

c21 Theatre Company

Safeguarding Children and Adults at Risk Policy

1. STATEMENT OF INTENT

c21 Theatre Company are committed to safeguarding the welfare of all children and adults at risk with whom we come into contact with by doing our utmost to protect them from neglect and physical, sexual, and emotional abuse. It is the policy of the company to promote the best interests and welfare of children and adults at risk, this principle is enshrined in both the Children Order (Northern Ireland) 1995, the Safeguarding of Vulnerable Groups (Northern Ireland) Order 2007 and underpinned by the UN Convention on the Rights of the Child.

c21 will safeguard children and adults at risk by adopting and implementing its Safeguarding policy. This Safeguarding Children and Adults at Risk policy (hereafter known as 'the Policy') has been approved by the Board of Trustees.

2. DEFINITIONS

The Northern Ireland Executive, through the Department of Health, is responsible for child protection in Northern Ireland. They set out policy, legislation and statutory guidance on how the child protection system should work.

The Safeguarding Board for Northern Ireland (SBNI) co-ordinates and ensures the effectiveness of work to protect and promote the welfare of children. The board includes representatives from health, social care, the police, the probation board, youth justice, education, district councils and the NSPCC. The SBNI is responsible for developing policies and procedures to improve how different agencies work together.

2.1 Definition of Safeguarding

Safeguarding means:

- protecting children or adults at risk from abuse and maltreatment
- preventing harm to a child or adult at risks' health or development
- ensuring a child or adult at risk has the provision of safe and effective care
- taking action to enable all children and adults at risk to have the best outcomes.

2.2 Definition of a child:

A child is defined as anyone under the age of 18.

2.3 Definition of an adult at risk:

An adult at risk is a person who is 18 years old or over who is or may be in need of community care services by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation.

2.4 Definition of abuse

Defining abuse is a complex issue. All staff and volunteers should be made aware of what constitutes abuse:

- **NEGLECT** is the actual and persistent failure to meet the basic needs or important aspects of care, resulting in the significant impairment of the health or development, including failure to provide adequate food, shelter and clothing OR neglect of a child or adult at risks' emotional needs
- **PHYSICAL ABUSE** includes hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk including fabricating the symptoms of, or deliberately causing, an adult at risks' ill-health
- **EMOTIONAL ABUSE** is the actual and persistent emotional ill-treatment or rejection resulting in severe adverse effects on the child or adult at risks' development. This may include conveying to a child or adult at risk that they are worthless, unloved, and inadequate, or where impossible expectations are placed upon a child or adult at risk. It may also involve regularly exploiting, corrupting, or frightening a child or adult at risk.
- **SEXUAL ABUSE** involves forcing a child or adult at risk to take part in sexual activities, whether or not the child or adult at risk is aware of the activity or is involved in sexual activities that they are unable to give informed consent or that violate social taboos or family roles. Child Sexual Exploitation (CSE) is a form of sexual abuse in which a person(s) exploits, coerces and/or manipulates a child or young person into engaging in some form of sexual activity in return for something the child needs or desires. Harmful Sexual Behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour.
- **FINANCIAL OR MATERIAL ABUSE** involves theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.
- **DISCRIMINATORY ABUSE** involves abuse based on a person's race, gender, sexuality, disability, religious and/or political beliefs and can take the form of

harassment, slurs, or similar mistreatment.

- **INSTITUTIONAL ABUSE** is repeated instances of poor care of individuals or groups of individuals. It can be through neglect or poor professional practice as a result of structures, policies, processes and practices within an organisation. While this in no way condones the abusive practice on the part of individuals, it recognises the powerful influence that organisational culture has on individual behaviour.

The above list should not be considered an exclusive or even exhaustive list of the types of abuse which can be experienced by children and adults at risk and the majority of the above abuse can also happen online.

3. GUIDING PRINCIPLES

The following principles outline our commitment to a robust children and adults at risk safeguarding policy and procedures.

- The welfare of the child and adult at risk is paramount. At all times, the protection of the child and adult at risk must be the primary concern of all staff and volunteers. This policy takes precedence over all other c21 Theatre Company policies and procedures.
- Effective training and adequate resources will be provided for staff and volunteers to ensure that they have the skills, knowledge, and resources to recognise and respond to children or adults who may be at risk or have been abused. This training will recognise that safeguarding issues take many forms and these include online safety and child sexual exploitation.
- Children and adults at risk have the right to be listened to, consulted, and involved in decisions whenever possible. They shall be kept involved and kept informed of decisions and actions taken unless to do so places a child or adult at further risk.
- Dealing with suspected or known incidents of abuse to a child or adult at risk will take priority over any other work.
- Carers should, where possible, be kept informed and involved in discussions and decision making about the needs of their children and adults at risk and treated with honesty and respect.
- If there is a potential conflict between the needs of the child or adult at risk and their carer, the child's or adult at risk's needs must come first.
- Co-operation with other agencies, especially those with a legal responsibility for the safeguarding of children and adults at risk are necessary in all incidences. There should be clear and agreed communication established from the outset.
- Where concern exists that a person in contact with the agency may be a risk to children or adults at risk, c21 Theatre Company will endeavour to ensure

that they are prevented from having access to children or adults at risk and their involvement with the company will be suspended pending investigation.

- c21 Theatre Company believes that in order to be effective in safeguarding children and adults at risk, all agencies involved should work together and have a shared mutual understanding of aims, objectives and good practice.
- The Safeguarding of children and adults at risk is an extremely serious matter and as such individual cases must not be discussed outside the company except to the appropriate agencies i.e. Social Services, NSPCC, or PSNI.

NO ABUSE IS ACCEPTABLE AND SOME ABUSE IS A CRIMINAL OFFENCE AND MUST BE REPORTED TO THE PSNI IMMEDIATELY.

4. RIGHTS & RESPONSIBILITIES

c21 Theatre Company staff and volunteers have no authority to investigate allegations of abuse. However, if a disclosure or allegation is made, they have a responsibility to act, and it is ESSENTIAL they do so.

4.1 Designated Safeguarding Officer and Adult Safeguarding Champion

c21 Theatre Company has appointed a Designated Safeguarding Officer (DSO) and an Adult Safeguarding Champion (ASC) who are responsible for ensuring that staff and volunteers are supported when necessary to protect children and adults at risk. They are:

- Designated Safeguarding Officer - Dearbhla Holohan, Board of Trustees
- Adult Safeguarding Champion - Stephen Kelly, Creative Director

Refer to Appendix 1 for contact details.

4.2 Staff, volunteers, patrons, and programme participants of c21 Theatre Company are subject to and must be aware of the Policy. It is the responsibility of the Artistic Director to ensure that the policy is regularly reviewed, freely available and implemented throughout the company.

