

Royal Academy of Dramatic Art

Safeguarding Policy and Procedures

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Introduction

1. The Royal Academy of Dramatic Art (RADA) offers world-leading conservatoire training for actors, stage managers, directors, designers and technical stagecraft specialists. RADA recognises its safeguarding obligations in relation to vulnerable individuals who need to be protected from abuse, neglect or any form of harm. This document sets out the policy and procedures of RADA to ensure a safe creative learning environment for children and young people under the age of 18, and for adults at risk.

RADA believes all individuals have a right to learn and develop within a safe environment, and is committed to protecting all of its students, participants, staff and volunteers (including Trustees) from harm in the context of their time spent on RADA premises and engaged in RADA activities. RADA also recognises its responsibilities to protect staff, students and volunteers against any unfounded allegations of abuse emerging from time at RADA or from work undertaken for RADA.

Alongside this, RADA recognises that, for the majority of its students, participants, and other stake-holders over the age of 18, RADA is not 'in loco parentis' (in the place of the parent); for the majority of the members of its community over the age of 18, RADA's responsibilities do not, therefore, extend to those equivalent to being a legal guardian.

This policy aims to ensure that all those in the RADA community are safe and supported on RADA premises and in the context of RADA's organised activities, while recognising an appropriately heightened safeguarding responsibility in relation to under 18s and to adults designated at risk.

As a registered charity and a registered higher education body RADA follows the Charity Commission safeguarding guidance and has procedures in place to ensure that the expectations of the Office for Students are met both in relation to a standard duty of care for all members of the community, and to safeguarding in relation to vulnerable individuals.

Policy Statement

- 1 **RADA recognises that:**
 - we (and all connected with us) have a responsibility to safeguard the welfare of:
 - children and young people under the age of 18 within the RADA community,
 - adults designated at risk within the RADA community,
 - those children and adults at risk who come into contact with RADA activities,
 - RADA students at risk of radicalisation (see paragraph 62);
- 2 the welfare of the child under 18, adult at risk or student for whom we have duty of care is paramount;
- 3 where we have a duty of care, all individuals, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or gender identity have the right to equal protection from all types of harm or abuse;
- 4 we must work in partnership with appropriate individuals and agencies to support those for whom we have a duty of care and to promote safeguarding; and
- 5 we expect the same high standard of safeguarding practice from those external organisations with whom we work in partnership, including those based overseas.

For the purpose of this policy, RADA has safeguarding responsibilities in relation to:

- adults at risk registered as students (as above);
- adults at risk attending RADA for auditions or participating in RADA activities elsewhere;
- under 18s registered as students;
- under 18s attending RADA for auditions or participating in RADA activities elsewhere;
- staff and volunteers (including Trustees) in the course of their duties.

Purpose of the Policy

- 6 This policy is intended to ensure that:
- RADA operates in an environment that is safe for members of its community;
 - we are taking account of the legislative context and relevant guidance and good practice in the education sector;
 - staff, students and other members of the RADA community understand their roles and responsibilities in respect of safeguarding;
 - we ensure appropriate action is taken in the event of incidents/concerns of abuse or risk of harm and provide support to the individual/s that raise or disclose the concern;
 - we ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored (in compliance with the Data Protection Act 2018);
 - we only share information without consent where there is a serious risk of harm, or where an individual has been harmed;
 - we prevent the employment/deployment of unsuitable individuals by implementing safer recruitment practices; and
 - we ensure robust safeguarding arrangements and procedures are in operation.
- 7 The policy and procedures will be widely promoted and are mandatory for everyone involved in RADA. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.
- 8 For the purposes of this document when we refer to staff it covers all permanent, temporary, freelance and volunteer staff as well as Council Members.

