ways will have to be checked through DBS. The definition of regulated activity covers those who, teach, train, instruct, care for or supervise children on a regular basis, and at The BT this would currently mean workshops or learning projects where they might work intensively with children or at risk adults, or might be alone with them for any period of time. Under the terms of the Disclosure and Barring Service, these activities are not recognised as regulated activity when they relate to vulnerable adults. Regulated activity relating to vulnerable adults relates to personal care (eg. dressing, toileting) and accompanying people to medical or financial appointments, none of which are carried out by The BT staff in the regular course of their work.

Allegations made against staff

It is highly advisable to follow the good practice guidelines at all times to avoid allegations of abuse. All allegations or concerns should be directed to the Director and DSO, who will liaise with NSPCC / local authority for advice. If an allegation made against a member of staff or a volunteer meets any of the following criteria, The BT will contact the Local Authority Designated Officer (LADO):

Where someone has behaved in a way that has harmed or may harm a child, young person or adult at risk.

Where someone may have committed a criminal offence against, or related to a child, young person or adult at risk.

Where someone has behaved towards a child, young person/people or adult at risk in a way that indicates they are unsuitable to work with these groups.

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.

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

- An internal disciplinary or misconduct investigation.
- A child protection investigation by Children's Services.
- A criminal investigation by the police.

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.

Record retention periods In line with Guidance contained in the Data Protection Act (1998) and the General Data Protection Regulation (2018), personal information should not normally be held for longer than six years after the subject's last contact with the authority.

Ends