

SAFEGUARDING POLICY

Children, Young People and Adults at Risk

(adopted by the Committee under Rule 41 of the Rules)

1. Statement of intent

Cody Musical Theatre Company ("the Company") is committed to safeguarding the welfare of all children, young people and adults at risk who participate in or attend its activities. The Company believes that every child, young person and adult is entitled to take part in its activities free from harm, fear and discrimination.

This Policy sits alongside Rule 37 (Safeguarding) of the Company's Rules and is one of the Policies referred to in Rule 41 (Policies). It is informed by guidance issued by the National Operatic and Dramatic Association (NODA) and the National Society for the Prevention of Cruelty to Children (NSPCC), together with the legal framework set out in section 3 below.

Safeguarding is everyone's responsibility. Every Member, Officer, member of a Production Team, member of the Committee, co-opted person, volunteer and contractor who participates in the Company's activities is bound by this Policy and must comply with it.

2. Purpose and scope

The purpose of this Policy is to:

- set out the standards of behaviour expected of all persons involved in the Company's activities;
- identify how children, young people and adults at risk are to be protected from harm;
- explain how safeguarding concerns and allegations are to be reported, recorded and responded to;
- define roles and responsibilities for safeguarding within the Company; and
- set out the recruitment, training and review requirements that support this Policy.

This Policy applies to all activities of the Company, including (without limitation) auditions, rehearsals, costume fittings, performances, social events, online communications and any other activity conducted under the name or auspices of the Company. It applies whether activities take place at the Company's usual premises, at hired venues, in private homes (where used for Company purposes), online, or elsewhere.

This Policy applies to every Member of the Company (as defined in the Rules), every Officer, every member of a Production Team, every member of the Committee, every co-opted person, every volunteer and every contractor engaged by the Company.

3. Legal and regulatory framework

The Company complies with all applicable safeguarding legislation and guidance in force from time to time, which currently includes:

- Children Act 1989 (as amended, including by the Children and Families Act 2014);
- Children Act 2004 (as amended by the Children and Social Work Act 2017);
- Working Together to Safeguard Children (statutory guidance, current edition);
- Keeping Children Safe in Education (where relevant to school-based or educational activities);
- Children and Young Persons Act 1933 and the Children (Performances and Activities) (England) Regulations 2014, governing performances by children;
- Sexual Offences Act 2003, including the offences relating to positions of trust;

- Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012;
- Crime and Policing Act 2026, including the amendment of the definition of regulated activity in force from 1 September 2026 and the statutory duty to report child sexual abuse (not yet commenced);
- Care Act 2014 (adults with care and support needs);
- Mental Capacity Act 2005;
- Equality Act 2010;
- UK General Data Protection Regulation and Data Protection Act 2018; and
- Disclosure and Barring Service rules and current eligibility criteria.

Where any provision of this Policy is inconsistent with the law in force from time to time, the law prevails and this Policy is to be read accordingly. The Committee will update this Policy promptly upon material changes to the legal or regulatory framework.

4. Key definitions

In this Policy, terms defined in the Company's Rules have the same meaning. The following further terms apply:

Child / young person — a person under the age of 18. "Children" and "young people" are used interchangeably and include Junior Members and Student Members who are under 18.

Adult at risk — a person aged 18 or over who has needs for care and support (whether or not those needs are being met), is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves (Care Act 2014, section 42).

Designated Safeguarding Officer ("DSO") — the person appointed by the Committee under Rule 37 of the Rules to act as the principal point of contact for safeguarding matters.

Deputy Designated Safeguarding Officer ("Deputy DSO") — a person appointed by the Committee to act in place of the DSO when the DSO is unavailable, conflicted, or the subject of a concern.

LADO — the Local Authority Designated Officer responsible for receiving allegations against adults who work with children.

Disclosure — information given by a child, young person or adult that suggests they may have been, are being, or are at risk of being abused or harmed.

Safeguarding incident — any incident or pattern of behaviour that gives rise to a safeguarding concern.

Regulated activity — has the meaning given by the Safeguarding Vulnerable Groups Act 2006 as amended by the Crime and Policing Act 2026, and is described further at section 6.

Abuse — the types of abuse recognised by this Policy are described in section 17.

