Rainbow Circus Safeguarding Policy

August 2024

The purpose of this policy statement is:

• To set out guidelines for the protection of children, young people, vulnerable adults and participants of all ages who access the service of Rainbow Circus.

• To provide staff and volunteers, as well as adults, children and young people accessing our services and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Rainbow Circus including the board of trustees, paid staff, volunteers, seasonal workers, and students.

Safeguarding Legislation and Guidance:

This policy has been drawn up on the basis of legislation, policy and guidance that

seeks to protect adults and children in England, including: Information Sharing (2018), The Safeguarding Vulnerable Groups Act (2006), Working Together To Safeguard Children, Under the care act (2014) A summary of the key legislation and guidance is available from nspcc.org.uk/childprotection.

Definitions:

Safeguarding: Safeguarding is about embedding practices throughout the organisation to ensure the protection of vulnerable people wherever possible and responding to circumstances that arise.

Abuse: Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

It can take a number of forms, including the following:

- Physical abuse
- Domestic violence and Domestic abuse
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission

- Self-neglect

Supporting documents:

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

• Role description for the designated safeguarding officer

• Dealing with disclosures and concerns

• Managing allegations against staff and volunteers

• Recording concerns and information sharing

• Records retention and storage

• Code of conduct for staff and volunteers

• Behaviour codes for participants

• Photography and sharing images guidance

• Safer recruitment

• Online safety

• Anti-bullying

• Managing complaints

• Whistleblowing

• Health and safety

• Induction, training, supervision and support

• Supervision ratios.

We believe that:

• No-one should never experience abuse of any kind

• We have a responsibility to promote the welfare of all of our service users, to keep them safe and to practise in a way that protects them.

We recognise that:

• The welfare of out beneficiaries is paramount in all the work we do and in all the decisions we take

• Working in partnership with adults, children, young people, their parents, carers and other agencies is essential in promoting people's welfare

• All people, regardless of age, disability, gender reassignment, race, religion or

belief, sex, or sexual orientation have an equal right to protection from all types

of harm or abuse

• Some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues

• Extra safeguards may be needed to keep people who are additionally vulnerable safe from abuse.

We will seek to keep our participants and beneficiaries safe by:

• Valuing, listening to and respecting them

• Appointing a nominated Safeguarding Lead and a Lead Trustee for Safeguarding

• Adopting protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers

• Developing and implementing an effective online safety policy and related procedures

• Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently

Research and resources

• Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.

• Recording and storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/for-organisations]

• Sharing information about safeguarding and good practice with adults, children and their families/carers via leaflets, posters, group work and one-to-one discussions

• Making sure that all of our beneficiaries and participants and their families/carers know where to go for help if they have a concern.

• Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving participating adults, children, young people, parents, families and carers appropriately.

• Using our procedures to manage any allegations against staff and volunteers appropriately

• Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise

• Ensuring that we have effective complaints and whistleblowing measures in place

• Ensuring that we provide a safe physical environment for our, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

• Building a safeguarding culture where staff and volunteers, participants and beneficiaries, their families/carers, treat each other with respect and are comfortable about sharing concerns.

Contact details:

Nominated Safeguarding lead

Name: Mowenna Roesner

Phone/email:

Trustee Lead for Safeguarding

Name: Zoe Lovegrove

Phone/email: 07734864434/zvlovegrove@yahoo.co.uk

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: …… (date)

Signed: ……Signed: …….

Name:……Name:……

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Rainbow Circus Safeguarding Policy procedures

Role description for the designated Lead of Safeguarding

The role of the Lead of Safeguarding and Trustee lead for Safeguarding is to ensure that all trustees, volunteers and coaches associated with the Rainbow Circus understand and fulfil their responsibilities, namely, to ensure that there is a protection and safeguarding policy together with a code of conduct.

The Lead of Safeguarding and Trustee Lead for Safeguarding are obligated to:

- Operate a safe recruiting procedure which requires advanced DBS checks for all trustees and volunteers.
- Ensure all other trustees and staff/volunteers have safeguarding training updated as appropriate; but at least annually.
- Undergo relevant safeguarding training, attend meetings, activities with trustees, volunteers and beneficiaries to understand safeguarding on the ground.
- Ensure all trustees are aware of and will comply with the Charity Commission guidance on safeguarding and protecting people and also the 10 actions trustee boards need to take to ensure good safeguarding governance.
- Champion safeguarding throughout the organisation.
- Be a point of contact for staff or volunteers for any safeguarding concerns including if someone wishes to complain about a lack of action in relation to safeguarding concerns.
- Ensure all participants and beneficiaries using the service are taught about safeguarding (including online safety) as part of the service and where to go and what to do should they have concerns.
- To keep a record of all safeguarding concerns in line with the record retention and storage procedure.