Scope

- 9 RADA's full-time higher education students are over 18 years of age (this is an entry requirement that RADA will seldom vary). RADA also offers programmes that may include young people under the age of 18. The current contexts in which RADA works with young people under the age of 18 are:
- RADA's Widening Participation and Outreach programme, including the RADA Youth Company, and young people attending any events at RADA organised by the Access and Participation team;
 - short courses and day classes, especially those targeted at the 16-25 age group;
 - Shakespeare in Schools tour to secondary schools and associated workshops;
 - Open Days;
 - schools' tours (of RADA) and information days about RADA;
 - as a venue for external organisations and companies, including young people in the audience and, on occasion, performing;
- 10 This policy forms part of the Respect at RADA Framework, which comprises the policies and guidelines expressing our approach to ensuring everyone can work and study in a safe, respectful and welcoming environment. The other resources in the Framework are:

Related policies

- [Student Code of Conduct](#)
- [RADA Zero Tolerance Statement](#)
- [Staff Handbook](#)
- [Intimacy in Performance Protocol](#)
- [Student Non-Academic Misconduct Policy](#)

- [Prevent Policy and Action Plan](#)
- [Health & Safety Policy](#)
- [Respect at RADA Policy](#)
- [Equality, Diversity and Inclusion Policy](#)
- [Reasonable Adjustments Policy for students](#)
- [Student handbook](#)
- [Staff-Student Relationship Policy](#)
- Students of Concern Policy

Definitions

- 11 **Child:** In England a child is defined as anyone who has not yet reached their 18th birthday. This includes young people who have reached aged 16, even if they are living independently.
- 12 **Adult at Risk:** The Care Act 2014 defines an adult at risk as any person aged 18 years and over who: has needs for care and support and; is experiencing, or is at risk of, abuse and neglect and; as a result of those care needs is unable to protect themselves from either the risk of, or the experience of, abuse and neglect. An Adult at Risk may therefore be a person who:
- Is frail due to ill health, physical disability or cognitive impairment
 - Has a learning disability
 - Has a physical disability and/or a sensory impairment
 - Has complex mental health needs
 - Has a long-term illness/condition
 - Is unable to demonstrate the capacity to make a decision and is in need of care and support
- 13 **Parent:** includes any person with Parental Responsibility.
- 14 **Adult and child abuse:** the types of abusive behaviours covered by this policy include:
- Alcohol and Substance misuse
 - Breast Ironing
 - Carrying offensive weapons
 - Child criminal and sexual exploitation including County Lines
 - Concealed pregnancy
 - Criminal exploitation
 - Discriminatory
 - Domestic violence, including "honour" based abuse
 - Emotional
 - Exploitive use of technology
 - Female Genital Mutilation (FGM)
 - Financial or material abuse
 - Gangs
 - Gambling
 - Hate and "mate" crime

- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Peer on peer abuse, including sexual violence and upskirting
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Spiritual abuse
- Trafficking
- Upskirting

- 15 **Prevent Duty:** This policy includes RADA's statutory obligation (section 26 of the Counter-Terrorism and Security Act 2015) to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent Duty.

Safeguarding roles and responsibilities

- 16 RADA endeavours to safeguard children and adults at risk by:
- adopting safeguarding guidelines through procedures and a Code of Conduct for students, staff and volunteers;
 - following carefully the procedures for recruitment and selection of staff and volunteers;
 - providing effective management for staff and volunteers through supervision, support and training;
 - preventing and protecting vulnerable individuals from violent extremism and the threat of radicalisation;
 - sharing information about concerns with relevant professional agencies;
 - sharing information about safeguarding and good practice with students, teachers, group leaders, carers, parents, staff and volunteers;
 - reviewing its policies and practice at regular intervals, including an annual review of its Safeguarding policy;
 - making appropriate safeguarding referrals to contacts within Camden as its local authority; and
 - dealing effectively with any allegations made against staff and volunteers.
- 17 All staff at RADA have a role to play in delivering RADA's Safeguarding Policy, and certain staff or groups have specific responsibilities.
- 18 The **RADA Council** has overall responsibility for ensuring that there are sufficient measures in place to meet RADA's safeguarding objectives. All Council members will receive a copy of this policy and will be offered training on safeguarding. A suitably qualified Council member has been nominated as the **Council Member for Safeguarding**; to act as a 'critical friend' to RADA staff and ensure that appropriate policy and systems are in place. Council receives regular reports on Safeguarding activities and makes recommendations for further action where necessary.
- 19 The **Registrar** is the designated senior RADA officer with overall responsibility for this policy, for its regular review and for ensuring that appropriate safeguarding mechanisms are in place. The **Designated Safeguarding Leads (DSL)** are

responsible for implementing the safeguarding policy. The Head of **Student Wellbeing and the Director of Access and Participation** are RADA's Designated Safeguarding Leads.