5. Roles and responsibilities

5.1 The Designated Safeguarding Officer

The Committee shall designate a member to act as the Designated Safeguarding Officer (Rule 37). The DSO:

- is the first point of contact for any safeguarding concern, allegation or disclosure;
- maintains a confidential safeguarding log of concerns, disclosures, decisions taken, referrals made and outcomes;
- liaises with the Local Authority Designated Officer (LADO), Children's Services, Adult Social Care, the Police and other external agencies as appropriate;
- determines, before each production, which roles fall within regulated activity for the purposes of section 6, and confirms that the required certificates are held;
- ensures that all persons within scope of this Policy are aware of how to raise concerns;
- provides safeguarding induction information to new Members, Officers and Production Team members;
- holds and manages the medical and allergy forms collected under section 15A;

- attends appropriate safeguarding training and refresher training, paid for by the Company;
- reports to the Committee at each meeting on safeguarding matters (anonymised where required); and
- presents an annual safeguarding report to the Annual General Meeting.

The name and contact details of the current DSO shall be published on the Company's website and included in induction materials for new Members.

5.2 Deputy Designated Safeguarding Officer

The Committee shall, wherever possible, appoint a Deputy DSO. The Deputy DSO acts in place of the DSO when:

- the DSO is unavailable;
- the DSO has a conflict of interest in relation to a concern; or
- the concern relates to the DSO personally.

5.3 The Committee

The Committee, in its capacity as charity trustees of the Company (Rule 8), is ultimately responsible for safeguarding within the Company. The Committee shall:

- appoint the DSO (and where possible the Deputy DSO) at each Annual General Meeting;
- ensure that this Policy is implemented and complied with;
- review this Policy at least annually and after any significant safeguarding incident, and record each review in the version control table on the first page;
- receive and minute the DSO's determination of regulated activity roles before each production under section 6;
- ensure that adequate funds are available for DBS checks, training and any other safeguarding requirements;
- act on the recommendations of the DSO; and
- support the DSO in carrying out their duties.

5.4 All Members and other persons within scope

Every person within the scope of this Policy must:

- read, understand and comply with this Policy;
- act in the best interests of children, young people and adults at risk at all times;
- report any safeguarding concern to the DSO without delay;
- co-operate with any investigation conducted under this Policy; and
- complete any safeguarding training required of them by the Committee.

6. Safer recruitment and DBS checks

The Company applies safer recruitment principles to roles that involve regular or substantial contact with children, young people or adults at risk. This includes (but is not limited to):

- Officers and members of the Committee;
- the DSO and Deputy DSO;
- members of any Production Team where Junior Members or Student Members under 18 are involved;
- chaperones for child performers;
- any Member or volunteer in a position of authority or responsibility over Junior Members, including backstage, technical, wardrobe and front-of-house personnel who supervise or care for performers under 18.

Where a role meets the eligibility criteria for an Enhanced Disclosure and Barring Service (“DBS”) check under the Police Act 1997 and associated regulations, the person carrying out the role must hold a current Enhanced DBS Certificate that includes a check against the children’s barred list (and the adults’ barred list where relevant).

A role falls within regulated activity with children where the person teaches, trains, instructs, cares for or supervises children on more than three days in any period of 30 days, or overnight. From 1 September 2026, supervision of that person by another adult does not remove the role from regulated activity. Every person engaged in regulated activity with children in the course of the Company’s activities must hold a current Enhanced DBS Certificate that includes a check of the children’s barred list; an Enhanced Certificate without barred list information is not sufficient.

Before the first rehearsal of each production, the Production Team shall provide the DSO with a schedule of every adult expected to have contact with performers under 18, showing the number of days of contact anticipated. The DSO shall determine which roles fall within regulated activity and shall confirm to the Committee that the required certificates are held. The determination and the confirmation shall be recorded in the minutes.

The Company:

- seeks two written references for persons taking up roles within scope;
- requires self-disclosure of any relevant criminal convictions, cautions or safeguarding concerns;
- renews DBS checks every three years (or more frequently where required by law or by an external body whose accreditation the Company relies on); and
- treats all DBS information as confidential and stores it in accordance with the Company’s privacy notice and Disclosure and Barring Service guidance.

A person who is barred from working with children or with adults at risk under the Safeguarding Vulnerable Groups Act 2006 must not be appointed to, or continue in, any role within the scope of this section. The Company will refer to the Disclosure and Barring Service where a referral duty arises.