4.3 If abuse is identified or suspected this must be discussed immediately with one of the Designated Safeguarding Officers/Adult Safeguarding Champion and the appropriate agencies must be notified, ensuring that all relevant actions are taken and that the child or adult at risk is protected, and the staff member or volunteer is fully supported. All concerns or disclosures must be recorded, and a signed copy stored securely by the Safeguarding Officer/Adult Safeguarding Champion.

4.4 Where appropriate to a given project AccessNI checks will be processed in relation

to the recruitment of staff and volunteers.

4.5 The Child or Adult at risk has the right:

- to be made aware of this policy
- to have alleged incidents recognised and taken seriously
- to receive fair and respectful treatment throughout
- to be involved in any process as appropriate
- to receive information about the outcome.

4.6 All those making a complaint or allegation or expressing concern, whether they be a child or adult at risk should be reassured that:

- they will be taken seriously
- their comments will usually be treated confidentially but their concerns may be shared if they or others are at risk
- they will be given immediate protection from the risks of reprisals or intimidation.

5 PROCEDURES: REPORTING CONCERNS

It is the responsibility of all c21 Theatre Company staff and volunteers to take seriously any suspicion, disclosure, or any signs of abuse both past and present that is affecting or may affect children and adults at risk. It is important to consider that information about abuse no matter how dated may indicate that other children or adults may be at risk.

Safeguarding issues may come to the attention of staff, volunteers, children, and adults at risk in the following ways:

- Direct observation
- Observation of signs and symptoms
- Information provided by a third party (eg another child/adult at risk or worker)
- Disclosure by a child or adult at risk themselves
- Staff and volunteers will receive training which will enable them to implement this policy and procedure.

5.1 Significant harm is an important threshold when considering the nature of intervention required and involves not only ill-treatment (including sexual abuse and forms of ill-treatment which are not physical), but also the impairment of physical, intellectual, emotional, social, or behavioural development. Where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child (Children's Order NI 1995 Article 50 (3)).

5.2 All allegations or suspicions are to be treated seriously. No abuse is acceptable, and

some abuse is a criminal offence and must be reported to the PSNI as soon as possible.

5.3 If a staff member or volunteer has suspicions, evidence, or it has been disclosed to them that a child or adult is at risk of, is being, or has been abused then the situation must be discussed with a Designated Safeguarding Officer or Adult Safeguarding Champion. In the situation where no Safeguarding Officers or ASC are available, and it is felt that an immediate response is necessary then the following action must be taken:

- Ensure the immediate safety of the child or adult at risk
- Concerns must be reported formally, first verbally and then in writing
- If the child or adult at risk has a social worker they must be informed, and where they do not have one the Gateway team or duty social worker must be contacted. The concerns must be reported formally
- If out of hours, the Regional Emergency Social Work Service must be contacted (details in Appendix 2)
- In situations of immediate danger contact emergency services, PSNI, Ambulance, GP etc.
- The child or adult at risk should be informed of any action to be or already taken if deemed appropriate and does not place the child or adult at further risk
- All reports should be followed up within 24 hours both verbally and in writing
- Concerns and any action taken must be recorded and reported to the Safeguarding Officer/Adult Safeguarding Champion who will record it in a 'confidential incidents file'.

5.4 Where an adult at risk expresses a wish for concerns not to be pursued then this should be respected whenever possible. However, decisions about whether to respect the adult at risk wishes must have regard to the level of risk to the individual and others, and their capacity to understand the decision in question. In some circumstances the wishes of the adult at risk may be overridden in favour of considerations of safety.

6 DISCLOSURE GUIDELINES

Children and adults at risk rarely make a disclosure spontaneously – it may take weeks or months for a child or adult at risk to talk about his/her experiences. Never promise to keep information that you are being told a secret. If a child or adult at risk is telling you it is because he/she wants it to stop. Carefully explain that because of the nature of the disclosure you are required to pass this information on to the relevant agency.

Always let the child or adult at risk know who you are going to tell and the implications of telling them.

- Stay calm and reassuring
- Find a quiet place to talk, inform colleagues that this is occurring ensuring that actions

cannot be mistaken for collusion

- Take seriously what the child or adult at risk is telling you
- Listen and do not press for information
- Do not ask leading questions
- Acknowledge the child/adult at risk's confused feelings stressing that it is not their fault
- Follow the procedures (outlined in this policy)
- Do not attempt to deal with the matter further on your own informing the child/adult at risk of your intended actions and reasons for them.
- Discuss disclosure with a Designated Safeguarding Officer or Adult Safeguarding Champion at c21 Theatre Company
- Record the conversation as soon as possible.

7 RECORDING

- It is important that timely and accurate records are kept about any safeguarding concerns relating to a child or adult at risk
- Staff or volunteers must record information on the Safeguarding incident report (see Appendix 4) and complete the checklist as soon as possible and no more than 24 hours after any issue concerning actual or suspected abuse against a child or adult at risk
- All records must be signed, dated, and timed. Records should be an account of factual information and any view/judgement expressed about these facts should be clearly qualified as such.
- Records need to cover four specific areas:
 - 1. Everything and everyone that was seen or observed** – including actual injuries, parents/carers experiencing difficulties in providing basic care or consistently negative behaviour towards a child or adult at risk
 - 2. Any allegations or disclosures** made by a child or adult at risk, carers or anyone else; if possible it is best practice to write down the actual words used to describe the abuse/harm
 - 3. Any explanations given** for injuries or statements made by the child or adult at risk or others
 - 4. All action taken** such as discussion with the Designated Safeguarding Officer, Adult Safeguarding Champion, contact with Statutory Social Services, relevant agencies, third party organisations etc.
- Where a child or adult is at risk and circumstances are a cause of longer-term concern, staff or volunteers must ensure that this is monitored and reported to the Designated Safeguarding Officer or Adult Safeguarding Champion
- DSO/ASC have a responsibility to ensure that adequate recording is maintained, and that staff are aware of their responsibilities in this area

- All records should be kept in a secure place. For full information of what information will be collected and how it will be secured, stored, and disposed of please refer to section 7 of Appendix 11 - the c21 Data Protection Policy.

8 REFERRAL

The decision to refer or not to refer should be made by the Designated Safeguarding Officers or Adult Safeguarding Champion as appropriate.

8.1 When considering whether to refer on to another agency (e.g. to PSNI, Social Services etc.) the following should be taken into account:

- The wishes of the child or adult at risk and their right to self-determination
- The mental capacity of the child or adult at risk
- Known indicators of abuse
- Level of risk to this individual
- The seriousness of the abuse
- The effect of the abuse on the individual
- Level of risk to others
- The effect of the abuse on others
- Whether a criminal offence has been committed
- Whether other statutory obligations have been breached
- The need for others to know
- The ability of others (e.g. PSNI, Social Services) to make a positive contribution to the situation.