- 20 Designated **Course or Departmental Directors** are responsible for ensuring that activity is conducted in accordance with the RADA Safeguarding Policy and Procedures, including reporting any instances where the policy might have been breached, informing HR of the potential need for further DBS checks and ensuring that staff are sent on safeguarding training.

RADA's **Safeguarding Steering Group** is responsible for maintaining oversight of safeguarding activities, reviewing the Safeguarding Policy and making recommendations to the **Learning, Teaching and Student Experience Committee** for any actions that need to be taken to maintain compliance and good practice. The Safeguarding Steering Group maintains a safeguarding risk register, which is shared with the Audit and Risk Committee.

- 21 All **staff** have a responsibility to report any concerns to their course/departmental director or to the one of the Designated Safeguarding Leads.
- 22 The **Deputy Registrars** along with the **Registrar** and **Head of Student Wellbeing** have access to our register noting any 'Students of Concern' for safeguarding/health and wellbeing reasons.

Procedures for handling safeguarding concerns or disclosures

Purpose of the procedures

- 23 The purpose of these procedures is to guide staff in safeguarding children, young people, and adults at risk from harm when participating in RADA projects and to make clear to staff their responsibilities, actions they should take and lines of responsibility.
- 24 **All staff** are expected as part of their role at RADA to:
- follow safeguarding policies, procedures and systems;
 - maintain awareness of safeguarding and its importance;
 - be alert to potential signs and indicators;
 - take appropriate action when necessary;
 - undertake safeguarding training.
- 25 Please do not assume that it is somebody else's responsibility to report any safeguarding concerns; this is how things get missed. If you are working with a school group or in a school, you should ensure that you know who the school's DSL is and contact them immediately with any concerns.

How to raise a concern or report a disclosure to you

- 26 If something is reported to you, or you have any safeguarding concerns, you should refer this to the Designated Safeguarding Leads. At present this should be in person or by email, using the guidance sheet or reporting form. We will incorporate this into briefing and training for staff. Any staff member reporting a safeguarding concern must sign and date the reporting form, or send it from their RADA email address, on the same day.
- 27 Disclosing abuse is difficult for a variety of reasons. Some children and adults at risk do not disclose because they feel they will not be believed or be taken seriously. It is very important that staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure. The chart below shows some

things to do and those not to do when speaking to someone.

DO	DON'T
<ul style="list-style-type: none"> • Stay calm • Recognise your feelings, but keep them to yourself • Use language that the person can understand • Reassure the person that: telling you is doing the right thing; they are not to blame; you believe that they are telling the truth • Listen carefully, record what the person says and keep these notes • Explain what you will do next (i.e. tell a Designated Safeguarding Lead) in a simple and clear way • Follow the standard procedure in telling a Safeguarding Lead and seeking advice and support for yourself. 	<ul style="list-style-type: none"> • Panic or delay • Express strong feelings of upset or anger • Use jargon or express opinions • Probe deeply for information • Use leading questions • Make them repeat the story • Promise unconditional confidentiality • Approach the person against whom the allegation has been made, or discuss the disclosure with anyone other than your line manager or the safeguarding officers.

28 You can use the **safeguarding concern form attached in Appendix 1** to report a safeguarding concern. This is available as a separate document on SharePoint. If you don't have access to any of these forms, then follow the guidelines below:

- Records should be made as soon as possible after the event/concern is raised on the same working day
- They should contain the date, time, people present, anything said (verbatim if possible) and any action taken, including whom the concern was reported to and when.
- Physical appearance or behaviour of the person disclosing to you should be recorded as factually accurately as possible.
- Professional opinion should be set apart from factual observations and labelled as such. Judgmental language should be avoided.