7. Code of conduct

All adults involved in the Company’s activities are expected to act as positive role models. The following standards apply, in particular when working with children, young people or adults at risk:

- treat every person with respect, dignity and fairness;
- use appropriate language and behaviour at all times;
- maintain professional boundaries; do not develop inappropriate personal relationships;
- avoid being alone in an enclosed or private space with a child or adult at risk; operate on a “two-adult” basis wherever possible;
- do not initiate private contact with a child or young person through personal social media, telephone or messaging;
- do not offer or give personal gifts, money or favours to a child or young person;
- do not give a child or young person a lift in a vehicle without the prior written consent of their parent or guardian and, wherever possible, the presence of another adult;
- do not photograph or record a child or young person on a personal device;
- avoid physical contact except where it is necessary for the activity (for example, demonstrating a dance move), and only with the consent of the person concerned;
- never use, possess, or be under the influence of alcohol or illegal drugs when responsible for the supervision of children, young people or adults at risk;
- challenge inappropriate behaviour by others and report it to the DSO; and
- never promise to keep a disclosure of abuse confidential.

7A. Dignity, privacy and gender identity

The Company treats every person with dignity and respect regardless of sex, gender identity or gender reassignment, consistent with the Equality Act 2010 and with section 7 of this Policy.

Arrangements for changing, supervision, accommodation and the allocation of facilities shall respect the identity and the privacy of the person concerned and of others. Where the standard arrangements would not meet a young person's needs, the Production Team shall agree individual arrangements in advance with the young person and their parent or guardian, in consultation with the DSO, ensuring privacy for that person and for every other person affected. Such arrangements shall be recorded and shall not be varied without further consultation.

No person shall be required to disclose their gender history. Any information disclosed is confidential and shall be handled in accordance with section 22.

8. Auditions

Auditions are governed by Rules 21 and 22 of the Company's Rules. In addition, the following safeguarding standards apply:

- a parent or guardian of any auditionee under 18 is entitled to be present at the audition venue (in a waiting area where seating is provided);
- no auditionee under 18 shall be in an audition room alone with a single adult; at least two adults of the Selection Board (or a parent/guardian) shall be present at all times;
- audition rooms shall, wherever practicable, have a window or open door to a public area;
- private feedback to an auditionee under 18 shall be given in the presence of another adult or the auditionee's parent or guardian;
- the Board Chairman is responsible for ensuring that audition arrangements comply with this Policy.

9. Rehearsals

Rehearsals are controlled in accordance with Rule 24. The following additional standards apply:

- at least two adults (one of whom is a member of the Production Team or a person appointed by the Committee) shall be present at any rehearsal attended by Junior Members or Student Members under 18;
- an attendance register shall be kept at every rehearsal involving Junior Members;
- Junior Members shall be signed in by, and handed over to, their parent or guardian (or a person nominated in writing by their parent or guardian);
- the Production Team shall agree procedures in advance for late collection of Junior Members, including which adults remain on site, where the child waits, and at what point the police or Children's Services are contacted;
- rehearsals involving Junior Members shall finish at a reasonable hour, taking account of the child's age and the law on performances and activities by children.

10. Costume fittings and changing

Costume fittings and changing involve a heightened risk of harm and require particular care:

- a parent or guardian shall be invited to be present for any costume fitting involving a person under 18;
- an adult shall be present at any fitting involving a Junior Member, and the young person may request that the adult present be of a particular sex or gender; where such a request is made it shall be accommodated so far as practicable, and section 7A applies;
- private and respectful environments shall be used (closed cubicles or screens where appropriate);
- photographs of any kind are prohibited in changing areas, with or without consent;
- adults shall not enter areas being used by Junior Members for changing without announcing themselves and only with another adult present.

11. Backstage, dressing rooms and facilities

- separate dressing rooms shall be provided for adults and persons under 18 wherever practicable;
- where the venue does not permit fully separate provision, screened-off areas shall be used and adult supervision arranged in accordance with sections 7A and 10;
- toilet and washing facilities designated for the use of persons under 18 shall be separate from those used by adults wherever the venue permits;
- where fully separate provision is not possible, facilities shall be allocated to performers under 18 for defined periods, signed accordingly, and supervised at the entrance by a chaperone; no adult shall use a facility while it is allocated to and in use by children;
- the arrangements for separate changing and toilet provision at each venue shall be confirmed by the Production Team in writing to the DSO before the first rehearsal at that venue, and recorded;
- a chaperone for child performers (see section 15) is responsible for the welfare and supervision of those performers backstage;
- photography and video recording in backstage, dressing room, changing and toilet areas are prohibited absolutely, with or without consent; no personal electronic device of any kind shall be used, or removed from a bag or pocket, in any such area;
- adults shall not enter dressing rooms used by performers under 18 without first knocking and announcing themselves, and shall not enter alone.