8.2 Information if known, which will be required when you make a referral or report your concerns may include details relating to:

- Alleged victim – name, address, age, gender, ethnic background including principal language spoken, details of any disability
- GP and any known medication
- Whether the individual is aware of and has consented to the referral/report
- The mental capacity of the individual (are there any concerns/doubts about this?)
- Reasons for concerns and therefore this referral
- How these concerns came to light
- Specific information relating to these concerns
- Any arrangements which have already been made for the protection of the child or adult at risk or any immediate action taken
- Anyone else to whom this referral has also been made
- The alleged perpetrator and if they are a child or adult at risk
- The alleged abuse and information about suspicions

- Any other background information
- An impression on how serious the situation might be
- Any other professionals involved
- Carers information and any significant family members, neighbours, friends.

8.3 Information passed on must be relevant, necessary, and up to date.

9 ALLEGATIONS AGAINST c21 THEATRE COMPANY STAFF OR VOLUNTEERS

c21 Theatre Company's 'Disciplinary and Grievance Policy' will be enacted if any allegation of abuse to a child or adult at risk is made against a member of staff or volunteer. This can be found attached to the terms and conditions of employment or volunteer agreement. The procedure may be applied to whether the alleged abuse took place whilst at work or in the person's private life. The Artistic Director in consultation with a member of the Board of Trustees shall decide whether suspension is appropriate whilst investigations are undertaken.

Should members of staff or volunteers witness or have concerns with regards to the behavior of a colleague then they are obliged to report this to the Artistic Director or a Designated Safeguarding Officer. This information will be treated in the strictest confidence.

If an incident or concern relates to one of the Designated Safeguarding Officers, then concerns should be reported to the alternative Officer. If an incident involves both then the NSPCC, Social Services or PSNI should be contacted.

(See code of conduct in Appendix 3 for staff and volunteers with c21 Theatre Company and Appendix 10 Whistleblowing Policy)

10 GOOD PRACTICE

c21 Theatre Company have several measures in place that constitute good practice. These include recruitment, communication, training, induction, and support.

10.1 Recruitment

Recruitment and Induction of Staff:

c21 Theatre Company are committed to ensuring that the welfare of children and adults at risk is of paramount consideration and that company recruitment policies should reflect this. c21 Theatre Company is committed to equality and fair treatment of all staff, volunteers and potential candidates for posts within the company. Open auditions

take place for roles with the company and are advertised in multiple locations, such as social media and relevant websites, so that they have a wide reach. Candidates are asked to provide a CV and cover letter for any positions advertised. An interview process relevant to the post will take place for all candidates.

c21 Theatre Company is a registered with an umbrella body (Greater Falls Neighbourhood Partnership at Frank Gillen Centre Belfast) in order to obtain Access NI checks and requires enhanced disclosures from all staff and volunteers that have regular contact with children or adults at risk. Staff and volunteers are asked to provide written consent to participate in the Access NI process.

As part of c21 Theatre Company's recruitment and selection process, offers of employment to positions where working with children and/or adults at risk is an expected part of the job will be subject to an Access NI check. Two written references will be sought and verified. Freelance employees will attend an informal meeting to go talk through the requirements of their role with the company and the expectations on them in relation to safeguarding.

10.2 Communication

c21 Theatre Company is committed to promoting good practice and generating a culture of 'openness' within its own work and in a wider context:

- Children and adults at risk need to be aware of this policy and of their right to be protected from abuse
- Staff and volunteers should talk to children and adults at risk about their contact with staff or others and encourage them to raise any concerns
- All parties are to be informed how they can communicate their safeguarding concerns. A Safeguarding Policy Statement will be displayed clearly on the c21 website along with the contact details for the Designated Safeguarding Officers so that staff, volunteers and beneficiaries can fully understand the policy and procedures. Hard copies are available by request
- Staff should plan and organize work and the workplace so as to minimize risks as far as possible. They must ensure that a sense of accountability exists between staff and volunteers so that poor practice or potentially abusive behaviour does not go unchallenged.

10.3 Training and induction:

- All staff will receive Safeguarding training so they understand why it is necessary to protect children and adults at risk - Could this be a PowerPoint or video presentation that we share with staff or volunteers outlining our policy and procedures

- Mandatory refresher training will be provided for existing staff every 3 years

10.4 Digital Technology

Technology safeguarding or otherwise known as digital safeguarding, online safeguarding, eSafeguarding, Internet safety, and eSafety applies to how both the c21 staff, volunteers and children/young people work, use and communicate on technological devices, now and in the future, both safely and responsibly.

Today's technological devices and resources include an ever-growing list of devices as technology advances:

- The Internet
- Computers and laptops
- Mobile phones,
- Digital watches
- Tablet devices
- Storage devices including hard drives and pen drives
- Interactive speakers
- Smart TV's
- E readers such as a kindle

This is not an exhaustive list but are the main devices utilised.

Further to this the ever-growing list of apps and communications tools must also be included and considered when we think of 'safeguarding' as each has its individual pros and cons.

If there are queries or need for guidance in new technologies, please liaise with the Designated Safeguarding Officer or Adult Safeguarding Champion.

The improper use of these devices or communication tools can be defined as a 'safeguarding issue'.

All technology-based safeguarding must be treated as if the incident happened 'in-person' and reported to a DSO/ASC.

Safeguarding issues include indecent images of children or adults, grooming or inappropriate communications through the internet, the use of devices for publicising or performing sexual acts, welfare issues such as the mistreatment of a person and/or animals. Again this list is not exhaustive and any concerns should be relayed to a DSO/ASC.

It is important to note that technological advances and the use of technology methods utilised by perpetrators consistently evolves and all practitioners should seek to be aware of any updates in the usage of devices and current apps being utilised by children/young people.

10.5 Social Media

When using social media whether on behalf of the organisation or using social media outside of work (including personal accounts) you should adhere to the following rules:

- Do not post or forward a link to any abusive, discriminatory, harassing, derogatory, defamatory or inappropriate content.
- Do not use social media sites to bully or intimidate a member of staff
- Do not use social media in any way that is unlawful
- Do not give or accept a 'friend or follow request' from/to a child, young person, or vulnerable adult on social media
- Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the Creative Director.
- Do not post material in breach of copyright or other intellectual property rights.
- You are personally responsible for content you publish – be aware that it will be public for many years.
- You should avoid social media communications that might be misconstrued in a way that could damage c21's reputation, even indirectly.
- Do not post anything that would bring the organisation of c21 into disrepute
- If you have disclosed your affiliation as an employee of our organisation you must ensure that your profile and any content you post are consistent with the professional image you present to service users and colleagues.
- Do not publish your work email address on a personal social networking site or use this address as part of your login/registration on a personal site.

10.6 Risk Assessment

An appropriate degree of risk assessment should take place before any activity takes place with children and young people, and/or adults at risk. This should include a venue risk assessment, a risk assessment of any equipment being used, and/or an activity assessment, as relevant. For an example of a risk assessment template please see Appendix 12 of this policy.