- To understand when to refer a case onto other agencies following South West Child Protection Procedures. (https://swcpp-devon.trixonline.co.uk/chapter/reporting-concerns) or Adult Social Care Services (https://www.devon.gov.uk/adult-social-care/safeguarding/)
- Work with the CIO and Safeguarding Leads regularly to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.
- To create an annual safeguarding report to present to board of trustees. This report may include number of overall concerns, number of referrals to statutory services, nature of concerns raised, number of allegations against staff and volunteers and their progress, training record of trustees and volunteers at all levels.
- To use this data within our annual charity's trustee annual report for the Charity Commission.
- To assess the Charity's safeguarding risks and evaluate the implication for the organisation and it's aims. To review the safeguarding report and plan to update or adapt relevant policies to improve safeguarding practise.

All trustees are obligated to

- To have read and understood the 10 actions trustee boards need to take to ensure good safeguarding and governance. (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf)
- Make an accurate written report of any disclosures and concerns about an adult, child or young person in line with our recording concerns and information sharing policy and hand over to the designated Lead of Safeguarding orTrustee Lead for Safeguarding
- To attend safeguarding training at least annually.
- Ensure adults, children and young adults using the service are taught about safeguarding (including online safety) as part of the service and where to go and what to do should they have concerns.
- To help build a safeguarding culture where staff and volunteers, adults, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.
- To behave in accordance with our code of conduct and help assist in the creation of a safe environment.
- To report any risks to the Lead of Safeguardingo r Trustee Lead for Safeguarding.

Dealing with disclosures and concerns

Rainbow Circus identifies that as well as having a responsibility to consider the welfare of all participants and beneficiaries using our services we have specific duties to safeguard and promote their welfare.

The four key steps to follow within Rainbow Circus are: *Be Alert, Question Behaviours, Ask for help and Refer*. It is the responsibility for all within Rainbow Circus to be alert to signs of abuse or neglect and understand the Devon Safeguarding Children Partnership Procedures and Devon Safeguarding Adults Service. Our steps may not always be used sequentially. For example if a person is in immediate danger or risk of harm, Rainbow Circus would refer to children or adult social care and/or the police.

All concerns and discussions about a person's welfare, the decisions made and the reasons for those decisions will be recorded in a written format and used to inform our annual safeguarding report.

Guidance when dealing with a disclosure:

1. Offer reassurance, listen and take seriously what is being said. Allow the person to speak openly, ask open questions and avoid asking leading questions. Remain calm and do not overact, act shocked or disgusted. Never promise to keep secrets or be persuaded not to take actions.

2. Recognise that it is not your job to investigate, verify what is being said or examine the individual disclosing: this is the statutory responsibility of the adult/child protection services and/or the police. However it is important to ascertain relevant information.

3. Explain the process to the individual; that you will need to pass this information on, to whom, the reasons why and possible actions.

4. Any concerns will be recorded, including the person's voice, body map (if necessary) and other relevant information in line with recording procedure. Concerns may also be shared with the Safeguarding Lead and or Trustee Safeguarding lead, these conversations will also be recorded in writing.

Please see "Recording concerns and information sharing" section to understand our method of recording disclosures or concerns.

Managing allegations against staff and volunteers

Any allegation or concern that an employee, trustee or volunteer has behaved in a way that has harmed, or may have harmed a participant or beneficiary will be taken seriously and dealt with sensitively and promptly regardless of where the alleged incident took place.

When an allegation is raised it is important to gather the facts of the case and keep a record of information including, date, time, place and accurate record of the alleged event. This should be reported to the Safeguarding Lead.

However if an allegation is made that a staff member or volunteer has:

- behaved in a way that has harmed, or may have harmed an adult or child accessing our service
- possibly committed a criminal offence against, or related to, our service users
- behaved towards a beneficiary in a way that indicates they may pose a risk of harm to children or adults
- behaved in a way that indicates they may not be suitable to work with children and adults

It must reported **immediately** to the relevant agencies (for example the NSPCC Helpline on 0808 800 5000 or help@nspcc.org.uk, Devon local child protection services, Devon Safeguarding Adults Service or the police, Emergency Duty Service on 0345 6000 388.).

