



## **Safeguarding Policy and Operational Procedures**

Last Update: Jan 2025

Approved by the Board of Trustees: Feb 2025

Small amend approved by email (David Bellwood): 12 Dec 2025

Due for Review: Feb 2026

### **Policy Statement**

Zoo Co believes strongly in the power of engagement and that everyone should be able to participate. We believe that theatre is better when everybody is invited. A lot of our work is accessible for deaf audiences, using Creative Captioning and integrated British Sign Language. Our casts and creative teams include artists who are deaf, disabled, neurodiverse, hearing, non-disabled or neurotypical.

In this work, we are committed to the safety of children and young people, Adults at Risk, and our employees.

We have formulated this policy and procedure, and the infrastructure that accompanies them, to instigate and maintain Safeguarding best practice.

### **Safeguarding is everyone's responsibility.**

Staff and freelancers (including facilitators and creative teams) should be fully aware of the organisation's Safeguarding guidelines, and are provided with a copy of the Safeguarding Policy. The Charity Commission advises that a Safeguarding Policy should be publicly available, and NCVO advises that it should be available on an organisation's website; ours is available to download here: <https://www.wearezooco.co.uk/zoo-co-young-company>

Safeguarding means:

- Protecting people from maltreatment and taking action to enable everyone to have the best outcomes.
- Preventing impairment of people's mental and physical health and/or development.
- Ensuring people are in circumstances consistent with the provision of safe and effective care.

**Safeguarding and child protection are different. Safeguarding is what we do to prevent harm; Child Protection is how we respond when we believe a child is at risk of harm, or has been harmed.**

**Child Protection is part of Safeguarding, and our processes are described in this Policy.**

It is the responsibility of the Trustees and the Executive Director (also Deputy DSL) to ensure that adequate policies and procedures are in place. The process of implementing this policy is the responsibility of the Executive Director and the General Manager.

We will seek to keep children, young people and Adults at Risk safe by:

- Adopting Safeguarding practices through procedures and a code of conduct for staff and freelancers.
- Providing effective management for staff and freelancers through supervision, support and training.
- Recruiting staff and freelancers safely, ensuring all necessary checks are made.
- Responding quickly and appropriately to all suspicions or allegations of abuse.
- Sharing concerns with families, schools and external agencies as appropriate.
- Not tolerating bullying. Incidents of bullying will be investigated and treated seriously. Action will be taken to stop the bullying.

This Policy should be amended as required by changes in legislation and best practice; these amendments should be made by the Deputy Safeguarding Lead, in consultation with the Designated Safeguarding Lead.

This Policy should be reviewed and adopted by the Board of Trustees every year.

## **Definitions**

### **Adults at Risk:**

An Adult at Risk is defined as any person over the age of 18 who:

- Has care and support needs
- Is experiencing, or is at risk of, abuse, harm or neglect
- As a result of their care and support needs is unable to protect themselves from abuse, neglect or the risk of it.

Just because someone is disabled or is older, it does not mean they cannot take care of themselves.

One important difference between safeguarding adults and safeguarding children is an adult's right to self-determination. Adults may choose not to act at all to protect themselves, and it is only in extreme circumstances that the law intervenes.

### **Children**

Children are not considered by the law competent to make decisions about certain areas of life.

Though we may use 'young people' **in conversation and correspondence** to refer to people under the age of 18, there is no ambiguity about our responsibilities and outlook: that under the law, a child is anyone under the age of 18, and all our child protection and safeguarding measures are built with this in mind.

### **Young People**

**In this document, we use 'young people' to describe YoCo members and others between the ages of 18 and 21 years old.**

### **Professional Curiosity**

Professional curiosity is a term often used in Safeguarding. It's a mindset - one that means you take interest in people, observe, listen and ask questions. A mindset of professional curiosity can help us identify the less obvious signs of abuse and neglect. It is relevant for work with children and adults.

You can read more about professional curiosity here:

<https://www.anncrafttrust.org/professional-curiosity-safeguarding-adults-an-essential-introduction/#:~:text=Professional%20curiosity%20can%20help%20us,we%20can%20respond%20to%20them.>

### **Zoo Co Designated Safeguarding Lead**

Flo O'Mahony

[florence@wearezooco.co.uk](mailto:florence@wearezooco.co.uk)

Phone number on request - available to staff and freelancers on request (as this document is available on our website).

### **Training:**

**Safeguarding Children Level 1:** all staff. Because we know children can choose to disclose to adults they know slightly, as well as adults they know well, all of our employed staff, and freelancers working with us regularly, receive this baseline training if they do not have a qualification in place which supersedes it.

This elearning course is provided free by Croydon Council:

<https://cscp.event-booking.org.uk/elearning-list>

Courses can also be purchased via the NSPCC ('Introduction to Child Protection').