11 POLICY REVIEW

This policy will be reviewed every three years or more regularly if appropriate.

**Appendix 1 – Designated Safeguarding Officer and Adult Safeguarding Champion
Contact Details**

Designated Safeguarding Officer

Trustee

Dearbhla Holohan, derviedotes@gmail.com, 07753 250193

Adult Safeguarding Champion

Artistic Director

Stephen Kelly, c21theatre@gmail.com, 07752 089400

Appendix 2 – Useful Numbers

If someone is in immediate danger contact the PSNI on 999

Children and Young People

If it isn't an emergency situation you can contact NSPCC Freephone helpline Monday to Friday 8 am – 10 pm or 9 am – 6 pm at the weekends - 0800 3891 701

- PSNI Non-Emergency Line, 101
- Gateway Social Services Team, 028 9050 7000
- Regional Emergency Social Work Service (Out of Hours), 028 9504 9999

Your local area health Trust gateway service:

- Belfast HSC Trust - 028 9050 7000
- Northern HSC Trust - 0300 1234 333
- South Eastern HSC Trust - 0300 1000 300
- Southern HSC Trust - 0800 7837 745
- Western HSC Trust - 028 7131 4090

Adults

Trust Adult Safeguarding Specialist Contact details

- Northern Trust 028 256 35512
- Western Trust 028 716 11366
- South Eastern Trust 028 925 01227
- Belfast Trust 028 950 41744
- Southern Trust 028 374 12015 or 028 374 12354

Regulation and Quality Improvement Authority (RQIA) - 028 9536 1111

Appendix 3 – c21 Code of Conduct

This Code of Conduct is intended to promote best practice when working in partnership with a host organization across all forms of drama engagement. Any breach of the Code of Conduct will result in disciplinary procedures.

DO:

- Show respect, be patient and listen
- Set a good example by using appropriate language, attitude and demeanour at all times
- Avoid any behaviour that is bullying or harassing to someone else:
 - Bullying and harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010.
 - Examples of bullying or harassing behaviour include:
 - spreading malicious rumours
 - unfair treatment
 - picking on or regularly undermining someone
 - denying someone's training or promotion opportunities
- Wear c21 Theatre Company branded clothing
- Conduct activities within sight or hearing of others
- Use social media responsibly and be aware at all times that your behaviour can potentially affect the reputation and standing of c21
- Work in partnership with the host group staff as they will have a longer and more complex relationship with participants
- Stop or cancel activities if conditions are unsafe or unreasonable demands are being made
- Work out or consult with c21 Theatre Company in advance to agree appropriate discussion topics and exit strategies if an activity has a particularly sensitive or emotional content. c21 Theatre Company will always provide host groups with resources and guidance for pre-work and follow-up
- Keep physical contact to an appropriate level. What that level is in relation to a

specific activity should be discussed with the company beforehand and then with the lead contact person in the host organisation. Be prepared to adjust the activity to allow for changing circumstances

- Avoid excessive physical contact with children and refrain from activities such as wrestling or tickling. Ask the child if a particular physical activity is okay
- Identify a lead contact in each host group and the lead contact person from c21 Theatre Company, in most cases the Company Stage Manager. Make sure everyone including the children knows who they are
- Be aware of child safety when arriving at the venue. Be prepared to have other employees walking in front of, behind or beside the vehicle, particularly if the vehicle must cross a playground. Keep vehicles locked at all times
- Stay in prescribed areas and avoid wandering around the facilities
- Use staff not children's toilets and always ask for a private changing area. If neither is available, establish a system with the host group to make them 'out of bounds' while c21 Theatre Company is using them
- Be as careful leaving as arriving
- Secure equipment of any kind that could be a potential risk to you or others (scissors, staple guns, penknives, etc) must be kept away from children and used by them only under supervision

Never:

- Work or perform without supervisory staff/volunteers present. The host organisation is responsible for supervising children and no c21 Theatre Company employees – individually or together – should be left alone with children for any length of time.
- Hit or physically assault or abuse children
- Show favouritism towards a child
- Comment on personal appearance or dress
- Promise to keep secrets
- Belittle or demean children

- Embarrass, ignore or single out a child
- Add a child or young person to any of your social media networks
- Allow or engage in inappropriate touching
- Engage in sexually provocative games
- Allow children to engage in abusive peer activities, e.g. bullying, mocking or initiation ceremonies
- Offer lifts to children or permit them to travel in the company vehicle
- Arrange meetings with children outside organised activities without the prior consent of parents and c21 Theatre Company
- Bring any alcohol into a host organisation, even for consumption during non- working hours
- Turn up for work smelling of alcohol
- Smoke inside school grounds, or in the presence of children or young people
- Bring any type of prescription drugs into a host organisation, unless medically necessary. If necessary (e.g. inhaler, epi –pen) ensure they are kept on your person at all times, or with the host organisation
- Bring items of value should be left at home or given to the Company Stage Manager or host group during activities. Mobiles must be switched off during all activities
- Swearing and having conversations of an adult nature should be avoided while in the host organisation. Many schools and groups have ‘no swearing’ policies which c21 Theatre Company must respect
- Never undermine, ridicule or insult the staff or volunteers of a host group
- Offer alcohol, cigarettes or drugs (even headache tablets) to a child

Appendix 4 – Safeguarding Incident Report

Safeguarding Children & Adults at risk – Incident Report & Disclosure Form

Date:

Time:

Name of Child/Adult at Risk:

Social worker/Probation Officer (if applicable)

Relationship with c21 Theatre Co:

Recorded by:

Location of disclosure/incident:

Details of concern:

Action taken:

Action to be taken (within 7 days)

Checklist (attached) completed:

Signed:

Signed (DSO/ASC):

Checklist

1. Informed social services immediately
2. Completed incident report/disclosure form
3. Informed a Designated Safeguarding Officer/Adult Safeguarding Champion
4. Informed the child or adult at risk of the process and referred to the Safeguarding Children and Adults at Risk Policy
5. Involved and informed child or adult at risk of decision and action to be taken as far as possible
6. Informed carer (if appropriate)
7. Followed up verbal information in writing within 24 hours
8. Sent copies of recordings to relevant parties:
 1. Child or adult at risk's social worker (if applicable)
 2. Social services duty office
 3. Designated Safeguarding officer
 4. Child or Adult at risk's file
9. Any other action

Appendix 5 – Guidelines on the use of photography

It can be really useful to take photos or videos at c21 events. We can use these images to publicise the company and feedback to funders. However, you should make sure the people you are photographing know they are being photographed and understand how the images will be used. Remember that people might have their own reasons for not wanting themselves or their children to be photographed, and it is important to respect this.

How will you use the images, and why do you need them?

Images in which people can be identified are a form of personal data as referenced in Appendix 11 – the c21 Data Protection Policy. Information about how these images will be stored and disposed of is contained in this policy.