Rainbow Circus will liaise with Devon local child protection services, LADO, Devon Safeguarding Adults service and the police to ensure that we are responding appropriately. If the allegation is against someone Rainbow Circus does not employ directly, then the organisation they work or volunteer for should be involved in the investigation.

In England, each local authority must have one or more designated officers whose role is to manage and oversee investigations of allegations against people who work with children (Department for Education, 2023). Devon's LADO details are as follows: 01392 384964 or email childsc.localauthoritydesignatedofficersecure-mailbox@devon.gov.uk

Devon's Safeguarding Adults service details are as follows: 0345 1551 007 or email adultsc.safeguardingadultservices-mailbox@devon.gov.uk

Rainbow Circus will make every effort to maintain the confidentiality of all parties while the allegation or concern is being investigated. Rainbow Circus will support the persons involved and their parents/carers by informing parents/carers as soon a possible, inform them how the allegation is going to be managed and keep those informed about the progress and outcomes of the case.

The safeguarding lead will keep clear and comprehensive summaries of all allegations, details of the investigation and decisions made about the allegation and actions taken.

Rainbow Circus is legally obligated to refer unsuitable people to criminal records agencies (Disclosure and Barring Service) if a person has left our organisation or resigned because they have harmed or might have been at risk of harming a child. This is referred to as 'relevant conduct' by the Disclosure and Barring Service. If a carer, parent or member of the public has a safeguarding or child protection concern about someone who is working in a regulated activity or work with children, they should contact the police, social services or the person's employer.

Recording concerns and information sharing

Rainbow Circus will keep an accurate written record of:

• The date and time of the incident/disclosure

• The date and time of the report

• The name and role of the person to whom the concern was originally reported and their contact details

• The name and role of the person making the report (if this is different to the above) and their contact details

• The names of all parties who were involved in the incident, including any witnesses

• The name, age and any other relevant information about the person who is the subject of the concern (including information about their parents or carers and any siblings) what was said or done and by whom

• Any action taken to look into the matter

• Any further action taken (such as a referral being made)

• The reasons why the organisation decided not to refer those concerns to a statutory agency (if relevant)

The Rainbow Circus Safeguarding Lead will adhere to the "What to do if you're worried a child is being abused Advice for practitioners" (2015). Rainbow Circus follows the local South West Child Protection Procedure (https://swcpp-devon.trixonline.co.uk/chapter/reporting-concerns).

Support and protection records retention and storage

Adult and child support and protection records will be electronic or paper-based, they will be kept confidential and stored securely. Electronic files are to be password protected and stored on computers with protection against hackers and viruses. Information about support and protection concerns and referrals are to be kept in a separate file for each adult or child, rather than in one 'concern log'. The support and protection file is to be started as soon as Rainbow Circus become aware of any concerns. Rainbow Circus will keep support and protection files separate from a adult/child's general records. The adult/child's file will be marked to indicate that there is a separate support and protection file.

Records relating to concerns about a volunteer, trustee or staff members' behaviour will be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual. If concerns have been raised about an a volunteer, trustee or staff members' behaviour around children, Rainbow Circus will keep the records in their personnel file at least until they reach their normal retirement age or for 10 years – whichever is longer. Rainbow Circus will keep clear and comprehensive records of all allegations made against adults working or volunteering with children, including: what the allegations were,

how the allegations were followed up, how things were resolved, any action taken, decisions reached about the person's suitability to work with children.

If Rainbow Circus staff and volunteers use their personal computers to make and store records, it is essential to ensure the records are being stored securely. If the Safeguarding Lead leaves a new lead will be appointed by the trustees to take over their role and arrange a proper handover.

When the retention period has finished the Safeguarding Lead will shred or incinerate confidential material in the presence of another trustee member.

Code of conduct for staff and volunteers

Charity staff and volunteers must:

- Act with integrity and honesty.
- Ensure that you are aware of and comply with the charity's policies.
- Undertake any necessary training for your role.
- Listen to and respect other staff, volunteers, beneficiaries and other stakeholders.
- Promote relationships that are based on openness, honesty, trust and respect.
- Treat everyone fairly and without prejudice or discrimination.
- Ensure language is appropriate and not offensive or discriminatory.
- Ensure any equipment is used safely and for its intended purpose.
- Challenge any unacceptable behaviour and report any breaches of this Code of Conduct or any concerns without delay to a trustee.
- Report any allegations/suspicions of abuse or fraud.
- Respect everyone's right to personal privacy and ensure that any personal information is kept secure and not disclosed.
- Volunteers are not obligated to work at specific times, but if you commit to doing something and are unable to, ensure that the charity is made aware as soon as possible.