**Designated Safeguarding Lead Level 3:** Both our Artistic Director (Sept 2023) and Executive Director (Sept 2023 & Nov 2025) have undertaken this training. The Exec is also certified by ArtsWork in Embedding Safeguarding (2022).

Flo is the Designated Safeguarding Lead for Zoo Co, Amy is the Deputy DSL, and Amy and Flo meet as required to confer over Safeguarding matters.

**Advanced Safeguarding Adults Training Level 2:** Our Creative Access Director has undertaken this training (March 2025).

**Verbal brief and reminders:** Given to core and contracted staff every year (1.5 hour session). Given to facilitators at the start of each engagement, or each academic year,, whichever is more frequent (1 hour session).

Termly Safeguarding check-ins should be built into freelance facilitators' contracted paid time with Zoo Co (30 minute session).

### **Performance Licences**

In YoCo performances, participants are unpaid for their work, and do not miss any school time to prepare or perform. Performance runs are less than 4 days. In this case, Croydon

Council does not require any performance licences for the children taking part in these productions:

<https://www.croydon.gov.uk/business-licences-and-tenders/licences-permits-and-registrations/apply/children-young-people-employment-permits/apply-standard-child-performance-and-activities>

If the circumstances of YoCo performances change, Zoo Co will obtain the relevant licences, and take advice from the Local Authority Education Welfare Teams.

## **Safe communication with children**

### ***Email***

When you need to email YoCo members, copy in another adult at Zoo Co for transparency.

When you email the whole YoCo group, or more than one member of the group, use BCC or mail merge, so their emails aren't available to one another.

Keep the content of your email clear, so there isn't room for misunderstanding; though these sign-offs can be common in the arts, don't use 'love' or 'xx'.

If you're concerned about the content of an email you've received from a young person or an Adult at Risk, please speak to the Designated Safeguarding Lead.

If you receive indecent images, stop viewing them as soon as you realise what is happening. Make the Designated Safeguarding Lead aware of what's happened immediately, but do not share the images themselves any further (even with the Designated Safeguarding Lead). Do not delete the content.

### ***Whatsapp and the YoCo phone***

Zoo Co maintains a dedicated YoCo phone to communicate with YoCo members about scheduling and other reminders. No YoCo personal numbers should be saved on personal staff mobiles.

All parents will be informed of the platforms used to communicate with young people, and will be asked for their written consent that their child be part of the YoCo Whatsapp group. For clarity, in a Whatsapp group, children can see each other's names and phone numbers, share information with each other including images, and 'Reply Privately' to one another in a way that cannot be seen by Zoo Co staff managing the YoCo Whatsapp group.

If a Zoo Co staff member needs to call a child (eg. to check if they are on the way to a session), they should use the company phone, and make the call in an area with another adult present.

### ***Social Media***

For your own safety, no staff member or freelancer should approach, befriend or follow any YoCo member online on any social network. Do not exchange private messages with young people online.

If you have a public account with no privacy restrictions, you can allow an under 18 to follow that account (ie. you do not have to block them), but you should not follow them back.

You may block a young person if you are not comfortable with them following you on a public account, for instance if you do not use that account in a professional capacity. You should block a young person if your feed contains material unsuitable for a young person.

Do not take or share photos of young people unless you have written consent from the parent / carer, and from the young person themselves.

If you are certain you have written permission for everyone pictured, you may post photos to the Zoo Co social media accounts. You may share these posts on your personal accounts, but you may not post these photos independently on your personal accounts.

Current organisational accounts are:

Moderated by Ruth Newbery-Payton, Project Administrator

Twitter @wearezooco

Instagram @wearezooco

Facebook @wearezooco

Moderated by Amy Smith, Executive Director:

Linkedin <https://www.linkedin.com/company/zoo-co-theatre-company/>

A young person, or their parents if the child is still under 18, may withdraw their consent from any and all images at any time. If consent is withdrawn, all images of them must be deleted from social media and from Zoo Co's folders.

Children shouldn't be tagged in posts by Zoo Co (they may choose to repost as a story and tag themselves and other children - this is OK and outside of our control).

If you mention (@) or check in at a location, the photo must not be posted 'live', but at some later point when the young people are elsewhere, ideally the following day or later. In the case of social media 'takeovers', where immediacy and liveness generate interest in a project, facilitators should think carefully about the make-up of the group, and each child's personal circumstances. Facilitators should speak to the group and individuals as required to outline to the group possible risks of sharing locations live. This is the most practical approach when the group meets and performs at a set, advertised location.

No full names of children should be spoken or written in captions; first names only. Only use images of young people in suitable clothing to reduce the risk of inappropriate use.

**Sharing work online checklist:**

- **From a Zoo Co account?**
- **Parental consent?**
- **Young person's consent?**
- **No tagging?**
- **No surnames?**
- **Posted after the event?**
- **Suitable clothing?**

Respect any rules on the use of social media and mobile phones at any off-site settings eg. schools, colleges, day care centres.