Tell people you are taking photos

Before taking any photos or films, you should ensure the people they are aware that they are being photographed, who is taking the pictures, what they will be used for, and who they will be shared with. You should also tell people who they should contact if they do not want to be photographed, or if they want their images deleted later. Display clear signs at your event which specifically explain all this.

Sharing images with members of your group

Sometimes, when you take pictures at an event, people ask to be given copies. It is fine to share photos so long as everyone knows this will happen. You should make it clear on your signs

When you share photos with people, you need to make sure they understand that they are for their personal use only, and should not be shared more widely (e.g. should not be put on Facebook).

Sharing photos with third party organisations

You may wish to share photos with other organisations, such as your funders, supporters or suppliers. Make sure people know if this will happen. You should tell people who the images will be shared with, and for what purpose. Before sharing photos with a third party organisation, make sure the organisation understands what they can use them for. The photos should only be used for the purposes you have told people about. You should also check that the photos will be stored securely, not kept for longer than needed, and that the organisation will delete the photos in future if you ask them to. Keep track of which photos you have shared, because if someone asks you to delete their picture you will need to pass this message on to any third party organisation you shared it with.

Photos and films of children

Before photographing or filming children (aged under 13), you need to make sure that their parent/guardian is aware of why you are taking pictures, what they will be used for, and how to contact you to ask for them to be deleted. Parents/guardians should have an opportunity to tell you if they do not want their children to be photographed.

At one-off events, the person taking photos should check with an accompanying adult before taking photos of children. If a child's legal guardian is not present, you should not photograph their child. Where possible you should seek to get consent in writing, using a simple consent form.

Appendix 6 - Induction Register

Name:

Date:

I can confirm that I have been given induction training on c21 Theatre Company's Safeguarding Children and Adults at Risk policy.

This covered in detail the following areas:

- Code of Conduct
- Recognising Abuse
- Reporting Abuse
- Guidelines on the use of Photography

I have been given copies of:

- c21 Theatre Company's Safeguarding Children and Adults at Risk Policy
- Designated Officer contact details
- Code of Conduct
- Safeguarding Incident Report
- c21 Theatre Company's Complaints Procedure

I understand that any breach of policy or code of conduct will result in disciplinary action.

Signed:

Dated:

Appendix 7 – c21 Training Register

Training Register

Name	Disclosure check	Induction training	Refresher training	Refresher training

Appendix 8

Documentation Clearance Form

Many of the activities organised by c21 Theatre Company are recorded on film, still photography and sound devices for archive and promotional purposes. Equally young audience/participants create artefacts, drawings, collages etc. in our associated workshop activities.

This form asks parents/guardians permission to record and use these (images, sound, artefacts) for c21 Theatre Company Productions archival and general promotions only.

Also, on occasion local press and broadcast media record c21 Theatre Company events. Importantly, c21 Theatre Company **will not publish any address details or surnames of any young people** in captions associated with any film, still photography, sound or artefacts.

Participation in any filming is always optional. If you choose to withhold your permission your **child will not be excluded or penalised, unless the entire activity is being recorded.**

Parents/Guardians who wish to give permission for their children to be included/recorded in such activities **please sign below**

Name of young person _____

Name and date of Activity _____

Signature of Parents/Guardian _____

Date: _____

Parents/Guardians who do not wish their children to be included in such activities, are asked to contact c21 Theatre Company in writing, stating the name of the child and the



arts activity they are involved in. Please send these details to **c21 Theatre Company, 15 Hollybrook Crescent, Newtownabbey, BT36 4ZW**, or by email to c21theatre@gmail.com

If you have any queries regarding the above, please do not hesitate to contact the Company on 028 90 843584 Thank you for your co-operation with this matter.

Stephen Kelly

Artistic Director Tel: 028 90843584 / 07752089400

APPENDIX 9

INFORMATION ON SAFEGUARDING FOR HOST GROUPS-SCHOOLS, YOUTH CLUBS & VENUES

c21 Theatre Company is a professional theatre company dedicated to provision of art for children and young people. It operates a Safeguarding Policy committing it to making sure children are protected and kept safe from harm while they are with the company. c21 Theatre Company is also committed to ensuring that the rights of children are respected and understood by its employees, including freelance artists, and volunteers.

As an organisation interested in or booked to host a c21 Theatre Company activity, the following outlines some additional information that relates specifically to Child Protection over and above practical arrangements for our visit.

What we expect from you

c21 Theatre Company expects that most organisations will have a formal Child Protection Policy and Procedures. If you do not, we would encourage you to seek advice about developing a policy. c21 Theatre Company's policy is available from the company's office or on the website www.c21theatrecompany.com.

In the Questionnaire sent when you book a c21 Theatre Company project, we will ask for a named contact and Child Protection Officer. These might not be the same people but we would ask you to consider the time of day or the date we will visit you (i.e. at least one of these people should be there when we are).

We will also ask about the number of children/young people and the number of adults who will be there. It is your responsibility to provide adequate supervision for your group for the full duration of the activity. Under no circumstances should a c21 Theatre Company employee be left alone with the children at any time.

If we feel what we will be doing will provoke emotional or difficult responses, we will provide you with pre-or post- activity resources. We expect you to do any pre-work we ask if you have received it in time.

If we are unhappy at the level of supervision, inadequate facilities or if we feel our staff are being mistreated or abused, c21 Theatre Company will reserve the right to halt or cancel an activity.

What you can expect of us

You can be assured that anyone from c21 Theatre Company who visits your organisation

has committed themselves to c21 Theatre Company's Safeguarding Policy and undertaken induction. They will be trained professionals who understand how to work with young people and they will show you and your children the respect you deserve. They will also have received induction in recognising signs of abuse, reporting allegations and concerns and receiving disclosures. They will have also undergone an Enhanced Disclosure check by Access NI.

If there is an emotionally sensitive content to the work we are doing with you (either in workshop or performance) we will provide you with appropriate resource materials, if necessary in advance to enable group preparation.

If you have any concerns about the appropriateness of an activity, we will be open to your comments and will examine whether or not a particular aspect of our work should be adjusted accordingly. For some of our projects, we will carry out a preliminary phone check with you about your group.

If at any point you have a concern about the behaviour of one of our employees, contact **c21 Theatre Company's Artistic Director Stephen Kelly** on **07752089400/028 90 843584**. If he is not immediately available, please explain that it is an urgent call. A message will be passed to them and your call will be returned as soon as possible and within 24 hours.

Appendix 10

WHISTLEBLOWING POLICY

1. Introduction

c21 Theatre Company is committed to ensuring that it, and the people working for it, complies with the highest standards of openness, honesty, integrity, and accountability.

Whistleblowing

A whistleblowing concern is about a risk, malpractice or wrongdoing that affects others. It could be something that adversely affects young people, workers, the organisation itself or the public.

