
Safeguarding Policies

Effective From: 18.10.2023

TRS Franchise and The Right Step Dance Company (T0: Medway, Maidstone, Sittingbourne and Gravesend)



SAFEGUARDING POLICIES

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SAFEGUARDING POLICIES

Definitions

When referring to TRS this includes TRS Franchise and The Right Step Dance Company (T0: Medway, Maidstone, Sittingbourne and Gravesend).

When referring to The Safeguarding Policies this includes this document in its entirety including all of its elements and The Safeguarding Policies should be used in conjunction with all of the TRS Policy and Procedure Documents (TRS policies, procedure documents, risk assessments and code of conducts).

When referring to staff this includes Office staff, TRS Teachers, volunteers and any other person working for TRS.

When referring to individuals this includes those participating in dance or movement facilitated by a staff member.

When referring to the organisation this makes reference to the company who have a contract with The Right Step Dance Company and/or the venue in which the class is being held.

Abuse refers to behaviour towards a person or persons that deliberately or intentionally causes harm. There are many forms of abuse and they include, but are not limited to physical abuse, emotional or psychological abuse, sexual abuse, financial or material abuse and neglect.

Safeguarding refers to specifically protecting children and vulnerable adults from abuse and neglect, but also includes anything we can do towards keeping everyone safe including minimizing the risk of accidents and ensuring communication channels are appropriate.

The law defines someone as a child until they are 18 years old.

A vulnerable adult is any person aged 18 or over who is, or may be, unable to take care of him or herself against significant harm or exploitation.

An adult refers to any person over the age of 18 who is not considered vulnerable at the time. Any adult can become vulnerable and this must be taken into account throughout this policy.

Statement

As an organisation we are committed to safeguarding in every area of business and is especially aware of the importance of safeguarding children and vulnerable adults.

TRS strives to provide a work and / or dance environment that safeguards people, no matter what their age, ability, gender, race, origin, sexual orientation etc., against abuse in all of its forms.

TRS aims to ensure robust safeguarding arrangements and procedures whilst providing an appropriate, fun and safe dance environment.

TRS is unreservedly opposed to any form of abuse.

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TRS recognises that organisations have their own policies, procedures, risk assessments, priorities and agendas and aims for the TRS Policy and Procedure Documents to work in conjunction with them.

Communication is paramount to a good safeguarding system and TRS strives to provide an effective system of communication and emphasises to staff the importance of good levels of communication.

Roles and Responsibilities

TRS:

- To lead by example.
- To ensure all staff have a full and clear DBS check with the exception of those who are under the age of 18 or who are attending voluntarily as part of their continued professional development or education. In these cases the staff member will not be left alone with children, young people or vulnerable adults.
- To listen to concerns of staff and individuals and to monitor situations as appropriate.
- To ensure that staff understand and feel comfortable implementing the various policies and procedures available to them.
- To ensure staff are given clear guidelines and role description(s).
- To pass information between the organisation and staff members and vice versa as appropriate.
- To ensure all staff are suitable to work for TRS.

Staff:

- Uphold the statements of this policy in all of their work.
- Incorporate measures into their work that safeguard those they are working with.
- Show commitment to safeguarding.
- To support TRS by ensuring that a member of staff who does not have a DBS check is never alone.
- To lead by example.
- To communicate by using the 'Report Form' and / or the Concerns and Disclosures Procedure and / or other methods of communication appropriate to each situation.

Useful Contacts

Lead Safeguarding Officer

Rebecca Ashton

07850 644 633 or 07851 600 233

rebecca.ashton@therightstepdc.co.uk

Secondary Safeguarding Officer

Georgia Smith

07534 408 976

georgia.smith@therightstepdc.co.uk

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Medway and Kent Police Non-urgent Crime Hotline

In case of non-urgent crime or immediate danger when 999 is inappropriate please phone the following number. You will be diverted to the most appropriate person to respond to your call.

101

Medway Safeguarding Details

Used for reporting a child or vulnerable adult in need if they are not in immediate danger.

Phone 01634 334466 Monday - Friday between 9am - 5pm.