29 The Designated Safeguarding Lead will maintain records on all concerns relating to a child or adult at risk and these records will be contained in a confidential file, separate from the staff or student members' other files to preserve confidentiality, in accordance with Data Protection requirements. Records will be held for six years after the last contact (i.e. attendance at a RADA programme) with the child or adult at risk.

30 Where safeguarding concerns are raised The DSLs will contact the Police for further advice. A summary record of any students at risk is maintained, including external contacts, and access to that information is limited to the Safeguarding Officer, DSLs and Deputy Registrars.

What happens after a report is made?

31 RADA will seek advice from relevant external agencies in the first instance. If appropriate, following advice from Social Services or the Police, RADA will investigate any report that is made, including if we receive an anonymous report. Our ability to

investigate anonymous reports will be limited by the level of information provided, which is why we encourage anyone raising a safeguarding concern about another person to provide sufficient detail to enable us to take appropriate action. See the process charts on pages 12 and 13.

- 32 This procedure below will be followed whenever a disclosure has been made, or there is a suspicion that a child or adult at risk is at risk of harm or has been abused, or if a child, adult at risk or student is at risk of radicalisation. You should make a written record of any and all concerns.
- a. The reporting person will make a detailed written record of the matter, using if possible the **safeguarding concern form Appendix 1**, and report it within twenty-four hours to one of the Designated Safeguarding Leads or to the Safeguarding Officer.
 - b. The Designated Safeguarding Leads (and, in their absence, the Safeguarding Officer) will assess the level of risk and where appropriate, seek advice from external agencies where required to inform decision making about the appropriate course of action to be taken, sharing necessary information as appropriate to best protect the child or adult at risk with their consent wherever possible.
 - c. Where risk of harm or abuse is identified, RADA will take action to best protect the person in question. RADA will involve the person in the decision making and act with their consent where possible. The Safeguarding Leads will take action without consent where this is considered to be in the best interests of the child, vulnerable adult or student concerned.
 - d. RADA will support the child or adult at risk in understanding the risk of harm, and encourage and empower them to take any appropriate action to mitigate that risk themselves, with support.
 - e. Where it is agreed that no immediate action needs to be taken, a programme of follow-up and support will be agreed.
 - f. In the case of an allegation of abuse being made against a member of staff or a student, the individual concerned may be informed of the allegation, on the advice of the Local Authority and/or Police, and may be removed from contact with children and adults at risk in line with the appropriate disciplinary process (staff or student).
 - g. Any internal disciplinary action arising from an investigation will be handled in accordance with the relevant disciplinary process (staff or student).
- 33 RADA assures all staff that it will fully support and protect anyone who, in good faith, reports his or her concerns that anyone is, or may be, abusing a child or vulnerable adult.

Allegations against a student

- 34 Where an allegation is brought against a student on one of RADA's full-time higher education programmes, this will be handled in accordance with the Student Non-academic Misconduct procedure. Reports should be made to the Registrar or another member of the Student and Academic Services Team.

Managing allegations against RADA staff

- 35 RADA will ensure that safeguarding concerns or complaints regarding staff reported by students, staff or the public are taken seriously. Procedures for managing such allegations are followed according to national statutory guidance (*Working Together to Safeguard Children 2018*). If you have a safeguarding concern involving a staff member please report this immediately to the Head of HR. All reports should be made on the day that the concern comes to light. Note that all procedures apply equally to current instances and historical ones, i.e. safeguarding concerns relating to previous actions that have just become known.

- 36 Staff members who are the subject of a safeguarding allegation are assured that RADA's internal procedures for managing such allegations are fair and transparent, and operated in line with the ACAS Code of Practice for disciplinary and grievance procedures. RADA will seek advice from relevant external agencies in such cases before initiating its internal procedures.