If an external photographer / filmmaker is engaged, there should be no unsupervised contact with children.

Do not show / signpost any unsuitable material to young people. This may be on your personal device, or in hard copy such as books, magazines, clothing or accessories.

Do not pass your personal device to a young person for them to research something (you probably don't have safe search functions set up on a personal device). Young people often run out of data; offer to create a hotspot, or search an image yourself and airdrop it to the child's device.

If you receive indecent images, stop viewing them as soon as you realise what is happening. Make the Designated Safeguarding Lead aware of what's happened immediately, but do not share the images themselves any further (even with the Designated Safeguarding Lead). Do not delete the content.

### **Storage of photographs and film**

Images of children should be stored only on Zoo Co's G Drive, or on the company phone. No images of children working with Zoo Co should never be stored on personal devices. If an image is taken on a personal device it should be posted on social media as above, moved for storage on the Drive if necessary, and then deleted, and the Deleted Items cleared.

### **Signage at events**

If public events are being filmed / photographed, there should be signage to indicate this, eg. 'Photographs and film will be taken at this event. Please speak to a member of Zoo Co staff if you need more information'.

At YoCo performances, signage saying that 'filming and photography is not permitted during the performance' should be clearly visible. Proud relatives and friends can share social media content from the Zoo Co accounts, or take photos after the performance when everyone's consent can be gained verbally by them.

### **Day / Evening Trips (for example to see shows)**

YoCo are sometimes offered the chance to attend a theatre performance eg. in Central London. Things to think about:

- Has parental permission been obtained?
- Is enough support offered with travel (wayfinding, travelling at night, cost)?
- Environmental risks - the weather, strike action, pandemic conditions, terror threat levels.
- Do you know enough about everyone's medical / access requirements?
- Do you know how to get in touch with Emergency contacts in case of emergency, or someone not arriving as expected?

### **Residential and Overnight Trips**

Zoo Co's programme of work includes opportunities for children and young people to attend residential activities. In circumstances where Zoo Co provides accommodation, the following considerations will be made:

- Staff members will sleep in separate rooms from YoCo members, but nearby.
- There will be a designated evening / night supervision rota in place; staff will be present in communal areas until late and all is quiet.
- YoCo members will be notified of who the night staff are and where their rooms are should they need any assistance (bad dreams, not feeling well, upset).
- Where bedroom, bathroom or toilet facilities are shared, under 18s will share with other under 18s, and 18 - 21s will share with other 18 - 21s.
- Staff will ideally have separate toilet and bathroom facilities. If the accommodation we use does not allow for this, they will share facilities with the over 18s group, and arrange to use them at different times where possible.
- We will ask the venue for blueprints of the dorms and number of beds per dorm so we can make sleeping arrangements ahead of traveling.
- YoCo members should only enter their own dorm / room. If staff need to enter a dorm, two members of staff should be present at all times (and the door open).
- No nudity or states of undress during activities and in shared spaces (this includes dorms). YoCo members should change in bathrooms, or in the dorm in private. No nudity or states of undress as skin means no underwear showing, and no toplessness.
- No partners will be allowed to share rooms together.
- We will then seek to have open and honest conversations with all young people and parents/carers (if appropriate) regarding individual needs for residential and dorms. These conversations will be around Safeguarding and Access.
- ZooCo will ask to be informed if a contractor/worker needs to be on site (eg. an emergency plumber)
- Zoo Co will ask for a list (if any) employees or contractors (eg. cleaners) may need access to the dorm site over the duration of the stay. An agreement will be made about how access is granted.

### **Communicating with families, schools and colleges**

YoCo members are between 16 - 21 years old. Generally they travel to us independently, and levels of contact with parents and carers vary; in general we have only slight contact.

Emergency contact details should be used if a child does not arrive when expected, and isn't responding to messages / calls to their own phone.

Zoo Co understands that schools and colleges play a key role in safeguarding children, and that those settings have a much fuller picture of the child's history and current circumstances. The school or college should be involved in most cases where additional support is needed. Ideally, consent from the young person would be obtained before contacting them, but lack of consent should not stop you from raising issues with the school or college.

Zoo Co understands that families should be involved in most cases where additional support is needed. Ideally, consent from the young person would be obtained before contacting the family.

Do not involve the parents where the parents are implicated, eg. in the case of domestic abuse.

### **Peer abuse**

Everyone working for Zoo Co should recognise that young people and Adults at Risk are capable of abusing their peers. Peer abuse is behaviour by an individual or group intended to harm others (physically, emotionally or sexually). This may take the form of the following safeguarding issues:

- Bullying (including online bullying) - emotional abuse, including exclusion
- Physical abuse like hitting, kicking, hair pulling or biting
- Sexual violence and sexual harassment
- Sexting (when this happens by or amongst young people it also known as 'youth produced sexual imagery')
- Initiation rituals that include violence or harm ('hazing')

To prevent Peer abuse taking place, you should:

- Ensure all sessions are supervised by the appropriate number of staff
- Act as a role model - demonstrate our rules in your own behaviour.
- Remind the group at key moments of Zoo Co's core principle of inclusivity.

