Child Protection and Safeguarding Policy and Procedures - Les Enfants Terribles Theatre Company LTD.

Document Control & Approval Details

- **Approved by Company Directors:** 26th June 2018
- **Previous Update:** 27th September 2022
- **Last Full Regulatory Review:** July 2026
- **Next Review Due:** July 2027 (Annual Review)
- **Registered Address:** 29 St Mary's Rd Reigate, Surrey, RH2 7JH
- **Company Registration No:** 06597710 | **VAT No:** 163385694

Safeguarding Contacts:

- **Designated Safeguarding Lead (DSL):** Sinead O'Callaghan (sinead@lesenfantsterribles.co.uk)

1. Introduction & Organizational Scope

Les Enfants Terribles Theatre Company Ltd (LET) creates internationally renowned, innovative, and immersive theatre. Alongside live productions, the company delivers education and outreach programmes, including workshops, talks, residencies, and participatory events for children and young people.

Employment Scope Notice: Les Enfants Terribles Theatre Company Ltd **exclusively employs adult performers, creative staff, facilitators, and crew aged 18 and over**. The company does not employ child actors or performers under the age of 18. This policy governs the safeguarding duties owed by adult employees, freelancers, and volunteers toward children and young people under 18 who participate in school workshops, outreach projects, creative residencies, or attend live theatrical shows.

2. Policy Statement

Les Enfants Terribles believes that no child or young person should ever experience abuse, harm, or exploitation of any kind. We are committed to conducting creative activities in a way that keeps children safe and prioritises their welfare above all else.

All children and young people, regardless of age, disability, gender, race, religion or belief, sex, sexual orientation, or socio-economic background, have an equal right to protection from all types of harm or abuse.

To achieve this, Les Enfants Terribles will:

- Maintain a culture of vigilance, openness, and safety across all creative and workshop environments.
- Ensure all adult staff, facilitators, and freelancers are thoroughly vetted, trained, and clear on their professional boundaries.
- Work in strict partnership with schools, host venues, local authority safeguarding partners, and specialist bodies (such as the NSPCC and Local Authority Designated Officers).

3. Statutory Framework & Terminology

3.1 Statutory Legislation and Guidance

This policy complies with all relevant UK statutory guidance and legislation, including:

- **Working Together to Safeguard Children (2023)**
- **Keeping Children Safe in Education (KCSIE)** (with particular regard to visiting practitioners and school outreach)
- **Childrens Act 1989 and 2004**
- **Counter-Terrorism and Security Act 2015 (The Prevent Duty)**
- **Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)**
- **The Equality Act 2010**
- **Education Act 2002**

3.2 Terminology & Definitions

- **Child / Young Person:** Anyone who has not yet reached their 18th birthday.
- **Safeguarding:** Action taken to promote the welfare of children, protect them from harm, prevent impairment of health or development, and ensure safe and effective care.
- **Child Protection:** Part of safeguarding directed at protecting specific children who are suffering, or are likely to suffer, significant harm.
- **Designated Safeguarding Lead (DSL):** The designated senior staff member responsible for child protection strategy, advice, and referrals (Sinead O'Callaghan).
- **Regulated Activity:** Unsupervised teaching, training, instruction, care, or supervision of children carried out frequently (once a week or more often, or on 4 or more days in a 30-day period).
- **Low-Level Concern:** Any concern, doubt, or unease regarding an adult's behaviour towards a child that does not meet the harm threshold for a LADO referral, but conflicts with the company code of conduct.
- **Child-on-Child Abuse:** Abuse perpetrated by a child or young person against another child or young person (including harmful sexual behaviour, bullying, or intimidation).

4. Safeguarding Governance & Leadership Roles

Overall legal responsibility for safeguarding lies with the Senior Management Team and Company Directors. Day-to-day operational leadership is delegated to the Designated Safeguarding Lead (DSL).