Charity staff and volunteers must not:

- Allow concerns or allegations to go unreported.
- Develop inappropriate relationships such as contact with children or vulnerable people that is not a part of the work of the Charity or agreed with the trustees.
- Share your personal contact details (mobile number, email or address) or have contact with a beneficiary or vulnerable person via a personal social media account.
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of anyone.
- Act in a way that can be perceived as threatening or intrusive.
- Make inappropriate promises to young or other vulnerable people, particularly in relation to confidentiality.

(For Social Media Code of conduct: Please see our Online Safety procedure).

Behaviour codes for participants and beneficiaries

The purpose of this section is to ensure all of our participants and beneficiaries are treated fairly by all adults working with them at Rainbow Circus and know what is expected of them.

Rainbow circus is committed to:

- Encourage cooperation
- Identify and praise acceptable behaviour
- Raise self-esteem and self-confidence
- Anticipate and resolve conflict that may arise
- Promote self-awareness, self-respect and self-control
- Encourage people to recognise and respect the rights of others
- Communicate clearly the expectations within the sessions, workshops and classes including safe use of equipment and space
- To communicate when a change of behaviour needs to occur to provide a safe space for all service users
- To encourage restorative conversation and reparation
- Display expectations using visuals

Participants and beneficiaries are expected to:

- Be friendly and kind
- Engage in co-operation, including listening and respecting each other's differences
- Treat staff, volunteers and peers with respect
- Report any worries or concerns to staff, volunteers or trustees
- Follow instructions and rules designed to ensure their safety and the safety of others
- Treat equipment and resources with respect, using them inline with safe instruction and demonstration.

It is the responsibility of the organisation to ensure that all people attending Rainbow Circus classes and workshops are informed of this code of conduct and to confirm with them that they have seen, understood and agreed to follow it. Participants must also be made aware of the consequences if they breach the code.

If a person breaches the code of conduct the following steps will be taken:

- Rainbow Circus will, of course, remind them about the code of conduct and use verbal and visual supports to promote acceptable behaviours.
- Rainbow Circus will endeavour to plan a positive response, in line with the individuals level of understanding, age and needs.

- Rainbow Circus will support reflection, reparation and restorative conversations to promote positive behaviours.
- If the following steps above have been followed and inappropriate behaviour persists Rainbow Circus will endeavour to work with the individual and their parents/carers in a informal/formal discussion to plan steps to support the individual conform to the code of conduct. This may include a further revision of the code and/or supportive intervention. At this stage discussions will be recorded in line with recording and information sharing policy. This stage may be repeated as necessary.
- If supportive interventions are not effective in helping the person to change their behaviours. If their behaviour continue to pose a risk to themselves or others then Rainbow Circus will discuss with the person and their family/carers a referral for further support from other services.

Use of child protection procedures:

If Rainbow Circus become concerned that a child's behaviour suggests either the they may be at risk of significant harm or that they may present a risk of significant harm to other children then Rainbow Circus's child protection procedures will be followed and referral may be made to the local authority. Such a referral would be discussed with the child and their family/carers at the earliest opportunity, except in situations where this would possibly endanger a child's safety or interfere with police investigation.

Photography and sharing images guidance

Rainbow Circus works with a variety of adults, children and families as part of its organisations activities. Rainbow Circus understands its responsibility to protect people who take part in our sessions, workshops, events and activities, specifically those where photographs and videos may be taken. Our photography and sharing images guidance aims to set out the overarching principles that guide our approach to photographs/videos being taken of people during our events and activities. Rainbow Circus operates in line with our values and within the law when creating, using and sharing images of children and young people. This policy applies to all staff, volunteers and other adults associated with Rainbow Circus.