12. Choreography and physical contact

Some choreography and stage direction requires physical contact between performers, or between a Production Team member and a performer. The following applies:

- the purpose and nature of any physical contact shall be explained clearly to the performer before it occurs;
- the consent of the performer shall be obtained; for performers under 18, the consent of the parent or guardian shall also be sought where the contact is more than incidental;
- an additional adult shall be present during the teaching of any choreography involving physical contact with a Junior Member;
- contact shall be limited to what is necessary for the activity and shall be appropriate to the age and maturity of the performer;
- any performer may decline physical contact, and an alternative shall be sought.

13. Transport

Responsibility for transporting children and young people to and from the Company's activities rests with their parents or guardians. The Company does not provide transport for Junior Members as a routine matter. Where transport by a Member or volunteer is unavoidable:

- the prior written consent of the parent or guardian shall be obtained;
- a second adult shall be present in the vehicle wherever possible;
- the driver shall hold appropriate insurance and a valid driving licence;
- the journey shall be direct, with no unscheduled stops at private premises.

14. Photography, recording and social media

Images, video and audio recordings of children, young people and adults at risk may only be made and used with appropriate consent. The following applies:

- written consent shall be obtained from a parent or guardian for any photograph, video or recording of a person under 18 made by or for the Company, including at auditions, rehearsals, performances and social events (see also Appendix B);
- only an official photographer or videographer authorised by the Production Team and the DSO may take photographs or recordings at the Company's events;

- photography and recording in changing areas, dressing rooms and toilets are prohibited absolutely, with or without consent;
- personal mobile devices shall not be used to photograph or record any Junior Member or any adult at risk taking part in the Company's activities;
- official Company social media accounts shall be administered by adults appointed by the Committee; no Member shall post images of a Junior Member without the consent of the parent or guardian;
- Members and volunteers shall not befriend, follow or initiate direct messaging with a Junior Member through personal social media; Company-wide group communications via official channels are permitted;
- a parent or guardian may at any time withdraw consent to the use of images of their child, and the Company shall remove such images from its current channels on reasonable notice.

15. Child performance licences and chaperoning

Performances involving children are regulated by the Children and Young Persons Act 1933 and the Children (Performances and Activities) (England) Regulations 2014. The Company shall comply with the requirements of those regulations in respect of every performance involving persons under the compulsory school leaving age.

In particular, the Company shall:

- obtain from the Production Team, before the first rehearsal, a schedule of every performer under 18 showing their full date of birth, so that licensing obligations can be determined;
- apply for a child performance licence from the local authority in which the child resides, where required, in good time before the first performance;
- where appropriate and available, apply for a Body of Persons Approval (BOPA) from the local authority in which performances are to be held;
- ensure that every child performer is supervised by a chaperone licensed by their local authority, or by their own parent or guardian where the law permits;
- comply with statutory restrictions on hours of attendance, daily and weekly maxima, rest breaks, supervision ratios and continuity of education during a performance run;
- maintain records of child performance licences, chaperone details and hours worked, and produce these to the local authority on request.

Chaperones shall be appointed by the Production Team in consultation with the DSO and shall hold a current chaperone licence and an Enhanced DBS check including a check of the children's barred list. The chaperone-to-child ratio shall be at least 1:12, or such other ratio as the local authority requires.

A chaperone is responsible for the welfare of the children in their charge and acts in place of the parent. Where a chaperone is not satisfied that the conditions in which a child is required to rehearse or perform are safe or suitable, the chaperone shall raise the matter with the Production Team; and where the matter is not remedied, the chaperone shall not allow the child to continue and shall report the matter to the DSO the same day. No person shall instruct or pressure a chaperone to permit a child to continue in such circumstances.

Chaperones, and any other adult responsible for the supervision of performers under 18, shall not use, or have visible, any personal electronic device (including mobile telephones, smart watches, tablets and cameras) at any time while children are in their charge. Devices shall be carried switched to silent and kept out of sight. This prohibition applies absolutely in changing rooms, dressing rooms and toilet areas, where no device shall be used or removed from a bag or pocket for any purpose.

For each rehearsal and performance the Production Team shall nominate one telephone for emergency use and shall identify its holder to the chaperone team and to the DSO. Nothing in this section prevents the holder of the nominated telephone from using it to summon assistance or to make a report under section 19.

15A. Medical information, allergies and first aid

A medical and allergy form in the form of Appendix C shall be completed by the parent or guardian of every performer under 18 before that performer's first rehearsal, recording allergies and intolerances, medical conditions, current medication, and two emergency contacts. A performer for whom no form has been received shall not take part until it is provided.