Out of hours - phone 03000 419 191

ss.accessandinfo@medway.gov.uk

Kent Safeguarding Details

Used for reporting a child or vulnerable adult in need if they are not in immediate danger.

Phone 03000 41 11 11 Monday - Friday between 9am - 5pm.

Out of hours - phone 03000 419 191

central.duty@kent.gov.uk

Further and more specific support / contact details can be found on their website,

<http://www.kscb.org.uk/procedures/child-in-need-chin>

Early help and preventative measures

earlyhelp@kent.gov.uk

03000 41 92 22

NSPCC Child Protection Helpline

A free 24 hour service that provides counselling, information and advice to anyone concerned about a child at risk.

0808 800 5000

help@nspcc.org.uk

Ofsted (Office for Standards in Education, Children's Services and Skills)

www.gov.uk/government/organisations/ofsted

enquiries@ofsted.gov.uk

0300 123 466 (About concerns)

CQC (Care Quality Commission)

www.cqc.org.uk

03000 616 161

CEOP (Child Exploitation and Online Protection Command)

www.ceop.police.uk

Safeguarding Children Policy

Policy Statement

Safeguarding and promoting the welfare of children is everyone's responsibility both within and outside of TRS.

All children have the right to be and to feel safe at all times. The purpose of this policy is for this to happen with children who are in our care.

This policy will be used in conjunction with all of the TRS Policies and Procedure Documents, especially the Concerns and Disclosure Procedure.

Children can be abused by an adult's direct actions, inactions and by their indirect actions.

Children can be abused by adults as well as by other young people or children.

Records should be kept whenever there is a concern, disclosure and / or incident that relates to and / or indicates possible abuse or neglect. This includes physical presentations on the child's body, change in the child's moods or behaviour, applicable statements or drawings made by the child and parental behaviour or non-attendance.

Definitions

Safeguarding is the action taken to promote the welfare of children and protect them from harm including, but not limited to abuse and maltreatment.

The law recognises the following categories of abuse under the Children Act (1989).

- Physical
- Sexual
- Emotional
- Neglect

Child on child abuse may also include bullying (in person and cyberbullying).

Data Protection Act (DPA) and General Data Protection Regulation (GDPR) do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Designated safeguarding leads have further information.

Aims and Objectives

- For childrens' needs to be put first at all times. To encourage children to be confident and assertive and for us (TRS and staff) to develop relationships with the children in our care that are based on openness, honesty, mutual trust and respect so that they know they will be listened to and believed.
- For staff to recognise what safeguarding is and why it is important.
- For staff and individuals to be confident that concerns and disclosures will be believed and procedure followed swiftly.
- For organisations to feel that their policies and procedure have been taken into account in the implementation of this policy.

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TRS Responsibilities

- To provide a point of contact for concerns and disclosures from / via staff, organisations or individuals.
- To support staff throughout any issues relating to safeguarding.
- To investigate disclosures and concerns in relation to the relevant procedure.
- To keep a record of staff training.
- To lead by example.
- To maintain appropriate confidentiality.

Staff Responsibilities

- To be aware of safeguarding systems in place within TRS and the organisations they visit.
- To undergo regular, formal and in person safeguarding children training (every three years) and to send certification to TRS.
- To develop their understanding of all types of abuse and to know how to respond to a child who discloses abuse.
- To be aware of what Female Genital Mutilation (FGM).
- To follow their training and all TRS Policy and Procedure Documents in their work and when encountering a situation involving safeguarding.
- Will not engage in any form of behaviour that constitutes any form of abuse.
- To remain vigilant.
- To follow their legal duty to pass on their concerns, children's disclosures, any safeguarding related incidents (including if a child touches them in an inappropriate place, be this deliberate or an accident) to the appropriate person and to follow the relevant procedure.
- To maintain appropriate confidentiality.
- To lead by example.
- To ask the organisation if there is anything they need to know before each session.
- To ensure that outside adults (those who are not staff or part of the organisation) aren't present when children change.
- To support children in an appropriate way whilst they change.
- Promote the welfare and best interests of participants.
- To not meet with children outside of organised activities.