If the matter is the subject of a criminal investigation

- 37 RADA may pursue its own or complementary confidential enquiries and disciplinary action with permission from the Police. The Designated Safeguarding Lead will consult with the relevant agencies in such cases, including the police as appropriate and following RADA's disciplinary/misconduct policies.
- 38 To maintain the integrity of the investigation, individuals who face an allegation may be advised to only discuss the substance of the allegation with his or her union or legal representative, immediate family or as directed by the investigating officer.
- 39 Following an investigation, disciplinary action may be taken as appropriate
- 40 Information is shared and discussed between staff and relevant agencies on a need-to-act basis only.
- 41 RADA's local authority is Camden Borough Council. If it is necessary to involve the local authority, we will refer to Camden Safeguarding Children Partnership (<https://cindex.camden.gov.uk/>) or Camden Safeguarding Adults Partnership Board (www.camden.gov.uk/ccm/content/social-care-and-health/about-social-care/protecting-a-vulnerable-adult.en?page=5).
- 42 We will involve the local Camden Prevent liaison officer and also seek advice from the Department for Education's HE Prevent Co-ordinator in relation to radicalisation concerns.

Recruitment, vetting, induction and training of staff

- 43 RADA recognises that anyone may have the potential to abuse children and adults at risk in some way and will take all reasonable steps to ensure unsuitable people are prevented from working with them.
- 44 RADA complies with its on-going duty to notify the Disclosure & Barring Service (the "DBS") with any relevant information regarding the conduct of any individual that RADA considers to have caused harm or pose a risk of harm to vulnerable groups.
- 45 RADA will implement appropriate recruitment procedures for personnel working on activities with children and/or adults at risk, having substantial access to children and/or adults at risk, access to children's personal information or images, or who through the course of their work are liable to find themselves in a position of trust. These procedures will include:
- Identity and DBS checks carried out by HR on the offer of a post that is likely to have significant contact with children and/or adults at risk.
 - Two reference checks that confirm their suitability to work with children.
 - Ensuring that enhanced DBS checks are carried for all staff who work with children on a one-to-one basis.
 - All staff contracts will refer to this policy about protecting children and adults at risk, and by signing contracts, staff will be confirming that they have received a copy of this policy.
 - All staff will undergo a Right to Work check, ID check and where relevant, qualification checks as part of the recruitment process.

- 46 It is essential that all staff who have access to children and adults at risk understand their safeguarding responsibilities and what to do in the event a disclosure is made to them, or they suspect risk of harm or abuse. To aid this, all staff will receive training on safeguarding during their induction period. This training will be updated every two-three years.
- 47 For its widening participation, outreach and short courses work, RADA will take the following steps:
- Only employ staff, where possible, who have actually been observed working with children, young people or adults at risk (as appropriate) by the Senior Widening Participation and Outreach Manager, Director of Short Courses, Director of Technical Training, Director of Actor Training, Associate Director, or other specified staff member.
 - Ensure that a teacher, youth worker, care worker or other group leader from the host organisation is present during workshops delivered by RADA outside of our own venue.
 - Only contract photographers and film makers working on education and wider work that have been checked through the DBS Update service or have completed a new enhanced DBS check for RADA.
 - Provide visiting professionals with a copy of this policy, and the Director or Project Leader Handbook, or handbook for short courses/WP staff, as appropriate.
 - All individuals must sign and date confirmation that the policy has been received and understood, and records of these declarations will be retained.
 - Ensure that staff members are aware of RADA's zero tolerance of bullying and abuse. Abuse in this context is defined as physical abuse, verbal abuse and neglect. RADA also treats this as meaning abuse towards themselves, personal alcohol or drug abuse ('misuse'). Please note: that RADA has zero tolerance on the use of drugs and alcohol whilst working with RADA.
 - Any staff member found to be under the influence of alcohol or drugs whilst working on a RADA project will be dismissed with immediate effect. All allegations and incidents of any form of this defined abuse will be taken extremely seriously.