Any allergy capable of causing a severe or life-threatening reaction shall be notified by the DSO to every chaperone and to the Production Team before the first rehearsal, and shall be recorded on the chaperone group's working record. Where a performer carries adrenaline auto-injectors or other emergency medication, its location shall be known to every chaperone on duty, it shall be kept immediately accessible and never locked away, and it shall travel with the performer between the dressing room and the stage.

No food or drink shall be provided to a performer under 18 by the Company, or by any Member acting in connection with the Company's activities, without first checking the allergy record. Members shall not offer their own food to performers under 18.

At every rehearsal and performance at which performers under 18 are present, a named first aider and the location of the first aid kit shall be identified to the chaperone team. Any injury, illness or administration of medication shall be recorded in an accident and incident book and the parent or guardian informed the same day.

Medical and allergy forms contain special category health data. The DSO is the custodian; the forms shall be held securely, disclosed only to those who need them to keep the performer safe, and destroyed within six weeks of the final performance of the production for which they were collected, in accordance with section 22.

16. Safeguarding adults at risk

Adults at risk are entitled to the same protection from abuse and neglect as children. The Company adopts the six principles of adult safeguarding set out in the Care Act 2014 statutory guidance:

- Empowerment — personalised support and informed consent;
- Prevention — acting before harm occurs;
- Proportionality — the least intrusive response appropriate to the risk;
- Protection — support and representation for those in greatest need;
- Partnership — working with local agencies and the person at risk;
- Accountability — transparency in safeguarding practice.

Where a Member, applicant or other person involved in the Company's activities is or may be an adult at risk, the Company shall take reasonable steps to ensure their participation is safe and that any care or support needs are accommodated as far as practicable. Where mental capacity to consent is in doubt, the principles of the Mental Capacity Act 2005 apply.

Safeguarding concerns involving adults at risk shall be reported to the DSO and, where appropriate, referred to the local authority's Adult Social Care team.

17. Recognising abuse

This section sets out the principal categories of abuse recognised by this Policy. The list is not exhaustive. Concerns should be reported even where the type of abuse is not certain or does not fall neatly within any one category.

17.1 Abuse of children and young people

- Physical abuse — hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm;
- Emotional abuse — persistent emotional maltreatment causing severe and persistent adverse effects on emotional development;
- Sexual abuse — forcing or enticing a child to take part in sexual activities, contact or non-contact, including online;
- Neglect — persistent failure to meet a child's basic physical and/or psychological needs;

- Bullying — deliberate hurtful behaviour repeated over time, including online (cyberbullying);
- Online abuse — abuse perpetrated through digital channels, including sharing of indecent images, sexual exploitation and grooming;
- Grooming — building an emotional connection with a child to gain their trust for the purposes of abuse or exploitation;
- Peer-on-peer abuse — abuse between children, including bullying, sexual violence and sexual harassment;
- Female genital mutilation; forced marriage; “honour”-based abuse; child trafficking and modern slavery; radicalisation; child criminal exploitation; child sexual exploitation.

17.2 Abuse and neglect of adults at risk

- Physical abuse;
- Sexual abuse;
- Psychological or emotional abuse;
- Financial or material abuse;
- Neglect and acts of omission;
- Discriminatory abuse;
- Organisational abuse;
- Domestic abuse;
- Modern slavery;
- Self-neglect.

Indicators of abuse vary widely. Common signs include: unexplained injuries; sudden behavioural change; withdrawal; fearfulness around specific persons; reluctance to attend; signs of self-harm; sexualised behaviour inappropriate to age; reports from the person themselves or from others. Any indicator should prompt consideration of whether there is a safeguarding concern.

18. Responding to a concern or disclosure

Any person who receives a disclosure of abuse, or who has a concern about the welfare of a child, young person or adult at risk, shall follow the steps below.

18.1 If a person discloses abuse to you

- Listen calmly and attentively. Do not interrupt, do not press for details, and do not ask leading questions.
- Take what is said seriously. Do not express shock, doubt or anger.
- Reassure the person that they have done the right thing by telling you, that you believe them, and that what has happened is not their fault.
- Do not promise confidentiality. Explain that you will need to pass the information on to keep the person safe, but only to those who need to know.
- Do not investigate, do not interview, and do not contact the alleged perpetrator.
- As soon as possible after the conversation, and ideally within 24 hours, make a written record of what was said using the person’s own words where possible, on the form at Appendix A. Include the date, time, place, who was present, and any visible injuries or other observations. Sign and date the record.
- Report to the DSO without delay and pass the written record to them.