Principles for dealing with:

### ***Fights or physical violence***

- Don't put yourself at risk
- Separate the people involved
- Create space for them to calm down
- Manage the group appropriately
- Report on what has happened

### ***Unkindness***

- Confront moments of unkindness firmly and clearly
- Report on what has happened



### ***Arguments and friendship breakdowns***

- These are a part of life and community, and to be expected
- Focus on the whole group continuing to participate together

### ***Extensive touch within exercises***

- Establish a traffic light system to agree touch within the group
- Discuss boundaries and consent around touch
- Re-direct the exercise

### ***Sexual activity amongst young people***

- The legal age for someone to consent to have sex (regardless of their sexuality, or the gender of either person) is 16 in the UK.
- If you learn that someone under the age of 16 is sexually active or has had sex, this is something you refer to the DSL. Someone under 16 may be freely consenting to having sex however, in the eyes of the law, they are too young to make this decision.
- If you learn that someone 16 - 18 (legally a child, but over the age of consent) is sexually active with someone 18 or older (an adult), this is something you refer to the DSL.
- It is illegal for an adult in a position of trust or responsibility to have sex with a 16 or 17 year old; if you learn of this situation, you should report it immediately.

### **Private fostering**

Private fostering is judged as taking place where a child or young person is looked after:

- Full-time
- By someone who is not a close relative (list here: <https://safeguarding.network/content/safeguarding-resources/children-care-others/private-fostering/>)
- For longer than 28 consecutive days
- When they are under 16, or under 18 if they have a disability.

This may be because they:

- Aren't getting on with their parents, or their parents are going through a separation
- Are being looked after by paid or unpaid contacts while their parents are working at a distance / abroad.
- Are staying with a friend or relative due to family illness or hospitalisation

It's not always a negative thing - it can be a really positive thing that a child is being supported by their wider community. But it is a situation that needs to be monitored. If you think that a child is being privately fostered, you should tell the DSL, who is then obliged to make a referral to Croydon MASH.

### **Acknowledging positions of power**

Zoo Co acknowledges that professional and appropriate relationships formed at groups like YoCo can be important for a young person as they pursue a career in the arts. We are potentially part of their professional network for years to come.

Zoo Co staff and freelancers also need to acknowledge that they have held a position of power in a young person's life, and that has a bearing on any future relationship after the child turns 18, and after they leave YoCo.

Contact should be limited to professional email accounts wherever possible.

After somebody leaves YoCo, a Zoo Co staff member may take up email contact only in a professional capacity, from their professional email account. Phone numbers should only be exchanged if the ex-YoCo member is over 18, and is working for Zoo Co in a paid, professional capacity.

If the YoCo graduate is over 18, a Zoo Co staff member or facilitator may follow someone back on social media. Whilst the staff member or facilitator still works for Zoo Co, they may not enter into a personal relationship with any ex-YoCo member.

Zoo Co strongly discourages personal relationships with ex-YoCo members, even if the staff member or facilitator no longer works for Zoo Co.

### **Work placements**

Young people and Adults at Risk visiting Zoo Co (either to its base, in rehearsal or at work 'on the road') as work placements or for work shadowing opportunities are entitled to the same commitment to their safety and protection as they would be if they were in their schools.

Lone contact between Zoo Co staff members and work placements should be avoided; work placements should always be supported in a group environment, within sight of other people.

Zoo Co will seek the guidance of the relevant schools or placement providers should it foresee potentially difficult situations with work placements.

### **DBS Checks**

Some roles at Zoo Co require DBS checks to be in place. These include roles with regular and prolonged work with young people - for instance our Young Company (YoCo), some of whom have worked with us for several years (weekly term-time sessions). These include roles with extensive financial administration, for instance people who hold logins to our bank account.

In general, the type of DBS check we require is:

**Enhanced** (rather than Standard).

**Child and Adult Workforce** - because we work with both children and Adults at Risk

**Regulated activity children** - yes - we are meeting regularly with children, and building relationships with them over time. We do not tend to require a check to cover Regulated

Activity with Adults, as this relates to personal care like toileting and dressing, so we do not ask for an Adults Barring list check.

Job adverts for roles at Zoo Co will include whether a DBS check is required to be in place for someone to take on that role.

The presence of an offence on a DBS check will need to be interpreted by the General Manager and Executive Director. Whilst there are some offences that make it impossible to work with or in proximity to children, there are others which are of no relevance and others which may not be of relevance. Zoo Co also maintains, within its Equal Opportunities Policy, an understanding of the Rehabilitation of Offenders regulations. In areas of interpretation, the nature of the job will be considered as well as the latest legislative situation.