Responsibilities of the DSL:

- Act as the primary point of contact for staff, freelancers, school hosts, venue managers, and local authorities regarding child welfare.
- Ensure all adult facilitators, cast members, and crew receive safeguarding inductions and hold up-to-date Enhanced DBS checks where appropriate.
- Manage disclosures, suspicions of abuse, low-level concerns, and allegations against staff.
- Liaise directly with Local Authority Designated Officers (LADO), Children's Social Care, and the NSPCC.
- Review and update this policy annually or immediately following any legislative changes.

5. Code of Conduct & Promoting Good Practice

Adult practitioners working in theatre are in a position of trust and influence. Due to the physical, expressive, and interactive nature of drama, clear professional boundaries must be maintained at all times.

5.1 Good Practice Principles

- **Always work in an open environment:** Avoid isolated, unobserved one-to-one situations with young people.

- **Host Supervision:** When delivering school workshops, ensure at least one school staff member (teacher/teaching assistant) is present in the room at all times. For LET-hosted outreach events, adhere to standard adult-to-child ratios (minimum 2 adult LET representatives present at all times where a member of a co-producer or event host team is not present).

- **Role Modelling:** Maintain exemplary professional standards; never smoke, vape, consume alcohol, or use inappropriate language in the presence of young participants.

- **Equal Respect:** Treat all young people with equal respect, recognizing individual needs, protected characteristics, and cultural backgrounds.

5.2 Physical Contact in Theatrical Practice

Physical touch in drama (e.g., stage movement, ensemble work, physical theatre techniques) must be approached with caution and explicit consent:

- **Pre-Session Briefings:** At the start of every physical workshop, facilitators must explain any planned physical contact, giving participants the choice to opt out or request alternative non-contact adaptations without judgment.

- **Verbal Explanation:** Touch must only occur openly, above the waist, and serve a clear instructional or creative purpose (e.g., explaining weight transfer in movement).

- **Prohibited Areas:** Touch involving buttocks, genitals, or chest areas is strictly prohibited under all circumstances.

5.3 Practices to Avoid and Prohibit

Always Avoid (Except Emergency)	Strictly Prohibited (Never Permitted)
Spending unobserved one-to-one time with a young person.	Physical punishment, physical discipline, or threats of violence.
Giving personal lifts or transport to young people.	Sexual, suggestive, derogatory, or discriminatory language.
Sharing personal contact details (mobile number, social media profiles).	Engaging in rough, intimate, or sexually provocative games/exercises.
Administering first aid alone without school staff/witnesses present.	Inviting young people to personal residences or overnight stays.
Making promises of secrecy regarding disclosures.	Depriving children of basic needs (food, water, toilets, changing facilities).

6. Behaviour Management & Restraint Guidelines

6.1 Managing Challenging Behaviour

Challenging behaviour should be addressed calmly, consistently, and proportionately.

- **School Workshops:** The host school/organisation retains primary legal responsibility for behaviour management. If a participant displays disruptive or unsafe behaviour, the LET facilitator should request that the accompanying school teacher manage the situation according to the school's behaviour policy.

- **LET Outreach Events:** If managing behaviour at an independent LET event, facilitators must use verbal de-escalation. If a 'time-out' is required, it must be supervised by the DSL/ Senior facilitator in an open, visible area, followed by a calm restorative discussion.

6.2 Physical Intervention & Restraint

Physical intervention is strictly a **last resort**. Adult staff/facilitators must **never** use physical intervention at host school locations (where host staff handle emergencies).

At LET-hosted events, physical intervention may only be used if reasonably necessary to prevent imminent physical injury to a child/others or serious damage to property. Any restraint must use the minimum force necessary for the shortest possible duration. Any incident involving physical intervention must be reported immediately to the DSL.

7. Low-Level Concerns Framework

To maintain a culture of openness and prevent adult misconduct from escalating, Les Enfants Terribles operates a formal **Low-Level Concerns Policy** in accordance with KCSIE guidelines.