18.2 If you have a concern but no disclosure

If you observe behaviour, signs or circumstances that cause you concern about a child, young person or adult at risk:

- make a written note of what you have seen or heard, with date, time and place;

- report to the DSO without delay;
- preserve any physical evidence (e.g. messages, images) without alteration;
- do not approach or accuse any individual.

18.3 Emergency action

Where there is an immediate risk to life or limb, call the emergency services on 999 first, then inform the DSO. Do not wait to consult anyone before calling 999 in an emergency.

19. Reporting pathways

Concerns and disclosures are reported as follows:

19.1 Internal reporting

- First report: to the DSO, by telephone or in person where possible, supported by a written record.
- If the DSO is unavailable, or the concern relates to the DSO, report to the Deputy DSO.
- If neither the DSO nor the Deputy DSO is available or appropriate, report to the Chairman of the Company.
- The DSO assesses the concern and decides what further action is needed, including whether to make an external referral.

19.2 External referral

The DSO (or, where the DSO is conflicted, the Deputy DSO or the Chairman) is responsible for making external referrals. Referrals are made to:

- the Local Authority Designated Officer (LADO) for any allegation against an adult who works with children;
- the local authority Children's Services for child protection concerns;
- the local authority Adult Social Care team for adult safeguarding concerns;
- the Police, where a criminal offence may have been committed, or where there is an immediate risk to safety;
- the NSPCC Helpline (0808 800 5000) for advice and support;
- the Disclosure and Barring Service, where a referral duty arises in relation to a Member or volunteer.

19.3 Independent reporting

Any person concerned about a child, young person or adult at risk may make a report directly to external agencies without first going through the DSO. The Company supports and protects any person who reports in good faith, whether internally or externally.

19.4 Statutory duty to report child sexual abuse

The Crime and Policing Act 2026 creates a statutory duty on persons engaged in regulated activity with children to report child sexual abuse of which they are made aware, and an offence of preventing another person from making such a report. That duty is not yet in force. On its commencement this Policy shall be amended to give effect to it, and the Committee shall ensure that all persons in regulated activity are informed of what the duty requires. Nothing in this section reduces the obligation to report to the DSO without delay under section 19.1, or the right to report directly to an external agency under section 19.3.

20. Allegations against Members, Officers or volunteers

Allegations that a Member, Officer, member of a Production Team, member of the Committee, co-opted person, volunteer or contractor has harmed, may have harmed, or poses a risk of harm to a child, young person or adult at risk are taken extremely seriously.

On receipt of such an allegation, the DSO shall:

- record the allegation in writing;
- inform the LADO within one working day where the person is in a role involving children;

- inform the Police where a criminal offence may have been committed;
- inform the Chairman of the Company, who shall convene the Committee where required;
- take steps to safeguard any person who may be at risk pending external investigation;
- consider whether the person against whom the allegation is made should be temporarily suspended from any role involving children, young people or adults at risk, under Rule 26 of the Rules or otherwise.

The Company shall follow the directions of external agencies (Police, LADO, Children's Services, Adult Social Care) and shall not conduct its own investigation in parallel with those agencies. Internal disciplinary action under Rule 26 may follow once external investigation is complete, or earlier if external agencies confirm there is no objection.

Confidentiality shall be maintained so far as is consistent with the safeguarding of any person at risk and the requirements of external agencies. The identity of the person who raised the allegation shall not be disclosed unnecessarily.

21. Whistleblowing

Any person within the scope of this Policy who is concerned about the conduct of another person (including a senior officer of the Company), or about a failure to comply with this Policy, may raise that concern through the channels in section 19, or by going directly to an external agency (LADO, NSPCC, Police or local authority).

The Company will not subject any person to detriment for raising a safeguarding concern in good faith. Any retaliation against a person who has raised a concern in good faith is itself a serious matter to be dealt with under Rule 26 of the Rules.

22. Record-keeping and confidentiality

The DSO maintains a confidential safeguarding log of all concerns, disclosures, decisions, referrals and outcomes. The log is held securely, separately from general membership records, and is accessible only to the DSO, the Deputy DSO and, where appropriate, the Chairman of the Company.

Personal data is processed in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Company's privacy notice (Rule 36). Safeguarding records are retained for so long as is necessary for safeguarding purposes and in accordance with current guidance, and at least until any subject has reached the age of 25 (or longer where the matter is unresolved or where a longer period is required by law).