If someone at Zoo Co is involved in a Safeguarding incident that results in their dismissal, the Designated Safeguarding Lead must tell the DBS (Disclosure and Barring Service). The DSL should also inform the DBS if the person would have been dismissed, but left in some other way first (eg. resigned or retired).

A DBS has no official expiry date. It is Zoo Co policy that a DBS should be renewed every three years. Someone joining us may present us with a DBS generated by another organisation that is **less than three years old**; this is acceptable to us, but the check should be renewed on or before the three year anniversary of when it was generated.

A DBS certificate should be presented to Zoo Co's General Manager or Executive Director to be checked. We will make a note of some details in a spreadsheet with restricted access; it's not best practice to take a copy or retain a copy of the actual certificate.

(Source:

[https://learning.nspcc.org.uk/media/3324/child-protection-records-retention-and-storage-guidelines\\_june\\_2023.pdf](https://learning.nspcc.org.uk/media/3324/child-protection-records-retention-and-storage-guidelines_june_2023.pdf))

A person may also be a member of the Update Service:

<https://www.gov.uk/dbs-update-service>

in which case Zoo Co will check the status of a certificate this way. Zoo Co strongly advises everyone undergoing a DBS process to join this service (which can be done within 30 days of a new check being generated).

#### **How to check a certificate as an employer using the Update Service:**

You use this link to check the Update Service:

<https://secure.crbonline.gov.uk/crsc/check?execution=e1s1>

You need this info from the person to be able to do it:

*I give you permission to check my Enhanced DBS on the update service.*

DOB:

Certificate number:

Name as it appears on certificate:

You can then see the details of their certificate, and transcribe the relevant parts into Zoo Co's DBS log.

### **Job Descriptions and advertising**

Zoo Co recognises that safe recruitment and selection practice is vital in safeguarding and protecting children. Zoo Co will ensure that the following appears in all Job Descriptions:

*Zoo Co is committed to safeguarding all children and Adults at Risk with whom we work; we expect all staff and freelancers to share this commitment.*

At interview, Zoo Co staff will ask about any gaps in employment history of one year or more, explaining that this is a requirement of our Safeguarding Policy, and that most life circumstances that create gaps in employment are not material to us when selecting candidates.

Two references are requested and contacted before offering any employee role.

### **Obligations to our employees**

In terms of working practice, all employees are entitled to feel that they are not being put into situations where they could be at danger of malicious or mistaken claims; Appendix 1 and Appendix 2 provide guidelines that support a safe way of working.

Employees owe a duty of care to each other, an obligation to support each other in working with children, young people and Adults at Risk. They must also ensure that the management of the company is aware of potential problems and that inappropriate behaviour is reported through the Safeguarding reporting structure.

### **Child Protection Procedure**

Child Protection is the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm, or about whom there are those concerns. It is part of safeguarding and promoting welfare.

Anyone at Zoo Co may report:

- Something you observe directly - the behaviour or physical appearance of a single child, between children, or between an adult and a child
- A second-hand report - from a child, a parent, a colleague, or someone else. This may come in the form of a disclosure - see Appendix 1

You should make a note of your report as soon afterwards as is practical, and pass this to the Designated Safeguarding Lead. This must be done within 24 hours, which may mean contacting the DSL out-of-hours, or interrupting a weekend or a holiday; a Safeguarding concern is a legitimate reason for out-of-hours contact.

If the DSL is uncontactable, you should contact the Deputy DSL instead, again out-of-hours if necessary.

Appendix 5 at the end of this document offers a template reporting form, which reminds you of all the necessary details for your report.

What we will do next is summarised in this flowchart:

[https://drive.google.com/file/d/1tOCC3SHRMLvjdSebHLTbie\\_7jubB2DQW/view?usp=drive\\_link](https://drive.google.com/file/d/1tOCC3SHRMLvjdSebHLTbie_7jubB2DQW/view?usp=drive_link)

### ***For the Safeguarding Team once they have a report***

The DSL and Deputy DSL should meet to discuss the report as soon as is practical, and not more than 24 hours after the report is submitted to them. Other staff may be invited to the meeting as relevant, balancing the need for expertise / experience with the need for confidentiality.

At this meeting, or immediately afterwards, they should log the report on the Safeguarding Log.

During this meeting, the group will review the report they have been given, and decide on next actions using the following documents as guides:

Pan-London Threshold Guidance (adopted by Croydon Safeguarding Children Partnership Sept 2024):

[https://drive.google.com/file/d/1jUqWff6y9e9w65XrZiReRKxIph6gbGrA/view?usp=drive\\_link](https://drive.google.com/file/d/1jUqWff6y9e9w65XrZiReRKxIph6gbGrA/view?usp=drive_link)

Or online here:

<https://www.londonsafeguardingchildrenprocedures.co.uk/files/threshold.pdf>

We may also wish to refer to this Levels of Need examples sheet from our DSL training (2023):

[https://drive.google.com/file/d/158ul1hz4W5thMmwmzJi3ww0zzIXwpB-k/view?usp=drive\\_link](https://drive.google.com/file/d/158ul1hz4W5thMmwmzJi3ww0zzIXwpB-k/view?usp=drive_link)

If a decision is made to report on to the LADO or to Croydon MASH, this should be done as soon as is practical, and within 24 hours of the meeting taking place.