7.1 Definition

A "low-level concern" is any concern, doubt, or unease—no matter how small—that an adult working on behalf of LET may have acted in a way that is inconsistent with the Code of Conduct, but **does not meet the threshold for a LADO referral**.

Examples include: being over-friendly with participants, having "favourites", sharing personal social media handles unintentionally, using thoughtless or inappropriate humour, or being alone behind closed doors without operational justification.

7.2 Reporting Procedure

- All staff and freelancers are required to report low-level concerns about themselves or colleagues to the DSL within **24 hours**.
- The DSL will record the concern in writing, investigate the context sensitively, and determine appropriate action (e.g., refresher training, boundary reminders, or disciplinary re-alignment).
- If cumulative low-level concerns reveal a pattern of behaviour that meets the harm threshold, the DSL will escalate the matter immediately to the Local Authority Designated Officer (LADO).

8. Child-on-Child (Peer-on-Peer) Abuse & Harmful Sexual Behaviour

Les Enfants Terribles maintains a zero-tolerance policy towards child-on-child abuse, sexual harassment, and peer bullying during workshops or participatory events.

- **Harmful Sexual Behaviour (HSB) & Sexual Harassment:** Staff must challenge and address any inappropriate peer comments, unwanted physical contact, sexualized banter, or upskirting immediately.
- **Bullying & Cyberbullying:** Intimidation, exclusionary behaviour, or abuse within workshop groups will be stopped, addressed with host teachers and recorded.
- **Action:** Concerns regarding child-on-child abuse must be reported to the DSL and shared with the school's Designated Safeguarding Lead or local Children's Social Care.

9. Safeguarding Against Radicalisation (The Prevent Duty)

Under the Counter-Terrorism and Security Act 2015, LET practitioners have a duty to protect children from the risk of radicalisation and exposure to extreme ideologies.

- Practitioners should remain alert to sudden changes in behaviour, radicalized language, or expression of extreme views during creative or discussions sessions.
- Any concerns regarding radicalisation must be reported immediately to the LET DSL, who will liaise with the host school's Prevent Lead or the local authority Prevent Officer.

10. Taking Action: Disclosures and Reporting Abuse

10.1 Handling Disclosures

If a child or young person confides in a member of staff that they are being abused or are at risk:

Key Rules for Disclosures:

1. **Remain calm** and listen carefully without showing shock or disbelief.

2. **Never promise secrecy.** Explain gently at an early stage that you must pass the information on to someone who can help keep them safe.

3. **Do not ask leading questions.** Ask open questions only if necessary to clarify (e.g., "Tell me what happened"), but do not investigate.