The following list illustrates the types of issues that may be raised

- Concerns of financial malpractice
- Failure to comply with a legal obligation
- Health and safety risks, risks to the public as well as to other staff members
- Damage to the environment
- The unauthorised use of public funds
- Fraud or corruption
- Breach of internal policies and procedures
- Inappropriate conduct or unethical behaviour
- Unauthorised disclosure of information
- Any attempts to prevent disclosure of any of the above

A whistle blower is a person who raises a genuine concern relating to any of the above.

Grievance

A grievance is a personal complaint about someone's own employment situation e.g. terms of employment, pay or unfair treatment.

Generally, a whistle blower has no self interest in an issue being raised; however the distinction may not be clear cut. If in doubt members of staff and other individuals are encouraged to raise the concern in any case.

Public Interest Disclosure (NI) Order 1998

The Public Interest Disclosure (NI) Order 1998 gives workers the right of complaint to an industrial tribunal, if in good faith, they report wrong doing, and as a result suffer any detriment.

2. Aims

The aims of this policy are:

- To encourage staff and other individuals who have a concern about actual, potential, or suspected malpractice or wrongdoing to raise that concern openly and at an early stage so that it can be dealt with appropriately and in a timely manner
- Reassure staff and others that it is safe and acceptable to speak up if they have a concern about an actual or potential malpractice or wrongdoing and that any information about wrongdoing is valued
- Confirm c21's commitment to taking the necessary action properly and promptly, to address any genuine concern
- Provide staff with guidance on how to raise these concerns

3. Safeguards

This policy is designed to offer protection to those members of staff and other individuals who disclose such concerns provided the disclosure is made:

- In good faith and
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice

The individual will also be protected if they make a disclosure to an appropriate person or body see (External Disclosure Point 8). It is important to note that no protection from internal disciplinary procedures is offered to those who chose not to use these procedures.

4. Confidentiality

c21 will treat all such disclosure in a confidential and sensitive manner.

The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

5. Anonymous disclosures

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of c21.

In exercising this discretion, the factors considered will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation is from attributable sources

6. Untrue allegations

If an individual makes an allegation in good faith which is not confirmed by

subsequent investigation, no action will be taken against that individual. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persist in making them, disciplinary action may be taken against the individual concerned.

7. Procedure for making a disclosure:

A (Initial Step)

Normally the individual should make their disclosure to the Creative Director in the first instance. If the disclosure concerns the Creative Director or any area under their control the disclosure should be made to the Chair of the Board.

B (Process)

The person to whom the disclosure is made will normally consider the information received to determine if there is a prima facie case to be answered.

If the person to whom the disclosure is made deems that there is no prima facie case to answer this decision must be fully explained to the individual raising the concern. It will be open to the individual if they so wish to raise the disclosure with another person.

If the matter disclosed is deemed to relate to suspected financial malpractice the matter should be dealt with in terms of the Anti-Fraud policy.

Where it is deemed that there is a prima facie case to answer then the person to whom the matter has been disclosed could either decide to deal with the matter or convene a panel with another senior manager with no interest in the matter covered by the disclosure.

The panel will consider the information made available to it and decide if the matter should be investigated and if it is agreed to investigate what form the investigation will take.

This may be:

- To investigate the matter internally
- Refer to the police
- Refer the matter to another more appropriate procedure

Where the matter is to be investigated internally the panel will determine:

- Who should undertake the investigation
- The procedure to be followed
- The scope of the concluding report

Where the panel determines not to investigate the matter this decision must be fully explained to the person who raised the concern.

C Investigation

Any investigation will be conducted as sensitively and speedily as possible. The investigation should not be carried out by an individual who has the power to make a decision

on the matter if possible

The person making the disclosure will be informed of the investigation and given an indicative timetable.

The person against whom the disclosure has been made will be informed at an early stage of the nature of the disclosure and the evidence supporting it and be allowed to respond.

As a result of the investigation other procedures may be invoked

- Disciplinary
- Grievance or complaints
- Dignity at Work

Or it might form the basis of a special investigation

In some instances, it may be necessary to refer the matter to an external authority to investigate the matter further.

D. Feedback

The panel will be informed of the outcome of the investigation and decide what action, if any is to be taken.

The person to whom the disclosure was made will inform the individual who made the disclosure what action if any is to be taken

The person(s) against whom the disclosure is made will be informed of the outcome of the investigation and if any further procedures are to be revoked as a result

8. External Disclosure

If a member of c21 remains unsatisfied after exhausting the internal procedures within c21 and continues to reasonably believe that the information and allegations disclosed are substantially true then he/she is entitled to take the matter to:

- Legal adviser
- Health and Safety Executive
- Information Commissioner
- PSNI
- Charity Commission

Any member of staff who makes such a referral is to be protected from adverse treatment including bullying, harassment and victimisation.

9. Media

A member of staff should under no circumstances approach the media with details of suspected wrongdoing. If the member of staff approaches the media where the

concern is disclosed in a malicious manner or for personal gain, this may make the disclosure unreasonable and the protection given to you by this procedure may be lost. Additionally, c21 may consider this to be gross misconduct and disciplinary action may be taken.

Appendix 11 – DATA PROTECTION POLICY

DATA PROTECTION POLICY

1. Introduction

c21 Theatre Company is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR) and Data Protection Act 2018. c21 processes personal data including employees, clients, participants, suppliers, business contacts, and other people c21 has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet c21 data protection standards — and to comply with the law.

2. Company Contact Details

Any questions on data protection, disclosure or breach should be directed to: Stephen Kelly at 07752089400 or at c21theatre@gmail.com

3. Aim of the policy

The aim of this policy is to ensure that all stakeholders are aware of their responsibility to comply with the principles and legal conditions provided by the data protection legislation, including the General Data Protection Regulation (GDPR) and Data Protection Act 2018. Failure to meet those responsibilities are likely to lead to serious consequences. A serious breach of data protection is likely to be a disciplinary offence and will be dealt with under c21 disciplinary procedure. If you access personal data or personal sensitive data without authority, this will constitute a gross misconduct offence and could lead to your summary dismissal / termination of contract for services. As a stakeholder in c21 if you knowingly or recklessly disclose personal data in breach of the data protection legislation, you may be held personally criminally accountable for any such breach. C21 will ensure that personal data that we hold adheres to the General Data Protection Regulation and Data Protection Act 2018.

4. Responsibilities

The legal responsibility for compliance with the Regulation and the Act lies with c21 Theatre Company who is the 'data controller' under the General Data Protection Regulation and Data Protection Act 2018. The ultimate responsibility for c21's compliance lies with the Creative Director. However, compliance with this policy and the

data protection legislation is the responsibility of everyone within c21 who processes personal information.