We Recognise that:

- Sharing photographs and films of our activities can help us celebrate the successes and achievements of our service users and provide a record of our activities and raise awareness of our organisation.
- The welfare of all who take part in our activities is paramount.
- Adults, children, their parents and carers have a right to decide whether their images are taken and how these may be used regardless of, age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.
- The consent to take images of our participants is only meaningful when adults, children, their parents and carers understand how the images will be used and stored,

and are fully aware of the potential risks associated with the use and distribution of these images

- There are potential risks associated with sharing images online
- Adults, children, their parents and carers have the right to not consent to photographs and videos being taken and we will respect their wishes. We will never exclude a person from an activity because we do not have consent to take their photograph.

We will support this by:

- During public events make the audience and workshop participants aware that photography and video will be used throughout the day and should they wish to raise concerns to contact a member of the team at the event so that their image is not used in promotional material or to document the activities of the event.
- Always ask for written consent from any participant or their parents or carers (if under the age of 18 or vulnerable) before taking and using a child's image during our sessions.
- Always explain what images will be used for, how they will be stored and what potential risks are associated with sharing images.
- Never publish personal information about individuals and disguise any identifying information (work uniform, school logo's etc).
- Only using images which positively reflect people's involvement in the activity.
- Encouraging an open forum where concerns about images being shared can be discussed and any issues resolved.

Photography and or/filming for personal use

- Rainbow Circus reminds parents, carers and children that they need to give consent for Rainbow Circus to take and use their images
- We ask that photos taken during an event not be shared on social media without the permission of those pictured or their parents/carers.
- Rainbow Circus recommends that people check the privacy settings of their social media account to understand who else will be able to view any images they share

Safer recruitment

Rainbow Circus ensures safer recruitment through the following processes:

- All Trustees and staff will be required to submit to a Disclosure and Barring Service and Recruitment (DBS) check to make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. Rainbow Circus will not accept /carry over DBS check from another employer. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable

adults in a wide range of posts. No formal job offers (paid or voluntary) with be made until after checks for suitability are completed (including DBS checks and references).

- All trustees and staff will need to submit referees, providing evidence of their suitability and experience working with vulnerable groups.
- Parent Volunteers will need to be in the presence of Trustee members or Rainbow Circus staff with DBS checks. Parent volunteers are responsible for their own children, not anyone else's unless written permission is granted by their parent/carer.
- Any advertisement of voluntary or paid work within Rainbow circus will provide the following safeguarding statement: “recruitment is done in line with safe recruitment practises.”
- Job or role descriptions for all roles involving contact with vulnerable beneficiaries will contain reference to safeguarding responsibilities.
- And job or role descriptions will specify that the applicant must be competent with regard to child protection and safeguarding.
- Rainbow Circus will ensure established trustees, staff and volunteers are regularly reviewed through a rolling annual programme with re-checks DBS’s in all identified posts.
- The organisation, will sub contract work to organisations who provide Circus Skills services. As a result Rainbow Circus will systematically check the safeguarding arrangements of partner organisations. Contracts and memorandums or agreement for partnership delivery work will include clear minimum requirements, arrangement for safeguarding and non compliance procedures.

Online safety

Operating online carries specific safeguarding risks connected to protecting people from abuse and protecting sensitive information. These are managed and reflected in our policies and practices. This policy deals with the use of all forms of social media, such as Facebook, X, Instagram, WhatsApp, Tik Tok, YouTube and all other social networking sites, internet postings and blogs. It applies to use of social media for Charity’s purposes as well as personal use that may affect our Charity in any way. All trustees are responsible for the success of this policy and should ensure that they take the time to read and understand it, adhere to the requirements described and ensure that their use of social media involving reference to Rainbow Circus does not damage the reputation of the charity.

Social Media

Rainbow Circus has sole control over their website and social media accounts. Trustee’s are responsible the setting up and management for posts made on social media accounts. They are the only people authorised to and will be the only ones with access to these accounts. Their posts must adhere to the following content procedure.

Trustees must ensure they reflect Rainbow Circus's values in what they post. Trustees are permitted to respond to comments on our social media channels on behalf of the Charity. All posts should be attributed to the charity and not an individual. In some cases it may be appropriate for a trustee or volunteer, to make a post or remark as themselves but this should be under the supervision of the board of trustees. Trustees who post on social media must take reasonable steps where necessary to seek verification and ensure accuracy of our posts. This includes checking data/statistics and being wary of photo manipulation. They must manage any risk to the charity and its brand and ensure it shares honest and factual material.

Trustees and Volunteers must make sure that all social media content has a purpose and a benefit for Rainbow Circus to further our charitable purposes (directly or indirectly) therefore all content must accurately reflect the Rainbow Circus and bring value to our service users and supporters.