Do not assume someone else will deal with it. Safeguarding is everyone's responsibility.

Further Advice and Support:

NSPCC Child Protection Helpline

A free 24 hour service that provides counselling, information and advice to anyone concerned about a child at risk.

0808 800 5000

help@nspcc.org.uk

Safeguarding Vulnerable Adults Policy

Policy Statement

Everyone has the right to live in safety, free from abuse and neglect. The purpose of this policy is for this to happen with the vulnerable adults who are in our care.

This policy will be used in conjunction with all of the TRS Policies and Procedure Documents, especially the Equality and Diversity Policies.

Abuse can happen anywhere.

Adults can be abused by an adult's direct actions, inactions and by their indirect actions.

Records should be kept whenever there is a concern, disclosure and / or incident that relates to and / or indicates possible abuse or neglect. This includes physical presentations on the adult's body, change in their moods or behaviour, applicable statements or drawings made by the adult and family / carer behaviour or non-attendance.

Choice is paramount. All adults should have the opportunity to select independently from a range of options based on clear and accurate information and should be supported to do so if their specific needs make this difficult for them in any way at the time.

Members of Staff who are Active Armchairs Facilitators and therefore come in regular contact with Vulnerable Adults will take part in formal Safeguarding Of Vulnerable Adults Training (SOVA Training) on a regular basis (a minimum of every three years).

Definitions

The following categories are recognised as abuse when referring to vulnerable adults.

- Physical
- Sexual
- Psychological
- Neglect
- Financial
- Institutional
- Discriminatory

Consent is a clear indication of willingness to participate in an activity or to accept a service. It may be signalled verbally, by gesture, by willing participation or in writing. No one can give, or withhold, consent on behalf or another adult unless special provision for particular purposes has been made for this, usually by law.

Aims and Objectives

- For vulnerable adults to maintain their independence and to feel fulfilled as far as is possible during our classes and, where applicable, at work.
- For participant's needs to be put first at all times and for us (TRS and staff) to develop relationships with those in our care that are based on openness, honesty, mutual trust and respect so that they know they will be listened to and believed.
- For staff to recognise what safeguarding is and why it is important.

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- For staff and individuals to be confident that concerns and disclosures will be believed and procedure followed swiftly.
- For organisations to feel that their policies and procedure have been taken into account in the implementation of this policy.

TRS Responsibilities

- To provide a point of contact for concerns and disclosures from / via staff, organisations or individuals.
- To support staff throughout any issues relating to safeguarding.
- To investigate disclosures and concerns in relation to the relevant procedure.
- To keep a record of staff training.
- To lead by example.
- To maintain appropriate confidentiality.

Staff Responsibilities

- To undergo regular formal SOVA training and to send certification to TRS.
- To develop their understanding of all types of abuse and to know how to respond to an adult who discloses abuse.
- Will not engage in any form of behaviour that constitutes any form of abuse.
- To remain vigilant.
- To follow their legal duty to pass on their concerns, vulnerable adult's disclosures, any safeguarding related incidents to the appropriate person and to follow the relevant procedure.
- To maintain appropriate confidentiality.
- To lead by example.
- To ask the organisation if there is anything they need to know before each session.
- To support adults in an appropriate way as their training and relevant experience suggests.
- Promote the welfare and best interests of participants.

Further Advice and Support:

CQC (Care Quality Commission)

www.cqc.org.uk

03000 616 161

Intimate Care Policy

Intimate care is not the responsibility of TRS or staff because the organisation must have the appropriate care in place for those who need it. Examples of intimate care include going to the toilet and providing medical support such as medicines or injections. The only exceptions to this may be things that are covered in the First Aid Policy (See Health and Safety Policies Document).

General Data Protection Regulation Policy

Policy Statement

General Data Protection Regulation states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. The Right Step Dance Company is committed to protecting the rights and freedoms of individuals with respect to the processing of participant's, parent's, staff member's and visitor's personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

The Right Step Dance Company and TRS Franchise are both registered with the ICO (Information Commissioners Office). Copies of the certificates can be requested or viewed at head office.