Medical and allergy forms collected under section 15A are held separately from the safeguarding log, and are destroyed within six weeks of the final performance of the production for which they were collected.

Information is shared on a strict need-to-know basis. Information may be shared without the consent of the data subject where it is necessary to protect a child, young person or adult at risk from harm.

23. Bullying and harassment

The Company does not tolerate bullying or harassment in any form, whether between Members, between adults and children, between performers, between members of Production Teams or otherwise. Bullying and harassment include verbal, physical, written and online conduct.

Any person experiencing or witnessing bullying or harassment should report it to the DSO. Persistent or serious bullying may be addressed under Rule 26 of the Rules (Expulsion of Members) in addition to this Policy.

24. Online safety

- All online communications between the Company and Junior Members shall take place through official Company channels (such as a designated email address or moderated group) administered by adults appointed by the Committee.
- Adults shall not initiate or accept private one-to-one online communication with a Junior Member outside official channels.

- Where online rehearsals or meetings involving Junior Members are held, a parent or guardian shall be invited to be present or available, and at least two adults from the Company shall be on the call.
- Recording of online meetings involving Junior Members may take place only with the prior written consent of each participant (or their parent or guardian) and shall be retained only for the purpose for which consent was given.
- The Company's official social media presence is administered in accordance with section 14.

25. Training

The Company supports safeguarding training as follows:

- the DSO and Deputy DSO shall complete safeguarding training at a level appropriate to their role, refreshed at least every two years;
- members of the Committee and Production Teams working with Junior Members shall complete basic safeguarding awareness training (online or in person), refreshed at least every three years;
- chaperones shall be briefed on this Policy, and in particular on sections 11, 15 and 15A, before the first rehearsal at which they are on duty;
- safeguarding induction information shall be given to every new Member and recorded;
- the costs of required safeguarding training are met by the Company.

26. Review of this Policy

This Policy shall be reviewed:

- at least once every twelve months, by the Committee, on the recommendation of the DSO;
- promptly following any significant safeguarding incident or near-miss;
- promptly following any material change in law, statutory guidance or recognised good practice;
- promptly following any material change in the Company's activities.

Changes to this Policy shall be made by the Committee in accordance with Rule 41 of the Rules. The current version shall be published on the Company's website and available to any Member on request.

Each review shall be recorded in the version control table on the first page of this Policy and minuted, whether or not the review results in amendment. A review that results in no change shall be recorded as such.

27. Contacts and resources

The contacts in this section should be kept current; the DSO is responsible for ensuring local authority numbers are accurate.

27.1 Internal contacts

- Designated Safeguarding Officer: [name, telephone, email]
- Deputy Designated Safeguarding Officer: [name, telephone, email]
- Chairman of the Company: [name, telephone, email]

27.2 External contacts

- Emergency Services: 999 (immediate risk to life or limb)
- Police (non-emergency): 101
- NSPCC Helpline: 0808 800 5000 (adults concerned about a child); help@nspcc.org.uk
- Childline: 0800 1111 (children) — also available online at childline.org.uk
- Local Authority Designated Officer (LADO): [insert local authority contact]
- Children's Services (local authority): [insert local authority contact]
- Adult Social Care (local authority): [insert local authority contact]

- Disclosure and Barring Service: 0300 0200 190; gov.uk/dbs
- Care Quality Commission: 03000 616161 (in respect of regulated adult care services)

27.3 Guidance referenced

- NODA Safeguarding guidance for member societies (current edition)
- NSPCC Learning resources for organisations working with children (nspcc.org.uk/learning)
- Working Together to Safeguard Children (current statutory guidance)
- Care and Support Statutory Guidance issued under the Care Act 2014
- Regulated activity with children: removal of the supervision exemption (Home Office / DBS guidance, September 2026)

Appendix A — Safeguarding Concern Reporting Form

Use this form to record a safeguarding concern or disclosure. Pass it to the Designated Safeguarding Officer as soon as practicable, and in any event within 24 hours. Mark the envelope STRICTLY CONFIDENTIAL.

Your name (person making the report)

Your role in the Company

Date and time of the concern or disclosure

Location

Name(s) and age(s) of the person(s) the concern relates to

Name(s) of any other person involved

Description of what was said, seen or heard (use the person's own words where possible; continue on a separate sheet if needed)

Action you took at the time

Names of witnesses (if any)

Have you informed any other person? If so, who and when?