Trustees and Volunteers must not post content about supporters, service users or partners without their, or guardian's express permission. If using interviews, videos or photos that clearly identify a child or young person, staff and volunteers must ensure they have the consent of a parent or guardian before using them on social media. It is critical that all staff or volunteers abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988, when representing the charity. Never use or adapt someone else's images or written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

Trustees and volunteers must not use social media to defame or disparage Rainbow Circus, our trustees, volunteers or any third party; to harass, bully or unlawfully discriminate against staff or any third parties; to make false or misleading statements; to directly or indirectly make derogatory comments or use offensive or inappropriate language in any social media communication; or to impersonate trustees, volunteers or third parties.

Trustees and volunteers should note that if they provide advice on social media in a personal capacity on matters which relate to the Rainbow Circus, it is often easy for you to be identified as connected to the Charity. Therefore advice may be interpreted as reflecting an official Charity line. You should therefore avoid exposing yourself to a situation where your advice or views could potentially be interpreted as those of the Rainbow Circus and should report to the board of trustees should you feel you have jeopardised this.

Trustees and Volunteers should be respectful to others when making any statement on social media and be aware that they are personally responsible for all communications which will be published on the internet for anyone to see. On personal social networks and messaging services– even closed ones like Facebook and WhatsApp – trustees and volunteers should be aware that posts can be shared outside of their network. If a posting is made which could bring the organisation into disrepute then the person posting could be subject to action which removes them as a Trustee or Volunteer. If uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with the board of trustees. Trustees and Volunteers must take reasonable steps to protect their personal reputation as well as that of the charity's. They should be careful with their privacy online and be cautious when sharing personal information. A simple 'like' can draw

attention to your personal accounts. What you publish is accessible and could be around for a long time, so do consider your content and your privacy carefully.

Trustees and Volunteers must not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material. Rainbow Circus is politically neutral. We can express views where appropriate on policies that impact our work and service users bit it is essential that Rainbow Circus remains, and is seen to be, politically neutral. Charities are legally allowed to campaign to bring about a change in policy or law to further their organisational purpose but can never be party political. In most cases, spending on charity campaigns that are in accordance with charity law will not be regulated under electoral law (often known as the 'Lobbying Act.'

Additionally it is important that Rainbow Circus does not encourage others to risk their personal safety or that of others. For example a video of a stunt or trick in an unsafe location. Rainbow Circus must promote the safe use of Circus equipment and safe procedure when performing and practising the Circus Arts.

It can be challenging working on social media and there may be times where Trustees and volunteers could be subject to unpleasant or abusive comments directed at the charity, our work or people. We encourage everyone who is on social media to be aware of our safeguarding and well-being practices to deal with online abuse and consult with the Safeguarding Lead when necessary.

Staff and volunteers should be vigilant regarding suspicious content or links and must not reveal personal, confidential or sensitive information about themselves, other staff members, volunteers or supporters of Rainbow Circus. Staff and volunteers should be wary of fake accounts that may claim to be Rainbow Circus and should immediately notify the board of Trustees or designated Safeguarding Lead.

Care must also be taken to ensure that any links to external sites from our social media accounts are appropriate and safe. For more information, please see our data protection policy.

Under 18s and vulnerable people

Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming or radicalisation. Where known, when communicating with vulnerable or young people under 18-years-old via social media, staff and volunteers should ensure the online relationship with Rainbow Circus follows the same rules as offline.

Staff and volunteers should be aware that children under the age of 13 should not be encouraged to create their own personal social media accounts or engage with others and are not legally allowed to use social media channels such as Facebook, Instagram or X.

Staff and volunteers should ensure that vulnerable and young people have been made aware of the risks of communicating and sharing information online, and given guidance on security and privacy settings as necessary. Staff and volunteers should also ensure that the site itself is suitable for the vulnerable or young person and Rainbow Circus content and other content is appropriate for them.

Rainbow Circus will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. You could use high privacy settings and password access to meetings to support this.
- The online services we provide are suitable for our service users. For example, we will use age restrictions and offer password protection to help keep people safe .
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow GDPR legislation.
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns. Concerns may be reported using this policy, or direct to a social media provider using their reporting process.

Health and safety

Statement of intent

Rainbow Circus is committed the health and safety of it's workers, volunteers, the public, service users and beneficiaries. We recognise that there are potential risks associated with the Circus environment. We aim to assess the risks for workshops, classes and performances through rigorous risk assessments and mitigate any potential risks.