5. Responsibilities of Individuals and staff

Information about yourself

All individuals are responsible for:

- Checking that any information provided to c21 in connection with their employment/service agreement is accurate and up to date
- Informing c21 of any changes to information that they have provided e.g. change of address
- Informing c21 of any errors or changes. c21 cannot be held responsible for any errors unless the individual/staff member has informed us of them

6. Definitions

6.1 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

6.2 'special categories of personal data' Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

6.3 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

6.4 'pseudonymisation' means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately

and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

6.5 ‘Data Subject’ means the identified or identifiable living individual to whom personal data relates.

6.6 ‘Data Controller’ the person or organisation that determines the means and the purpose of processing data.

6.7 ‘Data processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

6.8 ‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

7. Data Protection Principles and Compliance

Basic Principles for data processing	Company Practice
<p>Personal data shall be:</p> <p>1. processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);</p> <p>2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be incompatible with the initial purposes (‘purpose limitation’);</p>	<p>Privacy notices</p> <p>All personal data must be processed in a lawful, fair and transparent way. To ensure that data subjects are aware of how their data will be processed c21 will issue them with a privacy notice. Privacy notices will be tailored to the stakeholders of the business: Service Users, employees, Partners, Board of Directors, website, and general public, etc. This notice will give information on how c21 collects and processes the personal data, explain how, when and for how long c21 proposes to process the data subject personal information. The notice will include information around the data subjects’ rights and most importantly, the notice should also explain how we will keep the information secure and protected against unauthorised use.</p>

	In all circumstances you must check that you are using an up-to-date version of the c21's privacy notice and it is being used in accordance with c21's guidelines.
3. adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');	Data minimisation c21 shall ensure that personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. c21 will comply with its data retention schedules
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay	Accuracy c21 shall take reasonable steps to ensure personal data is accurate. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date. If Basic Principles for data processing Company Practice('accuracy'); an employee/service user/individual personal details changes, for example change of address, change to surname etc you must inform Stephen Kelly at 07752089400 or at c21theatre@gmail.com as soon as practicable so that c21 records can be updated. C21 will not be responsible for any inaccurate data held on its systems where the employee /individual has failed to notify c21 of the relevant change in circumstances.
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to	Retention and managing records c21 has data retention schedule for all personal data held to ensure that data will not be kept for longer than is necessary. Different categories of personal data will be retained for different periods of time, depending on legal, operational and financial requirements. Any data which c21 decides it does not need to hold for a particular period of time will be destroyed in accordance with its retention of data policy.

<p>implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');</p>	<p>The retention of data policy will detail staff roles and responsibilities in relation to this.</p> <p>Archiving / removal</p> <p>To ensure that personal data is kept for no longer than necessary, c21 shall put include details regarding archiving and removal of data in the retention of data policy</p>
<p>6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').</p>	<p>Security</p> <p>c21 shall ensure that personal data is stored securely using modern software that is kept-up-to-date.</p> <p>Access Rights</p> <ul style="list-style-type: none"> • Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. This procedure should be adhered to, not overridden or ignored. • Staff must ensure that they do not access another employee's records without authority as this will be treated as gross misconduct and it is also a criminal offence <p>Storage</p> <ul style="list-style-type: none"> • Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access. • Confidential paper records will not be left unattended or in clear view anywhere with general access. • Where data is saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use. <p>Encryption</p> <ul style="list-style-type: none"> • Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up off-site.

	<ul style="list-style-type: none">• Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted.• All electronic devices are password protected and encrypted to protect the information on the device in case of theft.• Any confidential data containing client financial information or personal data must be sent internally or externally using password control or a line to the shared drive must be provided in an email. No documents must be sent that can be opened without any protection. <p>Passwords</p> <ul style="list-style-type: none">• All necessary members of staff/Individuals are provided with their own secure login and password, and every computer regularly prompts users to change their password.• Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. <p>Usage</p> <ul style="list-style-type: none">• Staff/individuals will not use their personal laptops or computers for company purposes.• In terms of mobile phone please (see Bring Your Own Device Policy), c21 mobile phones will be encrypted.• Personal Data and Special Category of Personal Data should be pseudonymised where possible (see IT policy)• Logged on PCs are not left unattended where data is visible on screen to unauthorised personnel <p>Email Security and Accuracy</p> <ul style="list-style-type: none">• Circular emails are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.• When sending confidential information by email, staff/individuals will always check that the recipient is correct before sending.
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	<ul style="list-style-type: none"> • All staff should ensure that their emails have the up to date company disclaimer at the bottom of all emails before sending <p>Deletion</p> <ul style="list-style-type: none"> • When personal data is deleted this should be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place. • Where possible, c21 enables electronic devices to allow the remote blocking or deletion of data in case of theft. <p>Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff/Individuals will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from c21 premises accepts full responsibility for the security of the data.</p>
7. The controller shall be responsible for and be able to demonstrate compliance with 'accountability'	Technical and Organisational Measures including practices such as DPIA and appointment of data protection representative/Stephen Kelly

8. Lawful grounds for processing

c21 may process personal information lawfully for a number of reasons, including in order to:

Personal Data	Special Category of Personal Data
<p>(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p>	<p>a) the data subject has given explicit consent</p> <p>b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law</p> <p>c) processing is necessary to protect the vital interests of the data subject</p>

<p>(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p> <p>(d) Vital interests: the processing is necessary to protect someone’s life.</p> <p>(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.</p> <p>(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)</p>	<p>d) processing is carried out in the course of its legitimate activities with appropriate safeguards</p> <p>e) processing relates to personal data which are manifestly made public by the data subject;</p> <p>f) processing is necessary for the establishment, exercise or defence of legal claims or</p> <p>g) processing is necessary for reasons of substantial public interest</p> <p>h) processing is necessary for the purposes of preventive or occupational medicine</p> <p>i) processing is necessary for reasons of public interest in the area of public health</p> <p>j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
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8.1 Consent

In certain circumstances there may be a requirement for the data subject to consent to their personal data or special category of data being processed. The consent must be freely given, and the data subject can withdraw their consent and change their mind at any time to all or any part of their processing.

8.2 Sharing personal data

c21 may share your personal information with other third parties – refer to relevant stakeholder privacy notice. We may also need to share your personal information with a regulator or to otherwise comply with the law.

8.3 Transfer to another country

Transfer of personal data to countries or organisations outside of the United Kingdom (UK) should only take place if appropriate measures are in place to protect the security of that data. We do not generally have a need to transfer data outside of the UK. However, if you are requested to transfer personal data to a country or organisation outside of the UK you must not transfer personal data to a country or organisation unless that country or organisation ensures an adequate level of protection in relation to the processing of personal data and you have in place safeguards to ensure this is done. You must speak to the Data Protection Representative who is Stephen Kelly before you send personal data outside of the UK.