This policy will be used in conjunction with the Child Collection Policy, Enrolment and Consent Policy and Social Media and Websites Policy as well as the related documents and other policies as they apply.

Further details can be found in the TRS Audit document that is available when requested from the Data Protection Officer.

Definitions

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018.

Data Subject or Individual is the person who's data is being held or processed.

Rebecca Ashton, company director is, as business owner, responsible for all data and is known as the Data Controller. She is also the designated Data Protection Officer.

A Data Processor is any person who processes data on behalf of the data controller.

Processing is obtaining, recording, holding or carrying out any operation with data.

Aims and Objectives

- To implement and fully integrate the aims and objectives of GDPR into the daily running of The Right Step Dance Company and affiliated companies.
- To fulfil the seven rights for individuals as set out in GDPR.
- For all decision makers and key people at TRS to demonstrate support for data protection legislation and to promote a positive culture of data protection compliance.

Seven Rights For Individuals

1) The right to be informed

- TRS works with members of the public, staff members and organisations and, as a result, is required to collect and manage certain data to safeguard participants and to ensure the delivery of high quality, accessible and appropriate classes. This is in respect of our Health and Safety, Equality and Safeguarding Policies.
- TRS is required to hold data on its staff; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID such as passport and driver's license, bank details, training information, DBS Numbers and date of issue. This information is required as proof of eligibility to work in the UK and as proof that the staff member is trained and able to fulfil their role. Information is held on SOMP (Secure Online Management Portal).

2) The right of access

- At any point an individual can make a request relating to their data and TRS will need to provide a response (within 1 month). TRS can refuse a request, if we have a lawful obligation to retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

3) The right to erasure

- An individual has the right to request the deletion of their own data where there is no compelling reason for its continued use.
- TRS has a legal duty to keep children's and parent / carer details for a reasonable time. TRS will keep general details whilst a child participates in class, recorded image consent and children's accident and injury records for 19 years (or until the child reaches 21 years), and Child Safeguarding records for 22 years (or until the child reaches 24 years).
- Staff records must be kept for 5 years after the member of leaves employment, before they can be erased as recommended by HMRC.
- If a physical copy of this information is held it will be shredded. If it is a digital copy it will be deleted. Where information is held on SOMP (Secure Online Management Portal) it will be deleted from the archive when appropriate.

4) The right to restrict processing

- Parents, visitors and staff can object to TRS processing their data. This means that records can be stored but must not be used in any way, for example for communications.

5) The right to data portability

- TRS requires data to be transferred from one IT system to another; such as from one staff member to another. Secure transfer routes are used in these cases.
- When physical data is transported by a staff member that member of staff must ensure the information is stored securely when it is not on their person. For example, if they keep it at home before bringing it to the office, they will store it in a locked cupboard.

6) The right to object

- Parents, visitors and staff can object to their data being used for certain activities like marketing or research.

7) The right not to be subject to automated decision-making including profiling.

- Automated decisions and profiling are used for marketing based organisations. TRS does not use personal data for such purposes.

TRS Responsibilities

- To support staff in complying with this policy.
- To manage information risks or breaches appropriately and effectively.

Staff Responsibilities

- Staff who are contracted freelancers are responsible for their own GDPR, but are also required to collect and keep safe personal information as requested by TRS.
- Staff who are volunteers are not responsible for collecting personal data and, if they find themselves in a position where they are asked to do so, they must find an alternative option.
- To demonstrate support for data protection legislation and to promote a positive culture of data protection compliance
- To report information risks or breaches to the relevant data controller, processor or to the Data Protection Officer.
- As freelancers, staff must comply with GDPR and be registered with ICO if required.

Storage and use of personal information

- All paper copies of personal information are stored in a locked cupboard at the TRS office. These records are shredded after the retention period.
- Information about individuals is used in certain documents, such as, registers. These documents include data such as names, and sometimes contact details. These records are shredded after the relevant retention period.
- Emergency Contact details are only used in case of emergency such as illness, injury or safeguarding related emergencies. The person who provides the emergency contact details is responsible for gaining permission for TRS to hold the details on our behalf.
- TRS stores personal data held visually in photographs or video clips or as sound recordings. No participant names are stored with images in photo albums, displays,

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on the website or on TRS social media sites. See the Recorded Image Policy for further details.