If other decisions are made, for instance to contact the child's family or the school or college for a further discussion, these should be actioned as soon as is practical, and within 3 days of the meeting taking place.

We should feed back to the person who made the report, if they have not been part of this meeting. We should:

- Reassure the person that they have done the right thing in reporting their concerns.
- Let them know that we may not be able to report back to them on actions taken (to preserve confidentiality), but reassure them that action is being taken.
- Remind them to keep their report confidential. If they need further support processing what they have reported, we should support them in signposting appropriate sources. We should remind them not to discuss it with friends or colleagues.

## Appendix 1

### Professional etiquette with young people

The following notes are not intended to make you uncomfortable or self-conscious about your behaviour with children. They are guidelines for appropriate contact with young people.

- Never talk to a child alone, eg. in the office, a corridor or a separate room from the group. Use a corner of the room in sight of the rest of the group and other facilitators if you need some privacy to speak to an individual.
- If you follow a child outside, or offer to go outside with a child who is upset, use busy public areas like the benches at the front of Stanley Arts, facing the main road. Your co-facilitator should come and check on you both if you are not back after 5 minutes.
- If you talk to a child alone in our dedicated rest areas, move parts of the structure to open up the rest area and make you visible to the rest of the group.
- Please keep any physical contact with children to a minimum.
- Should you need to make physical contact with a child to model an exercise, Zoo Co practises a 'safe touch' approach. First of all, ask yourself whether it is necessary to touch the child; is demonstration or verbal instruction adequate?
- Next, seek the child's permission and if they say 'no' it must be respected.
- Facilitators may use a **Traffic Light System** to establish consent at the beginning of a movement session; a gesture like a hand across the chest indicates 'do not touch me'. This has the advantage of a collective approach - young people know the boundaries amongst their peers.
- If the child agrees then tell the child or young person where you are going to touch them (restrict touch to arms, shoulders and mid-back) and how you will touch – then explain why you are going to touch. The process feels quite formal and stilted, but in reality, can be quite simple: eg. 'is it OK if I touch your arm? I'm just going to move your arm slightly so that your mimed action is a bit stronger.'
- Children sometimes show their gratitude in a physical way, eg. a hug. Redirect to something more appropriate if possible eg. a high five. If this isn't possible, keep the hug brief and restrict your touch to arms, shoulders and mid-back. Don't offer hugs yourself.
- Whilst working with young people in a session, use a single-cubicle toilet like an accessible toilet.

### Handling Disclosures

A disclosure is when a child tells you that they have been harmed, or are at risk of harm. The law recognises four forms of child abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse

- Neglect

Children can disclose to people they do not know well, as well as to people close to them; it's important that everyone working for Zoo Co recognises when a disclosure is taking place so they can respond appropriately.

Should a child offer you information e.g. 'I'm being bullied', or should a child seem distressed about the emotions of the themes in a workshop session:

- Make sure that there are other people around and that it is not just you and the young person in a confined space, and listen carefully to what they say.
- Let them know, gently, and early in the conversation that you cannot keep what they're telling you confidential.
- Try to stay calm and not look shocked or disturbed. Listen without interrupting. You can nod or make verbal affirmation that you have heard what the young person is saying.
- Only ask questions if you didn't understand what was said, for example if it was said quietly or you require a word to be repeated.
- Do not promise to keep a secret. You can reassure the young person that they have done the right thing in telling someone. You can thank them for telling you, and you can tell them they are brave. You can tell them it's not their fault.
- Make a note of exactly what they have told you as soon as possible afterwards. Use their own words as much as possible. Sign it immediately and pass it to the Artistic Director (as DSL), the Executive Director (as Deputy DSL) or the General Manager. By hand, email or Whatsapp; whichever method is the quickest and most direct. Responsibility then passes to them to respond to the issue, reporting on as needed.
- A child may, as part of a creative exercise like free writing or poetry, speak about harmful acts like self-harm or abuse. If you are concerned about the content of a piece of creative expression, you should speak to the child about it soon afterwards. This later conversation may lead to a disclosure, in which case you should follow the guidelines above.

## **Chronologies**

Following advice from young people's theatre company C3, from Autumn 2024 we will begin keeping chronologies for YoCo members. This document will be separate from the Safeguarding Incidents Log, and will record moments of concern that fall below the Safeguarding reporting threshold. Chronologies will be maintained all through a child's time at YoCo. This should help Zoo Co spot patterns, for example deteriorations in behaviour or mental health over time. Examples of things that may be included in a chronology:

- If the child tells us they have suffered a bereavement (family, friends, pets)



- If allegiances or friendships in the group (or in their wider circles) change or break down
- If the child describes harmful acts or distressing situations in their creative expression
- Explained injuries and significant illnesses

## Appendix 2

### Professional Etiquette with Adults at Risk

An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.