Student session leaders, students on placement and other volunteers

- 48 From time to time RADA hosts placements from students studying related subjects to actor training or technical theatre arts. RADA students are also offered the opportunity to complete workshop-leader training to enable them to lead workshops with children and young people.
- 49 RADA requires that:
- Students should not have unsupervised contact with children.
 - For placements of other students within RADA, references should be sought from a course tutor and at least one other referee who can vouch for their suitability to work with children. They will be checked through the DBS Update service or required to complete a new DBS check for RADA.. The DBS reference number will be noted and the details kept on file.
 - Students receive adequate supervision and monitoring and are given responsibilities appropriate to their age and ability. They are not asked to teach or take sole responsibility for a whole class or group.
 - Safeguarding training will be part of the workshop leader training offered to RADA students.

Annual reporting to Council

50 An annual report will be submitted to the Council on safeguarding. This report will provide the Council with monitoring information to enable the Council to consider whether RADA's child and adult at risk protection duties are effectively discharged. This will include information in respect of staff training and anonymous case details. Council will receive an update on any safeguarding/Prevent matters arising during the course of the year as a standing item as part of the SLT's report.

51 Council is responsible for annually reviewing RADA's Prevent Strategy, risk assessment and action plan.

52 Sexual relationships

Under the Sexual Offences Act 2003, it is a criminal offence for a person to engage in a sexual relationship with a person under the age of 18 when they are in a position of trust in relation to that person. At RADA, all staff, volunteers and anyone formally representing RADA are considered to be in a position of trust for this purpose. RADA considers it unethical for staff and visiting professionals to enter into sexual or romantic relationships with students over the age of 18, and failure to disclose any such relationship may result in disciplinary action being brought. Please see the Staff-Student Relationship Policy for further information. Please also see the RADA Student Code of Conduct.

53 Off-site visits, performances and trips

RADA programmes may involve trips away from its premises. RADA includes the safeguarding of under 18 year olds and adults at risk in the pre-departure risk assessment procedure and makes appropriate arrangements on the basis of this assessment. Beyond this, and the general requirements of this policy and procedure, no additional arrangements are made.

54 Use of IT facilities

RADA's policies on the use of IT (see the Staff and Student Handbooks for respective policies) prohibits their use to access, store or distribute pornographic material. Appropriate web filtering is in place and the Director of Finance and Operations receives reports on any blocked content from RADA's external IT provider. We will report any concerns arising from these reports to the Police or other relevant authorities as appropriate.

55 Alcohol

It is illegal for alcohol to be sold to or bought by people who are under the age of 18 years. RADA takes reasonable steps to seek to ensure that the law is not broken in relation to licensed premises under RADA's control but cannot undertake to supervise individual students. HE students are bound by both the Student Code of Conduct and the Drugs & Alcohol Policy in relation to the purchase and consumption of alcohol whilst on the premises.