- Access to all computers use by office staff is password or PIN protected. Any portable data storage used to store personal data must also by password or PIN protected, but this is avoided through the use of Dropbox, Wetransfer and other GDPR compliant online services.
- TRS Office Staff use Dropbox and this means personal information will be stored on Dropbox. Dropbox is GDPR compliant. For more information see this web page: https://www.dropbox.com/en_GB/security/GDPR (Last accessed 20.06.18)
- TRS Office Staff use SOMP, a Secure Online Management Portal designed for TRS by Snapwire. It is hosted via Microsoft Azure. Personal information about TRS Staff and information, including contact details, about organisations is held on SOMP. Microsoft Azure is secure. See this web page for more information: <https://www.microsoft.com/en-us/trustcenter/cloudservices/azure> (Last accessed 20.06.18)
- GDPR means that TRS must;
 - * Manage and process personal data properly
 - * Protect the individual's rights to privacy
 - * Provide an individual with access to all personal information held on them

Legitimate Interest

This allows TRS to email other companies about things that are of a legitimate interest to them. For example, when emailing staff about other dance relate opportunities or when emailing organisations about offers specific to their organisation type. TRS will not use this right with individuals who have provided their personal information other than when it is provided in relation to our newsletter's mailing list.

Useful Contacts

Data Protection Officer

Rebecca Ashton

07850 644 633 or 07851 600 233

rebecca.ashton@therightstepdc.co.uk

Child Collection Policy

The majority of TRS classes are held within another organisation such as a school or youth centre and TRS have a contract with the organisation. Where this is the case it is usually not the TRS staff member's responsibility to show children out to parents / carers or allow them to leave on their own. The organisation must provide someone to do this. The TRS staff member does not know parents / carers and so it is not safe for them to do this.

In special circumstances a dance teacher may show children out to parents / carers and to allow this to take place, the following measures will be taken.

- The organisation will send a letter home to the relevant parents / carers to inform them of the change. This letter will include a tick box to acknowledge the change and space for the parent / carer to include an optional 'secret password' that can be used if an alternative person collects the child.
- The organisation will provide passwords to the TRS Teacher.
- The organisation must provide a staff member to show children out to parents / carers the first time so that the TRS Teacher may familiarise themselves with the parents / carers.
- If the TRS Teacher has the right and obligation to speak to the relevant organisation staff member if they have any doubt about showing a child out to the person who has arrived to collect them.

Where a class is run by TRS and not by an organisation (even if on the organisation's premises) the TRS Teacher, must do everything in their power to ensure they fulfil their due diligence and that the children are passed onto the correct adults. They may use the following options to support them in this.

- Use the register to sign participants out.
- Ensure participants wait to leave one at a time so they can be asked one at a time who they are going with and what their relationship to that person is.
- Use an enrolment form that asks parents / carers to add with whom their child will be leaving and ensure the enrolment form is used.
- If in any doubt the TRS Teacher may stay with the child and make the relevant checks such as speaking to the relevant person at the venue or to the safeguarding officer at TRS.
- If there is a possible safeguarding issue speak to the safeguarding officer at TRS and follow the Child Safeguarding Policy and Procedures.
- Always do your due diligence.
- No child under the age of 11 or 12 (primary school age) will be allowed to walk home alone and prior permission must be sought for participants aged 11 or 12 – 18 years (secondary school age).

Enrolment and Consent Policy

TRS is committed to supporting TRS Teachers to deliver safe and effective dance classes.

TRS recognises that most often the organisations enrol the participants themselves and that the TRS Teacher delivers classes on their behalf. The Enrolment sections of this policy relate to classes such as social dance that are run by TRS and not by an organisation.

For 2nd Approach lessons, consent and enrolment may take place within the online booking system and so TRS Teachers will use digital information to inform their decisions rather than printed forms.

No photograph or video of a child or vulnerable adult whose parent / carer / relevant responsible adult does not give consent will be taken.

Any participant may refuse to be photographed or filmed even if consent has been provided and then they will not be filmed or photographed.