Adults can be deemed to be at risk at certain times - eg. a diabetic having a hypo is an adult at risk, but a diabetic is not necessarily an adult at risk the rest of the time.

Whilst personal characteristics may make an individual more vulnerable i.e. a disability or communication difficulties, it is the situation around a person which may increase risk or place them at potential risk of harm. You should be open to the possibility that any adult may be at risk and that this can be temporary or ongoing depending on the support and protective factors around them.

An adult at risk can, always or sometimes, be either someone working for the company as an employee or a freelancer, or someone joining us as a participant. An adult at risk can be a friend.

Zoo Co staff and freelancers need to acknowledge that they may hold a position of power in another adult's life, and how vulnerable that person is at any point in time:

- Are you a facilitator, and they a participant?
- Are you their line manager, or somewhere in their line management structure?
- Does your role hold power over whether we offer further employment to that person (eg. in the case of a producer and an actor)

If you are a facilitator, and they are an unpaid participant on a project, or an unpaid work placement, we expect similar boundaries in place to **Appendix 1**.

If the person is a paid colleague, you may need to consider:

- Whether a personal relationship is appropriate; whether you would like to accept invitations to social media like Instagram and Whatsapp. You can always choose to connect on these platforms at a later stage, for instance when a contract with Zoo Co is completed.

You should report any concerning behaviour. This could be directly to the DSL, but you may prefer to report things you've noticed to your line manager, or to the General Manager.

These people will pass reports on to the DSL for a safeguarding discussion as needed.

Examples may include:

- Direct signs of abuse: the same four categories as with children - physical, emotional, sexual, and neglect (eg. withholding necessities like medication, food and heating). In addition, adults can suffer financial abuse. You may see signs of domestic violence, coercive control, or modern slavery.
- Reports of abuse: a report (a disclosure) from the person that indicates something like the above is taking place.

- Self-neglect. Someone not taking care of themselves in the usual ways eg. around personal hygiene. Hoarding behaviour is a sign of self-neglect. Avoiding or ignoring medical appointments is a sign of self-neglect.

There are also some behaviours an adult at risk might enact that impact you negatively, and should be reported. Examples may include:

- Excessive messaging on social media.
- 'Over-sharing' - sharing personal information with you that you feel crosses the boundaries of the relationship you hold with that person.
- Emotional blackmail - the feeling that you are being manipulated into things you don't want to / wouldn't usually do to protect the feelings of that person.

The 6 key principles of safeguarding Adults at Risk	
<p><b>Empowerment</b> People being supported and encouraged to make their own decisions and informed consent.</p> <p><i>'I am asked what I want as an outcome, and this informs the process'</i></p>	<p><b>Protection</b> Support and representation for those in greatest need.</p> <p><i>'I get help and support to report abuse and neglect. I get support to take part in the safeguarding process to the extent I want to.'</i></p>
<p><b>Accountability</b> Procedures and responsibilities are known. No-one expects reputation to protect them if they perpetrate abuse.</p> <p><i>'I understand the role of everyone involved in my life and so do they.'</i></p>	<p><b>Prevention</b> It is better to take action before harm occurs.</p> <p><i>'I get clear information about what abuse is. I know how to recognise the signs, and I know how to ask for help.'</i></p>
<p><b>Partnership</b> Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.</p> <p><i>'I know that staff treat personal and sensitive information confidentially, and will only share what is helpful and necessary. I am confident that professionals will work together to get the best outcome for me.'</i></p>	<p><b>Proportionality</b> The least intrusive response appropriate to the risk presented.</p> <p><i>'I know that the professionals will work in my interest, and they will only get involved as much as necessary.'</i></p>

Source:

<https://www.anncrafttrust.org/resources/six-principles-adult-safeguarding/>

## **Appendix 3**

### **GDPR and Safeguarding**

#### **Shared Drive, remote working, and people's personal data**

Zoo Co has a hybrid working policy, nationwide networks, and a high number of disabled staff and stakeholders. This means remote working and Zoom calls are an intrinsic part of work at Zoo Co.

Zoo Co uses G Suite, so there should only be very rare circumstances when contact details or images of anyone are downloaded to a personal laptop or other personal device.

In the rare case that you do download contact details or images onto your personal device, you should make sure everything you need is saved in the right place on the G Drive (with restricted access if necessary), and clear your downloads folder (and/or wherever they were saved) at the end of your session of work.

Artists who need access to creative content like videos should be given links to online sites (for instance, YouTube videos set to Private) not downloadable files.