56 Parental and third party involvement

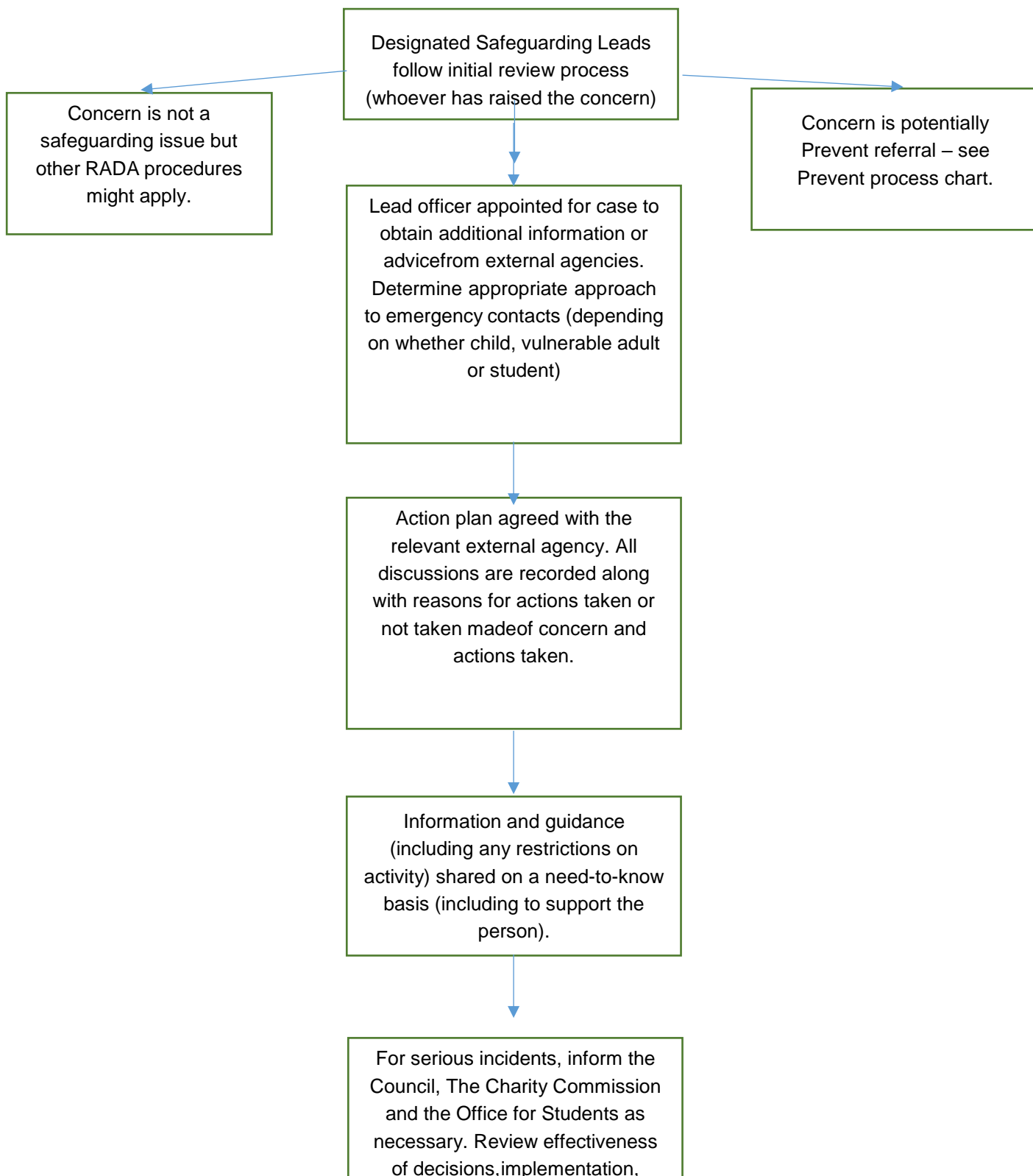
In normal circumstances RADA deals directly with students (with whom it has a contractual relationship) and not with parents or other third parties, and this approach applies to students who are adults at risk or are under 18 years. RADA has duties under data protection legislation to preserve the right to privacy and confidentiality of students. RADA therefore only discloses information regarding students (including

adults at risk or under 18 year olds) to third parties (including parents, guardians and next of kin) in accordance with its Data Protection Policy and Emergency Contact Procedure.