Adults must have capacity to consent when giving verbal or written permission and the appropriate staff member(s) can make this determination.

No child or vulnerable adult will be named with a recorded image unless further permission is granted.

At the very least verbal confirmation of consent will be given by the relevant adult accompanying child or vulnerable adult participants. For example, this will be the case when a manager is in the room with participants who have already provided consent to the organisation for external organisations / third party organisations to use recorded images.

Public events organised by TRS or otherwise may involve recorded images where prior permission has not been sort and this will be discussed for each event separately.

Personal Information will not be shared as per the GDPR policy.

Definitions

Recorded Image refers to photographs, film and other digital forms of visual communication.

An enrolment form will include personal details and may include a PAR-Q Form.

PAR-Q stands for Physical Activity Readiness Questionnaire.

Aims and Objectives

- To support TRS Teachers as they deliver safe and effective dance classes.
- To safeguard children and vulnerable adults when obtaining consent.
- To safeguard children and vulnerable adults when recorded images are shared.
- To provide choice and opportunity to participants.

TRS Responsibilities

- To ensure staff know which forms are required for their classes.
- To ensure staff have the correct forms when they require them and to respond promptly when staff request further forms.
- To update forms as necessary to ensure they stay within current legislation etc.
- To keep all personal data safe and in accordance with GDPR.

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- To keep enrolment and consent forms for children for 19 years or until the child mentioned in the form is at least 21 years old.

Staff Responsibilities

- To ensure they know what is appropriate by reading further advice and asking questions of TRS management staff.
- To inform TRS when they need further forms.
- To ensure they receive, read and understand a form for every participant in classes where enrolment and/or consent forms are used.
- To keep enrolment forms in a folder and in alphabetical order by first name so that they can be quickly accessed in case of emergency. When not in class these forms must be kept safely in accordance with the GDPR policy as they contain personal information. As freelancers, TRS Teachers must be aware of GDPR and have their own policy and procedure in place to comply with it.
- To keep a note of participants whom they have / have not got consent for.
- To give enrolment forms to TRS at the appropriate time. E.g. at the end of term or when a participant leaves the class.
- The staff member will not keep copies of forms once they have been returned to TRS.
- To take photographs/video as requested by TRS. The member of staff must not use the recorded images themselves and will delete them (including in the Cloud) once they have ensured the recorded images are with TRS.
- To repeat the form process as TRS requests. E.g. If the form has been updated or once per year.

Further Information and Support:

Mental Capacity Act

Information about the Mental Capacity Act and those who may / may not have the capacity to consent.

<https://www.nhs.uk/conditions/social-care-and-support-guide/making-decisions-for-someone-else/mental-capacity-act/>

Assessing Capacity

Information about capacity and how someone might determine an adult's capacity to consent

<https://www.nhs.uk/conditions/consent-to-treatment/capacity/>

NSPCC Guidance for photographing and filming

Information about creating the right balance between creating opportunity for children and young people to feel proud whilst also safeguarding them from harm.

<https://learning.nspcc.org.uk/research-resources/briefings/photography-sharing-images-guidance#article-top>

Social Media and Websites Policy

The widespread availability and use of social media applications bring opportunities to understand, engage and communicate in new and exciting ways. It is important to find the balance so that these services may be used safely, effectively and flexibly.

TRS recognises that everyone has the right to self-expression and also recognises that self-expression on social media websites should be appropriate in order to safeguard the children and vulnerable adults we work with as well as the reputation of TRS as an organisation.

The Social Media Policy and Recorded Images Policy will be used in conjunction with each other.

Definitions

Social Media are websites and applications that enable users to create and share content or to participate in social networking. This includes, but is not limited to blogs, online discussion forums, Facebook, Twitter, Pinterest, YouTube, comment streams and other websites.

Many of the principles of this policy also apply to other types of online presence such as virtual worlds.

Aims and Objectives

- For organisations to feel that their policies and procedure have been taken into account in the implementation of this policy.
- To safeguard staff, individuals, organisations and TRS.
- To protect the reputation staff, individuals, organisations and TRS.
- To ensure that social media users are able to clearly distinguish where information provided via social media is legitimately representative of TRS.
- For this policy to work in conjunction with GDPR.