#### **Safeguarding records**

Records of Safeguarding concerns should be held in a folder on the Drive with access restricted to key members of staff (the DSL, the Deputy DSL and the General Manager).

**Concerns about a child** should be kept until the child is 25 years old.

**Concerns about an Adult at Risk** - we can't find information on how long these records should be retained. We will retain records for 15 years after the concern has been raised.

**Concerns around the behaviour of an adult** should be kept for 10 years, or their normal retirement age, whichever is longer. They should be stored in the person's personnel file, and not just in a centralised log.

This is so Zoo Co can:

- Respond to future reference requests
- Respond to requests to clarify information disclosed as part of a vetting or barring check
- Provide accurate information if allegations resurface after a period of time.

Source for Records Retention:

[https://learning.nspcc.org.uk/media/3324/child-protection-records-retention-and-storage-guidelines\\_june\\_2023.pdf](https://learning.nspcc.org.uk/media/3324/child-protection-records-retention-and-storage-guidelines_june_2023.pdf)

ICO (Information Commissioner's Office) guidance makes it clear that an individual's right to be forgotten is not absolute; Safeguarding records would usually constitute an exception, as Zoo Co is carrying out our legal obligation to safeguard children and Adults at Risk.

If we receive a request for material to be deleted, we will review it in light of this guidance.

Source:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-erasure/#:~:text=This%20is%20also%20known%20as,only%20applies%20in%20certain%20circumstances.>

## **Appendix 5**

### **Roles and Responsibilities**

#### **Designated Safeguarding Lead**

Flo O'Mahony

Artistic Director

Email: [flo@wearezooco.co.uk](mailto:flo@wearezooco.co.uk)

Phone number on request - available to staff and freelancers on request (as this document is available on our website).

#### **Deputy DSL**

Amy Smith

Executive Director

Email: [amy@wearezooco.co.uk](mailto:amy@wearezooco.co.uk)

Phone number on request - available to staff and freelancers on request (as this document is available on our website).

#### **Board level lead for Safeguarding**

David Bellwood

### **Key contacts**

#### **LADO (Local Authority Designated Officer)**

The LADO is responsible for managing allegations against adults who work with children.

<https://www.croydonlcsb.org.uk/lado>

Jane Parr : [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)

Telephone: 020 8726 6000 Ext 24817 Mobile: 07716 092630

Email: [LADO@croydon.gov.uk](mailto:LADO@croydon.gov.uk)

LADO Service Manager

Steve Hall : [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)

Telephone: 020 8726 6000 Ext 24334 Mobile: 07825 830328

#### **Croydon MASH (Multi-Agency Safeguarding Hub)**

MASH is responsible for managing child protection concerns. It is also called the Croydon Safeguarding Children Partnership.

<https://www.croydonlcsb.org.uk/#>

If you have an urgent concern about a child that needs an immediate response (same day intervention by a social worker):

<https://www.croydonlcsb.org.uk/report-concern-about-child>

Phone: 0208 255 2888 (Monday to Friday 9am to 5pm)

Phone Emergency Duty Team: 0208 726 6400 outside of these hours (Press 5 for Children's Services).

If you are a professional working with children, you can also seek advice from a social worker by contacting the MASH Professionals Consultation Line 0208 726 6464 (Monday to Friday, 1pm - 4.30pm)

### **DBS (Disclosure and Barring Service)**

Website: <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

DBS helpline: 03000 200 190

Email: [customerservices@dbi.gsi.gov.uk](mailto:customerservices@dbi.gsi.gov.uk)

### **CEOP (Child Exploitation and Online Protection command)**

A way to report online abuse / grooming

[www.ceop.police.uk](http://www.ceop.police.uk)

### **NSPCC Helpline**

0808 800 5000 - 24 hours, Freephone

### **Croydon Safeguarding Adults Board**

If you suspect that you or an adult you interact with may be at risk of abuse, you can submit an online report to the Croydon Safeguarding Adults Board here:

<https://www.croydon.gov.uk/adult-health-and-social-care/report-abuse-adult> or call 020 8726 6500.

**If the issue concerns a person in another part of London or the country, check their local authority website for advice.**

**If you believe a child or Adult at Risk is at immediate risk of harm call 999 or 101.**

## Appendix 5

### Safeguarding Incident report form

<b>Name of child/Adult at Risk</b>
<b>Age (approx if necessary):</b>
<b>Ethnicity and gender (if known) (the inclusion of this information is recommended by our reporting structures):</b>
<b>Name of staff member making this report:</b>
<b>Date and time of incident:</b>
<b>Location of incident:</b>
<b>Who else was involved / saw what happened</b>
<b>Details:</b>
<b>Action taken:</b>
<b>Parents/carers informed: yes/no</b>

**Signature of staff member reporting incident**

\_\_\_\_\_ **Date** \_\_\_\_\_

**Signature of (Deputy) Designated Safeguarding Lead**

\_\_\_\_\_ **Date** \_\_\_\_\_