Risk Assessment

A risk assessment involves looking at hazards and risk. 'Hazard' means anything that could cause harm. 'Risk' is a combination of the likelihood of that happening and the potential seriousness if it did.

Rainbow Circus has detailed risk assessments in the following:

- Circus skills workshop / classes, to include aerial activities.
- Manual handling and circus set up for employees and volunteers.
- Circus performances to include student showcases and public performances of any kind.
- Risk assessments for all individual circus arts activities

These risk assessments should be readily available for any events for organisers, employees, volunteers or beneficiaries to read at any time.

The Management of Health and Safety at Work Regulations 1999

The Management of Health and Safety at Work Regulations 1999 say employers must do risk assessments that identify potential risks to their employees and others who may be affected by their activities. This includes volunteers. If the employer has five or more employees they must write risk assessments down. Please see our employees and volunteer

risk assessment for our workers which prioritises the health, safety and welfare of our employees and volunteers.

The Safeguarding Lead's role in health and safety:

- To make arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of Circus equipment.
- To provide information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of his employees.
- To provide and maintain a working environment for its employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.
- To act upon the feedback of Volunteers and Employees and use it to inform and improve future safe practices.
- To provide Risk Assessments and ensure all employees and volunteers have read and understood them.
- To update Risk Assessments at least annually with accordance with insurance policies.

Guidance for volunteers and employees:

- To read risk assessments for their work within Rainbow Circus and adhere to their recommendations.
- To conduct themselves in a safe manner and ensure the safety of others.
- To manage risks and act where possible to prevent accident or injury.
- To report any health and safety concerns to the Safeguarding Lead.
- To adhere to information, instruction, training and supervision as is necessary to ensure their personal safety, health and welfare.

Induction, training, supervision and support

Induction:

During the induction process all trustees, staff and volunteers will read and sign a confirmation of understanding with regards to our safeguarding policy and procedure. Discussion of the safeguarding policy and other relevant policies will be discussed with the Safeguarding lead or the Trustee lead for safeguarding and child protection including safe working practises, safe recruitment, understanding of safeguarding policy and procedures.

Training:

- All staff who, through their role, are in contact with vulnerable beneficiaries will have access to safeguarding training at an appropriate level.
- Clear and effective reporting procedure outlined in the disclosure guidance and reporting of concerns procedure.
- Guidance and training to be regularly addressed to improve fluency and accuracy of practise, identify barriers in reporting and improvements which can be made.

Support:

We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include: informal and formal debrief and discussions in teams or 1:1, safeguarding agenda within trustee meetings, supervisions with the Safeguarding lead or Trustee Lead for Safeguarding. The Safeguarding Lead and Trustee Lead for Safeguarding will demonstrate and welcome open discussion to identify barriers to reporting so that they can be addressed and overcome. Safeguarding is always a discussion prompt during supervision meetings/appraisals to encourage reflection. Formal supervisions will occur quarterly with the designated safeguarding lead.

Adult to child supervision ratios.

During workshops, public events and performances Rainbow Circus stipulates that children are supervised by their parents/carers.

During classes and tuition Rainbow Circus's insurance stipulates that there is a ratio of 1 adult to 8 children. However to protect beneficiaries, staff and volunteers Rainbow Circus will usually provide 2 adults per 6 children for children under the age of eight, 2 adults for every 8 children for children between the ages of eight and twelve and 2 adults for every fourteen children for children between the ages of thirteen and eighteen.

We also provide a higher ratio for vulnerable adults based on their individual needs.

Reporting bullying, discrimination and inappropriate behaviour

We strongly encourage all of our community to report any instances of bullying or discrimination, either that you are personally subject to or that you witness, while taking part in any of Rainbow Circus's classes, workshops or activities.

You should report anything that doesn't seem right to any member of Rainbow Circus's volunteers, coaches or Trustees. You can report verbally or via email rainbowcircuscio@gmail.com.

However, we also recognise that there may be occasions where you wish to escalate an issue beyond Rainbow Circus's staff, or report an issue anonymously. In this instant there will be a form to complete which can be handed in anonymously on our premises.

We will ensure that your concern is taken seriously and dealt with or escalated, involving the Safeguarding Lead and/or team of Trustees as is appropriate. Depending on the nature of the concern, we may not always be able to let you know the outcome of our process but please rest assured that appropriate action will be taken.