TRS Responsibilities

- To lead by example.
- To maintain appropriate confidentiality.

Staff Responsibilities

- To develop their understanding of what is appropriate to put on social media and what is not.
- Staff will safeguard other staff, the individuals and organisations they have worked with or are currently working with in any social media posts they make.
- Staff will not make negative comments about their work at TRS on social media or the internet.
- To remain vigilant and to maintain appropriate confidentiality.
- To lead by example.
- Staff will not invite, accept or engage in communications with individuals, including parents, from an organisation's community. The only exception to this is when this relationship had formed prior to the staff member's work with TRS.
- Any communication received from a child or vulnerable adult via social media must be reported to TRS.

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- Staff members are strongly advised to set all privacy settings to the highest possible levels on all personal social media accounts.
- Staff members should not use personal email accounts or social media to communicate with organisations about TRS business. Office staff will use their designated TRS email address. Other staff members will refer the communication onwards so that TRS may take the appropriate approach.
- Staff should not accept any current participant of any age or any ex-participant under the age of 18 as a friend, follower, subscriber or similar on any personal social media account.
- Staff should not engage in any direct messaging to participants where through social media where the message is not public.
- Staff may use social media as sanctioned by TRS. For example to create an events page that they have specifically been asked to create.

Further Information and Support:

CQC (Care Quality Commission)

CEOP is a law enforcement agency and is here to help keep children and young people safe from sexual abuse and grooming online.

www.ceop.police.uk

Get Safe Online

Free expert advice about all aspects of the web including social media and both in business and in personal life.

www.getsafeonline.org

NSPCC 'Share Aware'

An advice page on their website about children using social media.

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety>

Safer Internet

Online safety tips, advice and resources to help children and young people stay safe online.

www.saferinternet.org.uk

Remote Lessons Policy

Due to the Covid-19 Outbreak, March 2020, a new way of working has been introduced to The Right Step Dance Company. Some lessons will now be available online in the form of online 'meetings' using software such as 'Zoom Video Conferencing' and pre-recorded lessons available in the form of a DVD or on video sites such as Vimeo. This presents a new set of considerations. It is also a very new approach for the entire industry and, as a result, we will all be learning and developing our approach as we work.

Definitions

Remote Lessons refers to any lesson where the TRS Teacher is not in the same physical location as the class. This is achieved through the use of online live lessons, online videos and pre-recorded DVDs.

Application refers to downloadable software for mobile devices.

Meetings refers to the online lessons. This term is used because the software used is adapted from conferencing software that is originally used for business meetings.

Aims and Objectives

- For organisations to feel that their policies and procedure have been taken into account in the implementation of this policy.
- To safeguard staff, individuals, organisations and TRS.
- To protect the reputation staff, individuals, organisations and TRS.
- To ensure that The Right Step's lessons reach the high standard expected by staff, individuals, organisations and TRS.
- For this policy to work in conjunction with GDPR.

TRS Responsibilities

- To lead by example.
- To maintain appropriate confidentiality.
- To continually review the processes.
- To support staff in their delivery when they ask for additional help.
- To safeguard all users data in accordance with GDPR.
- The invitation should be sent with an accompanying note stating, "The following link must not be forwarded to anyone who is unauthorised to take part in the lesson."
- To not take screen shots of participants unless prior permission has been given in accordance with the Recorded Images and GDPR policies and to make organisations aware that they also cannot do this.

Staff Responsibilities

- To develop their understanding of what is appropriate for online lessons.
- Staff will follow all relevant Policy and Procedures during remote lessons including the Remote Lessons Policy and Health and Safety in Remote Lessons Policy.
- Where the TRS Teacher is named host in a live remote lesson the written name, profile picture and virtual backgrounds should be professional and appropriate.
- In a live remote lesson, under Share Screen, the Host should disable anyone else from sharing their screens and should not share their screen at any time. In a pre-

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recorded session, wherever possible, the host should disable any participants from recording the lesson.