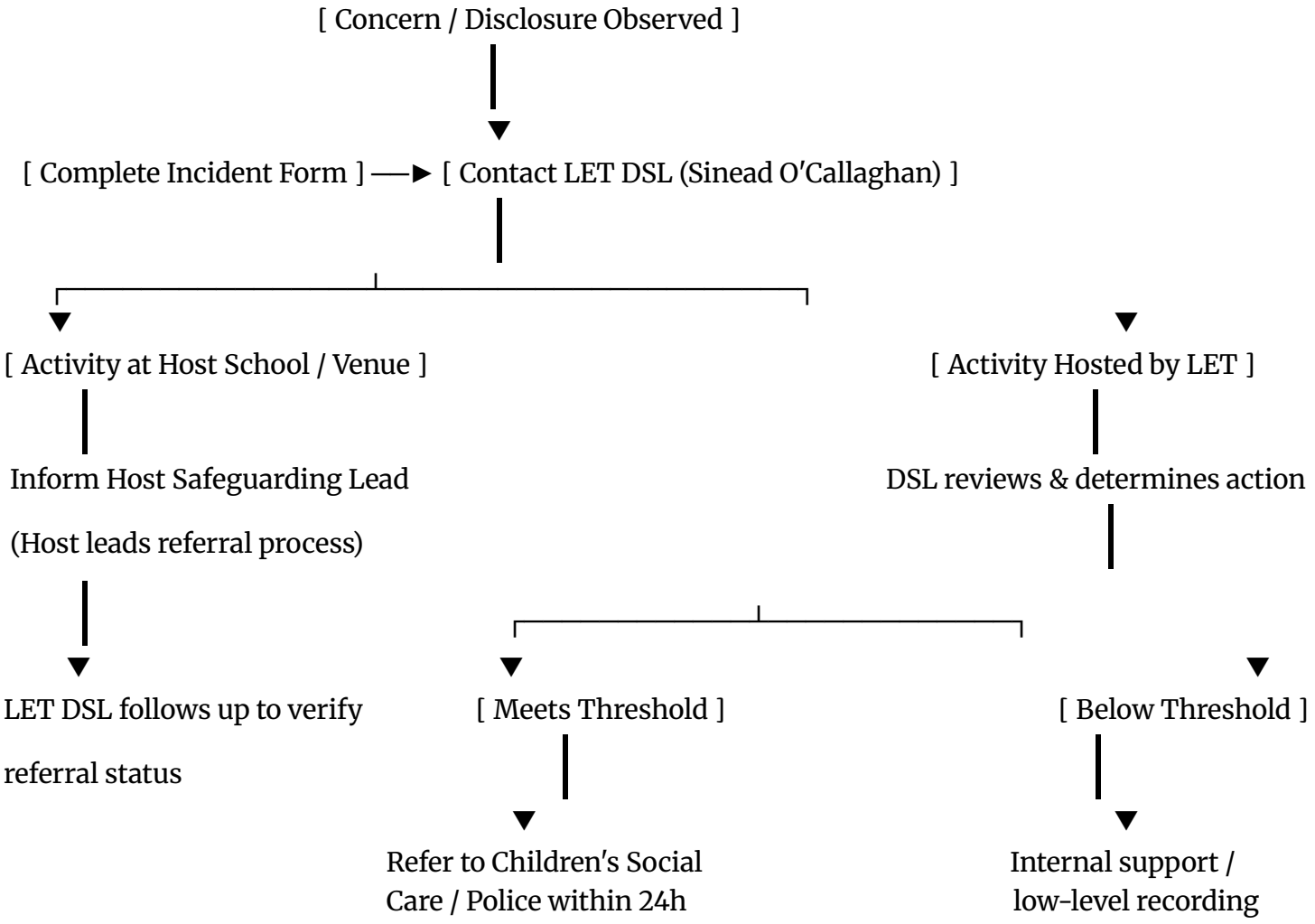
4. **Reassure the young person** that they have done the right thing in speaking up.
5. **Record immediately afterwards** using exact words, sign, date, and submit to the DSL (online if most efficient, using the click up disclosure form for internal staff - via email for facilitators)

10.2 Reporting Procedures Flowchart Overview

- **School / Host Venue Workshops:** Inform the host school's designated safeguarding contact immediately, then inform the LET DSL. The host school will lead the referral under their statutory policy.

- **LET Hosted Workshops:** The staff member reports immediately to the LET DSL. The DSL will consult Children's Social Care or the NSPCC.

- **Immediate Danger:** If a child is in immediate risk of harm, dial **999** for the Police immediately.


[Concern / Disclosure Observed]
[Complete Incident Form]
[Contact LET DSL (Sinead O'Callaghan)]
[Activity at Host School / Venue]
[Activity Hosted by LET]
Inform Host Safeguarding Lead
(Host leads referral process)
DSL reviews & determines action
LET DSL follows up to verify
referral status
[Meets Threshold]
[Below Threshold]
Refer to Children's Social
Care / Police within 24h
Internal support /
low-level recording

11. Managing Allegations Against Staff or Freelancers

Les Enfants Terribles takes any allegation against an adult employee, freelancer, or volunteer with the utmost seriousness

11.1 Harm Threshold Criteria

If an allegation indicates that an adult working for LET has:
* Behaved in a way that has harmed, or may have harmed, a child;
* Possibly committed a criminal offence against or related to a child;
* Behaved towards a child in a way that indicates they pose a risk of harm; or
* Behaved in a way that indicates they are unsuitable to work with children (including conduct outside work).