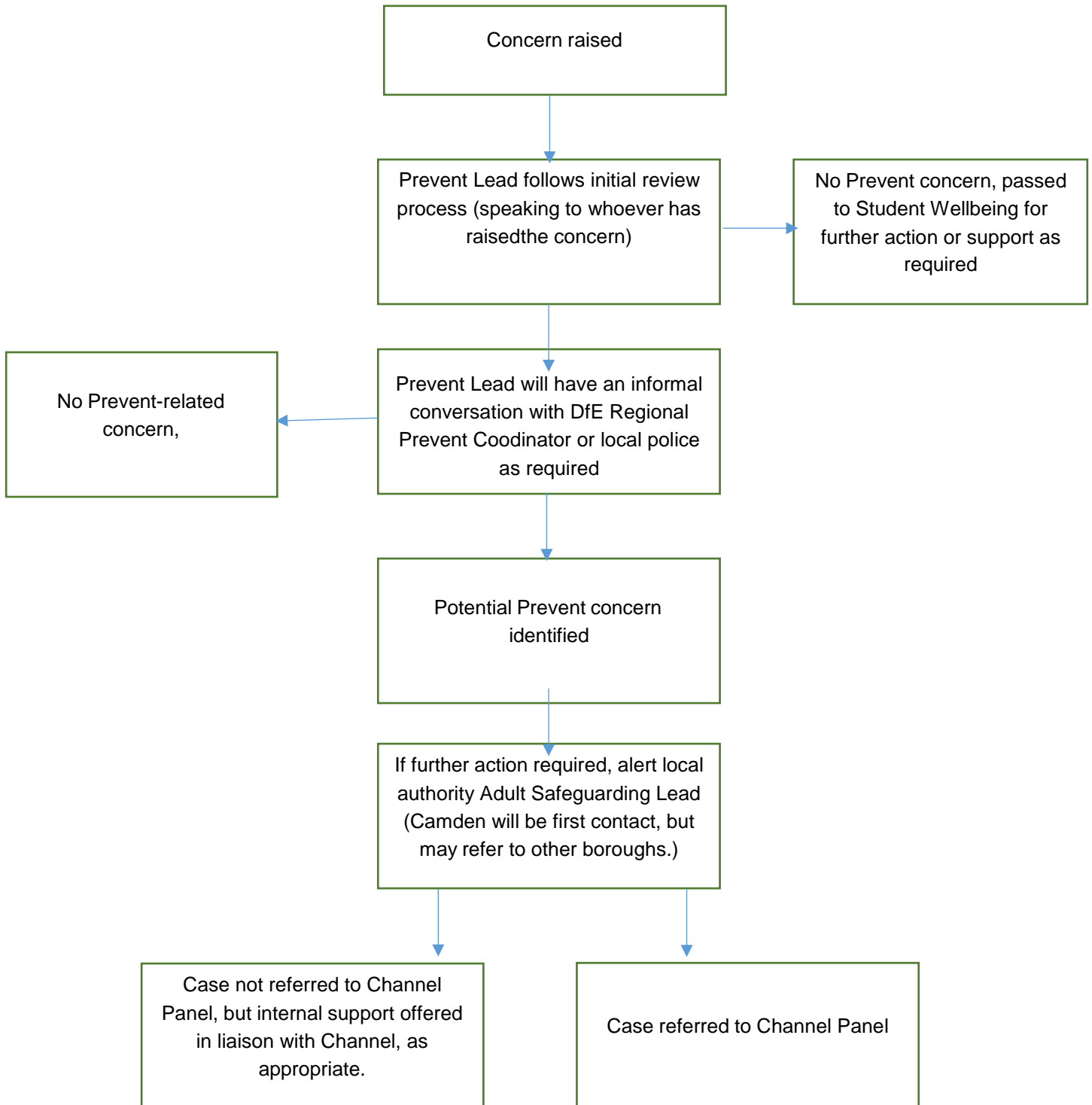
The Prevent Duty

- 57 The Prevent Duty places on Higher Education institutions a statutory duty to have due regard to prevent people being drawn into terrorism. If you suspect or have reason to believe that a student may be drawn into terrorism please follow safeguarding protocols, and pass on the concern within 24 hours.

Safeguarding process flowchart



Prevent-related process flowchart



Appendix 1: Safeguarding reporting form

RADA

PRIVATE & CONFIDENTIAL

Safeguarding concern record

(Click on the grey boxes to complete)

Your name and job title:

Email:

Telephone:

Date and time:

Student name:

Information about your concern, including what you perceive to be the risks to the person:

Does the student know you are sharing this concern?

Yes

No

Please save this form to your device and email as an attachment to:

Mike Bryant, Designated Safeguarding Lead

mikebryant@rada.ac.uk

or Axa Hynes, Designated Safeguarding Lead

axahynes@rada.ac.uk

If you print this form, please ensure that it is kept securely.

Appendix 2: Staff signature sheet

Name:

Job role:

Date:

I confirm that I have received, read and will comply with RADA's Safeguarding Policy and Procedures.

Signature:

All staff will receive a copy of the Safeguarding Policy and Procedures and be asked to sign to confirm that they have received and read the policy. A summary version of the policy including a copy of the reporting form is available at RADA Receptions should a staff member need to report a concern or incident.

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