Your signature

Date submitted to DSO

FOR DSO USE ONLY

Date received

Assessment of risk

Action taken (internal)

External referrals made (LADO / Children's Services / Adult Social Care / Police / NSPCC / DBS)

Outcome / further action

DSO signature

Date

Appendix B — Photography and Recording Consent Form (persons under 18)

This form should be completed by the parent or guardian of any person under 18 who is taking part in the Company's activities. Consent given here applies for the duration of the production for which the child is selected, and may be withdrawn at any time by written notice to the Company.

Child's full name

Date of birth

Parent / guardian's full name

Relationship to child

Parent / guardian's contact details

I consent (please tick those that apply):

- ☐ to photographs of my child being taken at the Company's rehearsals and performances by an official photographer appointed by the Company;
- ☐ to those photographs being used in the Company's programmes, displays at the venue, and printed publicity material;
- ☐ to those photographs being used on the Company's official website and official social media accounts;
- ☐ to my child being filmed or recorded for the Company's archive and rehearsal review purposes;
- ☐ to my child being filmed or recorded for inclusion in publicly available promotional material;
- ☐ to my child's first name being used in the programme and online captions (no surname will be used unless separately consented to).

I confirm that I have read the Company's Safeguarding Policy, in particular section 14 (Photography, Recording and Social Media), and understand how images of my child will be used and stored.

Signature of parent / guardian

Date

Appendix C — Medical and Allergy Form (performers under 18)

This form must be completed by the parent or guardian of every performer under the age of 18 and returned to the Designated Safeguarding Officer before the performer's first rehearsal. A performer for whom no completed form has been received may not take part. If any information changes during the production, tell the Designated Safeguarding Officer at once and complete a replacement form.

1. Performer

Full name

Date of birth (day / month / year — please give the full date, not the age)

Production and role

School or college attended

2. Parent or guardian

Name

Relationship to performer

Address

Telephone (mobile)

Email

3. Emergency contacts

Please give two contacts who will be reachable throughout rehearsals and performances.

First contact — name, relationship, telephone

Second contact — name, relationship, telephone

GP name and surgery, and surgery telephone

4. Allergies

List every allergy, including food, medication, latex, insect stings and animals. If there are none, write "none".

Allergen

What happens (describe the reaction)

How severe is it, and how quickly does it develop

Treatment required, and by whom

Continue on a separate sheet if there is more than one allergy, and tick here if you have done so: ☐

5. Severe allergy and emergency medication

Does the performer carry an adrenaline auto-injector (for example EpiPen, Jext, Emerade)?

- ☐ No
- ☐ Yes — please complete the rest of this section

Brand and dose

Expiry date

Where it will be kept during rehearsals and performances

Does the performer carry a written allergy action plan? If so, please attach a copy.

Emergency medication is never locked away. It stays with the performer between the dressing room and the stage and every chaperone on duty is told where it is.

6. Medical conditions

Tick any that apply and give details below.

- ☐ Asthma
- ☐ Epilepsy or seizures
- ☐ Diabetes
- ☐ Heart condition
- ☐ Fainting or dizziness
- ☐ Anxiety, panic attacks or other mental health condition
- ☐ Other (give details)

Details, including anything that could be triggered by heat, noise, strobe lighting, haze or smoke effects, late finishes or long periods standing

7. Medication during rehearsals and performances

Name of medication

Dose and time it must be taken

Who will administer it (the performer, a chaperone, or a parent attending)

Where a chaperone is asked to hold or administer medication, this must be agreed in advance with the Designated Safeguarding Officer and recorded.

8. Dietary requirements

Please distinguish between an allergy (section 4) and a dietary preference or intolerance.

Dietary requirements or intolerances

9. Any other needs

Mobility, sensory, communication or additional needs the chaperone team should know about

10. Declaration

I confirm that the information given is complete and correct. I will tell the Designated Safeguarding Officer at once if it changes. I consent to this information being shared with the chaperone team, the Production Team and medical personnel so far as is necessary to keep the performer safe. In an emergency, and if I cannot be contacted, I consent to the performer receiving such emergency medical treatment as a qualified practitioner considers necessary.

Signed (parent or guardian)

Name in capitals

Date

How this information is held

This form contains health information, which is special category data under the UK General Data Protection Regulation. The Designated Safeguarding Officer is the custodian. It is held securely, disclosed only to those who need it to keep the performer safe, and destroyed within six weeks of the final performance of the production for which it was collected, in accordance with section 22 of this Policy.

For office use

Date received

Checked by (DSO or Deputy DSO)

Severe allergy or emergency medication notified to chaperone team on (date)

Recorded on chaperone working record by

Date destroyed, and by whom