11.2 Allegation Action Steps

1. Immediate Reporting: Report the allegation immediately to the DSL. If the allegation involves the DSL, report directly to the Senior Management / Company Directors.
2. LADO Contact: Within **24 hours,** the DSL must contact the relevant Local Authority Designated Officer (LADO). No internal investigation or questioning of the accused staff member should take place prior to LADO consultation.
3. Multi-Agency Direction: The LADO will advise whether the matter requires a police investigation, Children's Social Care referral, or internal disciplinary process.
4. Suspension / Precautionary Action: Precautionary suspension may be implemented during the investigation without prejudice, following advice from the LADO.

12. Data Protection, Confidentiality & Record Retention

12.1 Confidentiality & UK GDPR

Safeguarding information is sensitive personal data. Information will be handled in line with the Data Protection Act 2018 and UK GDPR, shared only on a strictly need-to-know basis to protect the child. Data protection law is not a barrier to sharing information where it is necessary to safeguard a child.

12.2 Record Retention Schedule

In accordance with the Independent Inquiry into Child Sexual Abuse (IICSA) recommendations and UK statutory best practices:

- Child Safeguarding Records / Incident Forms: Retained securely until the child reaches 25 years of age. (or 10 years after the file is closed, whichever is longer).

- Allegations Against Staff: Detailed records of allegations that are found to be malicious or unsubstantiated will be managed per LADO advice. Substantiated allegation records are held on personnel files until the employee reaches normal retirement age, or for 10 years from the date of the allegation, whichever is longer.
- General Workshop Consent Forms:Retained for 6 years following the conclusion of the workshop project.

13. Recruitment, Vetting, and DBS Standards

Because LET facilitators and cast members work directly with children in schools and community venues, strict recruitment procedures are enforced.

- Pre-Selection Checks: New applicants must provide a full employment history, explain gaps in employment, and submit details for at least two professional references (including most recent employer).
- Enhanced DBS Checks: All facilitators, directors-in-residence, and adult staff delivering regular workshop programmes must hold an Enhanced DBS Certificate with Children's Barred List Check.
- DBS Update Service: All regular freelancers and staff are required to register with the DBS Update Service, enabling LET to perform instant annual status checks.
- Induction: Every new freelancer or staff member must complete a safeguarding induction, confirming in writing that they have read and agreed to this policy and code of conduct.

14. Media, Image Rights, and Digital Safety

14.1 Photography & Filming at Events

- Consent: Photography or video recording of under-18 participants is strictly prohibited unless explicit, signed parental/guardian consent has been obtained prior to the event.
- Equipment: Staff and freelancers must never take photos or videos of children on personal mobile phones or personal cameras. Only company-owned equipment may be used, and media must be uploaded to secure company servers immediately and deleted from temporary memory.
- Publishing Guidelines: When publishing promotional photos, young people will not be named, or first names only will be used. No personal contact details, school names, or personal identifiers will be published.

14.2 Online Workshops & Digital Communications

- Platform Security: Online workshops (e.g., via Zoom/Teams) must be hosted on password-protected company accounts.
- School Online Workshops: Must always be accessed through the host school's online platform or supervised by a school teacher in the call.
- No Direct Social Messaging: Staff must never communicate with under-18 workshop participants via personal social media accounts, messaging apps (WhatsApp), or direct messaging. All communication must go through official school contacts or parents/guardians.

15. Whistleblowing

Staff members who have concerns about safeguarding practices within Les Enfants Terribles, or who feel a concern has not been dealt with properly, are encouraged to raise the issue directly with the Directors or externally.

NSPCC Whistleblowing Advice Line: 0800 028 0285 / `help@nspcc.org.uk`

(This policy is reviewed annually by the Designated Safeguarding Lead and Company Directors to ensure full compliance with evolving statutory guidance).