Complaints procedure

We understand that on occasion people or organisations external to the Rainbow Circus may be dissatisfied or concerned about the way the Rainbow Circus, its staff or students have acted. We seek to use feedback to improve the facilities and activities we offer, while always protecting legitimate academic and artistic freedom.

How to make a complaint

If you have cause for complaint about the activities or behaviour of the Rainbow Circus, its staff or students, you are encouraged to try first to resolve the matter informally, in consultation with either the person who has caused the complaint, or with another appropriate person within the area of the organisation where the complaint has arisen.

Should that approach not prove satisfactory, you should put your complaint in writing.

The following are guidelines for making a formal complaint:

- Clearly head your complaint “Formal Complaint”.
- Provide a record of events, with as much information as possible and provide copies of any relevant documents.
- If you have informally discussed matters with any members of staff at Rainbow Circus, please give their full name and provide details of the conversation.
- Write clearly and concisely as to exactly why you are dissatisfied: in particular set out what hardship or injustice you believe you have suffered.
- State clearly what you feel Rainbow Circus should have done differently.
- State clearly from your perspective, how the matter can be put right.
- Complaints should be sent in writing to rainbowcircuscio@gmail.com

Your complaint will then be allocated to the appropriate Trustee who will acknowledge receipt (and, if possible, arrange an initial response) within 7 working days.

In order for a complaint to be considered, it should be received within two calendar months after the date on which the event causing the complaint occurred. If the complaint is received any later, we will exercise discretion as to whether or not to investigate the matter.

What happens next

A response will be made within 30 calendar days of receipt of your complaint. If the investigation cannot be completed in that time for good reason (such as staff unavailability due to leave) or the matter is complex, you will be advised of a revised timescale.

We will maintain confidentiality throughout the complaints process, revealing information to others only to the extent necessary to complete a proper investigation and make a considered response. You should be aware that in some cases, this may involve identifying you as the complainant.

If the complaint relates to the conduct of a student or a member of staff, this may be investigated under the relevant disciplinary procedure. In common with many other organisations and in line with data protection law, it is unlikely to be possible to provide details of the outcomes of any such disciplinary procedure to external parties. However, we are committed to learning broader lessons from such processes, and will amend our policies and procedures in light of relevant findings.

Whistleblowing procedure

Staff and volunteers should feel confident about challenging the behaviour of others and voicing concerns. They should also know who to contact if they feel unable to report an incident within their organisation. They can make a report to the police or local child protection services, or by contacting whistleblowing Advice Line:

- 0800 028 0285
- help@nspcc.org.uk

Safeguarding And Fundraising

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children.
- Staff and volunteers are made aware of the Institute of Fundraising guidance on keeping fundraising safe and the NCVO Guidance on vulnerable people and fundraising.
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.
- We do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.
- We are sensitive to any particular need that a donor may have.

Data Protection

Information will be gathered, recorded and stored in accordance with our child protection records and retention storage procedure.

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding lead.

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

Important Documents and Policy Referenced

Charity Commision 10 Actions for charity trustees

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf

Charity Excellence Framework

https://www.charityexcellence.co.uk/

Code of Fundraising Practise

https://www.fundraisingregulator.org.uk/code/index

Copyright, Designs and Patents Act 1988 Government Guidance

https://www.gov.uk/copyright

Devons LADO

https://www.devon.gov.uk/educationandfamilies/child-protection/managing-allegations-against-adults-working-with-children/

Fundraising that involves children

https://www.fundraisingregulator.org.uk/code/working-with-others/fundraising-involving-children

Government Guidance on Safeguarding duties for Charity Trustees

https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees

Institute of Fundraising guidance

https://www.institute-of-fundraising.org.uk

NSPCC

https://learning.nspcc.org.uk/services/nspcc-helpline

Southwest Child Protection Procedure

(https://swcpp-devon.trixonline.co.uk/chapter/reporting-concerns)

The National Council for Voluntary Organisations

https://www.ncvo.org.uk/help-and-guidance/

UK Safety Internet Centre-Advice for Parents

https://saferinternet.org.uk/guide-and-resource/need-help

UK GDPR Guidance

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/

What to do if you're worried a child is being abused Advice for practitioners (2015)

https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

The Management of Health and Safety at Work Regulations 1999

https://www.legislation.gov.uk/uksi/1999/3242/contents/made