9. Rights of the data subject

The data subject must be permitted to exercise their rights in relation to their personal data. Subject to certain legal limitations, data subjects have a number of legal rights regarding how their personal data is processed. At any time, a data subject can request that c21 should take any of the following actions, subject to certain legal limitations, with regard to their personal data:

- Allow access to the personal data
- Request corrections to be made to data
- Request erasure of data
- Object to the processing of data
- Request that processing restrictions be put in place
- Request a transfer of personal data
- Object to automated decision making
- Right to be notified of a data security breach

There are different rules and timeframes that apply to each of these rights. You must follow c21's policies and procedures whenever you process or receive a request in relation to any of the above rights.

10. Subject access request

Every data subject has the right to know and obtain communication in particular with regard to the purposes for which the personal data are processed, where possible the period for which the personal data are processed, the recipients of the personal data, the logic involved in any automatic personal data processing and, at least when based on profiling, the consequences of such processing. If the information requested does

not fulfil the definition of personal data, then c21 does not have to disclose it in response to a subject access request

11. Response to data subject request

- Notify c21 Data Representative immediately and comply with the subject access request policy.
- Recognising a request - A data subject request may be made verbally or in writing. It can also be made to any part of your organisation (including by social media) and does not have to be to a specific person or contact point.
- Before disclosing any personal information, you must verify the identity of the data subject. Check that the record is actually about the person concerned and not about someone else with the same name.
- Any employee could receive a valid request which needs to be responded to within the subject access request policy.
- A record of detail of the data subject requests must be made.
- If an individual makes a request electronically, we will endeavour to provide the information in a commonly used electronic format, unless the individual requests otherwise.
- You have one month from receipt of a valid request to provide the information.

12. Breach

Breach of the data protection legislation, including the GDPR rules can cause distress to the individuals affected by the breach and is likely to leave c21 at risk of serious financial consequences. The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The Creative Director will ensure that all staff members are made aware of, and understand, what constitutes as a data breach as part of their continuous development training.

13. Reporting a breach

You must follow Include Youth's Data Breach Policy which includes immediately informing the Data Representative so that steps can be taken to:

- Contain the breach;
- Assess the potential adverse consequences for individuals, based on how serious or substantial these are, and how likely they are to happen; and
- To limit the scope of the breach by taking steps to mitigate the effects of the breach.

The Data Representative will determine within 72 hours the seriousness of the breach and if the Information Commissioner's Office (ICO) and/or data subjects need to be notified of the breach. Failure to report a breach when required to do so will result in an organisational fine, as well as a fine for the breach itself.

14. Record keeping

As data controller c21 shall record through a data inventory its processing activities including but not limited to: the categories of processing, details of transfers of personal data to a third country or an international organisation and where possible, a general description of the technical and organisational security measures.

15. Training

Training will be provided to all individuals including employees, management board, etc on how they must handle personal information of individuals and have a basic understanding of the data protection legislation, including the GDPR. C21 will provide you with continuous training and updates on how to process personal data in a secure and confidential manner. This training will be mandatory, and it is your responsibility to keep yourself informed and aware of any changes made to privacy notices, consent procedures and any other policies and procedures associated with our internal processing of personal data.

16. Data protection impact assessment

Where a type of processing is likely to result in a high risk to the rights and freedoms of individuals, the controller, c21 must, prior to the processing, carry out a data protection impact assessment. A data protection impact assessment is an assessment of the impact of the envisaged processing operations on the protection of personal data.

A data protection impact assessment must include the following:

- (a) a general description of the envisaged processing operations;
- (b) an assessment of the risks to the rights and freedoms of data subjects;
- (c) the measures envisaged to address those risks;
- (d) safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate compliance with this Part, taking into account the rights and legitimate interests of the data subjects and other persons concerned.

In deciding whether a type of processing is likely to result in a high risk to the rights and freedoms of individuals, the controller must take into account the nature, scope, context and purposes of the processing.

17. Direct marketing

c21 will comply to practical guidance in relation to the carrying out of direct marketing in accordance with the requirements of the data protection legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (S.I. 2003/2426), General Data Protection Regulation, Data Protection Act 2018 and promote good practice in direct marketing.

18. Compliance

All those working for or on behalf of c21 are required to comply with this policy. Any alleged breach of this policy may result in an investigation which may result in action being taken by c21 up to and including dismissal: or termination of a contract or contract for services. c21 will cooperate with law enforcement authorities if a criminal violation is suspected.

19. Complaints

If you have any queries, concerns, or complaints please in the first instance contact our Data Representative Stephen Kelly at 07752089400 or at c21theatre@gmail.com

By signing this policy, I confirm that I have read and understood the content of this policy and that I agree to adhere to the content and that I understand that breach of any aspect of this policy may lead to serious disciplinary action.

Signature _____

Position _____

Date _____

Appendix 12 – Risk Assessment Template (with example)

Risk assessment for:

Conducted by:

Date:

Hazard	What could happen?	Who could be hurt?	Action taken to minimise risk

Venue Risk Assessment

Hazard	What could happen?	Who could be hurt?	Action taken to minimise risk
Varnished floor	Could be slippery when wet. Somebody could fall over and injure themselves. This could lead to bruises / broken bones / sprains / head injuries / back injuries.	Staff, volunteers, centre users.	Put out a sign warning people when the floor has just been cleaned or something has been spilled. Where possible, clean the floor at the end of the day when there are fewer people around.
Chairs and tables	These can cause clutter and people could trip over or bump into them. They could also fall onto people if they are stacked incorrectly.	Staff, volunteers, centre users.	Clear tables and chairs away before running physical activities such as sports. Ensure all centre user group leaders know how to stack tables and chairs correctly. Put up signs explaining how to stack them correctly.
Electrical appliances	Faulty appliances can cause electrocution, which can cause serious injury and death.	Staff, volunteers, centre users.	Ensure all appliances are checked regularly (at least once a year) by a competent person. Instruct all centre user group leaders, staff and volunteers to check for exposed wires and burn marks on cables or plugs before using appliances.
Outdoor steps and ramps	These are hard, and people could be injured if they trip and fall on them.	Staff, volunteers, centre users.	Have outdoor lighting which is on at all times when the centre is used after dark. Ensure all staff, volunteers and centre user group leaders know that they must keep steps and ramps clear of obstacles at all times.
Hazardous chemicals in cleaning products	Cleaning products contain chemicals that can be harmful if they come into contact with skin or are inhaled.	Staff, volunteers.	All staff and volunteers will be provided with rubber gloves for cleaning. They will also be asked to ensure that the area is well ventilated.
Fire	People could become trapped during a fire, which can be fatal.	Staff, volunteers, centre users.	Smoke alarms are installed in every room. There is a fire alarm alert button by the front entrance and in the hall. Batteries

			must be replaced as soon as they run out. Smoke alarms must be tested every six months by the caretaker, by pressing the test button on the alarm. All fire exits must be clearly labelled and kept clear and unlocked at all times when the centre is in use. There will be an annual fire drill.
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