- In live remote lessons, registers must still be kept in accordance with GDPR for all lessons with under 18s. Once the register has been taken, the meeting should be locked before commencing the lesson.
- Staff will safeguard other staff, the individuals and organisations they have worked with or are currently working with within any remote lesson.
- To remain vigilant and to maintain appropriate confidentiality.
- To lead by example and to always use the internet in an acceptable way.
- Staff members are strongly advised to set all privacy settings to the highest possible levels on all technology.
- Consider the security on devices including cameras and microphones.
- Staff should not engage in any direct private messaging to participants where the message is not public.
- Staff may only hold TRS remote lessons when appropriately sanctioned by The Right Step.
- Ensure the physical space they are using for remote lessons is appropriate, including an appropriate background. Staff must remove any inappropriate items before the start of the lesson.
- Ensure there are no inappropriate external interruptions to the lesson.
- To use the TRS Teacher Code of Conduct in an appropriate way for remote lessons.
- To safeguard all users data in accordance with GDPR.
- To not take screen shots of participants unless prior permission has been given in accordance with the Recorded Images and GDPR policies.
- Have two devices connected live to the lesson to ensure that, if one drops out, there is an immediate back up available.

Further Information and Support:

Zoom

The main remote working platform used for TRS remote lessons.

www.zoom.us

Safer Internet

Online safety tips, advice and resources to help children and young people stay safe online.

www.saferinternet.org.uk

Whistle Blowing Policy

Whilst all staff members at TRS are self-employed, we also have a duty of care to everyone we work with including staff and participants.

TRS is committed to maintaining the highest standards of integrity and accountability. This whistle-blowing policy is designed to encourage staff, including volunteers, to report concerns related to the safeguarding of children and vulnerable adults and to feel safeguarded themselves when doing so.

Definitions

This policy covers observed or suspected misconduct, unethical behaviour or potential harm whilst undertaking TRS activities.

Wrongdoing refers to misconduct, unethical behaviour or potential harm.

Whistle blower refers to the individual who, in good faith, reports wrongdoing.

Aims and Objectives

- For organisations to feel that their policies and procedure have been taken into account in the implementation of this policy.
- To safeguard staff, individuals, organisations and TRS.
- To encourage transparency
- To safeguard against retaliation
- To safeguard the reputation staff, individuals, organisations and TRS.
- To ensure that The Right Step's lessons reach the high standard expected by staff, individuals, organisations and TRS.

TRS Responsibilities

- To lead by example.
- To ensure thorough and appropriate investigation even if this is undertaken by an external organisation.
- To treat reports confidentially and to safeguard the whistle-blower from retaliation.
- To take action if retaliation against whistle-blowers takes place.
- To prove and then take action in cases of false report.

Staff Responsibilities

- If a staff member has reasonable grounds to believe that wrongdoing has occurred or is likely to occur, they should report it immediately to the relevant person within TRS or, if urgent, the organisation they are visiting.
- Staff members will not retaliate against whistle-blowers and understand that actions will be taken should this occur.

Further Information and Support:

ACAS (Advisory, Conciliation and Arbitration Service)

Provides guidance on workplace policies and procedures including whistle-blowing.

<https://www.acas.org.uk/>

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Whistleblowers UK

Provides Information and support for whistle-blowers.

<https://www.wbuk.org/>

Appendix 1 – National Support Organisations Online

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Children

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support Relating to Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Support Relating to Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Violence

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- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Support Relating to Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- Parent Port: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Appendix 2 – Kent Specific Additional Useful Contacts

KELSI – List of Education Safeguarding Service Contacts

www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts

Contact details for Online Safety within the Education Safeguarding Team

Ashley Assiter, e-Safety Development Officer, 03000 415797, esafetyofficer@kent.gov.uk
(non-urgent issues only)

Contact details for the LADO (Local Authority Designated Officer), Kent

Telephone: 03000 410888

Email: kentchildrenslado@kent.gov.uk

Early Help and Preventative Services

earlyhelp@kent.gov.uk

03000 419222

Kent Safeguarding Children Board (KSCB)

kscb@kent.gov.uk

03000 421126