

CiRCOMEDIA

SAFEGUARDING, CHILD PROTECTION AND ADULTS AT RISK POLICY

This is a core policy that forms part of the induction for all staff, volunteers, and Trustees. It is a requirement that everyone has access to this policy and sign to say they have read and understood its contents.

Key Information

Designated Safeguarding Lead	Zannah Chisholm, CEO
Designated Safeguarding Officers	Jono Ayres, Classes Manager Rhiannon Lloyd, BTEC Course Leader and Student Support Manager

The Trustee responsible for Safe
guarding and Designated Safeguarding
Officers Laura Tanner

Owner:	Circomedia
Author:	Operations and Academic Teams
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Changes to document:	<ul style="list-style-type: none">• Updated title to Safeguarding, Child Protection and Adults at Risk and added new logo• Added the process flowchart• Updated link to Keeping Children Safe in Education 2024• Updated link to Working Together to Safeguarding Children 2023: Statutory Guidance• Added new Appendices: Safeguarding and Reporting Concerns Essential Guidance for Staff and Flow Chart• Changing Rhiannon Lloyd's job title to BTEC Course and Student Support Manager• New Circomedia logo added and all text changes into house style• October 2025 – formatting

This policy will be reviewed and ratified at least annually and/or following any updates to national and local guidance.

Contents

1. Background.....	Error! Bookmark not defined.
2. Definitions	3
3. Scope	4
4. Intent.....	4
5. Confidentiality and Sharing Information.....	4
6. Roles and Responsibilities	5
6.1 Designated Senior Staff Member for Child Protection	5
6.2 Designated Staff Members for Safeguarding (Safeguarding Officers).....	6
7. Procedures	7
8. Monitoring and Review.....	7
9. Staff Safeguarding	7
10. Linked Policies	8
11. Appendices	8
Appendix 1.....	9
Appendix 2 Safeguarding Resources	11
Appendix 3 Flow Chart Showing Safeguarding Procedure	12

1. On Safeguarding & Promoting

Annually the Department for Education and Skills statutory guidance “Keeping Children Safe in Education” document will replace the previous year’s version. This document focuses on the safeguarding and promoting the welfare of children under the provisions of the Children Act 1989 and 2004 and following publication of Section 175 of The Education Act 2002 and 2011. https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Section 175 places a duty of care on Local Education Authorities, and on governing bodies of schools and further education institutions to make arrangements for carrying out their functions with a view to safeguarding and promoting the welfare of children.

In accordance with the Counterterrorism and Security Act 2015, there is a statutory duty on colleges to “have due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent duty. To fulfil this duty Circomedia liaises closely with City of Bristol College and Bath Spa University, who in turn liaise with the local area prevent lead to receive updates regarding local concerns and to refer students of concern to the Channel process. To further safeguard our students regarding the threats of terrorism Circomedia has also implemented a procedure in the case of critical incidents based on the Run Hide Tell guidance 2015. [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/prevent-duty-guidance-england-and-wales-2023)

Safeguarding and promoting the welfare of children covers more than child protection. This policy and the associated procedures cover arrangements for meeting the needs of vulnerable adults of providing a safe and secure environment in which to study. Circomedia and its staff form part the wider safeguarding system for children. This system is described in the statutory guidance *Working Together to Safeguard Children: [Working together to safeguard children 2023: statutory guidance](https://www.gov.uk/government/guidance/working-together-to-safeguard-children-2023)*

2. Definitions

- **Children and young people** - those aged under 18 years.
- **Abuse** – can be one or more of the following: Physical, domestic, sexual, psychological, emotional, financial or material, modern slavery, discrimination, organisational or institutional, neglect or acts of admission or self-neglect.
- **Vulnerable adults** – anyone aged 18 years of above who is or may need community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.
- **Keeping Bristol Safe Partnership** – local area safeguarding board which has replaced separate local boards for young people and adults
<https://bristolsafeguarding.org/>
- **LADO** – The Local Authority Designated Officer (LADO) is responsible for overseeing concerns, allegations, or incidents involving individuals working with children and young people.
- **Safeguarding and promoting the wellbeing of children** – this is defined in KCSIE and used in this policy as:
 - protecting children from maltreatment.
 - preventing the impairment of children’s mental and physical health or development.
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.

(Keeping Children Safe in Education, 2023)

Care of / or safeguarding vulnerable adults

This is defined for the purposes of this policy as:

- protecting the rights of adults to live in safety, free from **abuse and neglect**.
- people and organisations working together to prevent and stop both the risks and experience of **abuse or neglect**.
- people and organisations making sure that the adult’s wellbeing is promoted, including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action; and
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being. *(Care Act, 2014)*

Child Protection – this is defined as protecting a child from **abuse or neglect** and it is part of safeguarding and promoting wellbeing. This refers to the activity that is undertaken to protect children who are suffering, or are at risk of suffering, significant harm, including from child-on-child actions.

In the UK, the terms **Child or Children** as written in this policy refers to all persons under the age of 18. At the age of 16 a young person is allowed to leave home consent to lawful sexual intercourse, get married or get a full-time job, however safeguarding and child protection extends to the age of 18 years. In the case of Care Leavers, it extends to the age of 21 years.

3. Scope

- 3.1 **This Safeguarding Policy applies to all Circomedia staff, students, contracted staff, and volunteers, whether they work or study at Kingswood, Portland Square, or an external venue. The policy applies to students on work experience and placement programmes and those engaged on any Circomedia-organised off site activity.**
- 3.2 The policy applies to working partnerships supporting the Safeguarding Policy, including with City of Bristol College and Bath Spa University, local education authorities, schools, other providers of circus-based education, support agencies and employers.
- 3.3 The policy sets out the principles and primary actions for Circomedia to ensure safeguarding and well-being across all its activities. The practice and procedures necessary to achieve these aims are set out in a separate, detailed document.

4. Intent

The intent of the Circomedia Safeguarding, Child Protection and Vulnerable Adults Policy is to ensure that:

- 4.1 **A safe environment is always provided for children and young people, students and participants.**
- 4.2 Students or participants who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken. This includes the risk of radicalisation as noted in the Prevent duty.
- 4.3 There exist safe recruitment practices in checking the suitability of staff and volunteers to work with or in proximity to children and students.
- 4.4 Staff are regularly made aware of issues relating to the welfare of students through internal training and updates from the Safeguarding Team.

5. Confidentiality and Sharing Information

- 5.1 **Once a disclosure and referral have been made, the incident should be considered confidential – unless the information indicates that the person is at risk of harm from others or to themselves. Then the information will be shared with the DSL (or Safeguarding Team) and/or other agencies and professionals who are able to take protective action.**
- 5.2 All information regarding child protection issues will be kept under lock and key or in a secure electronic file.
- 5.3 Circomedia is obliged to work and share information with external agencies charged with the protection of children and young people. This includes Social Services, the police, local schools, Keeping Bristol Safe Partnership etc., based on the 'need to know' principle.

- 5.4 Circomedia keeps abreast of developments and may share anonymised information with Keeping Bristol Safe Partnership and relevant groups that it convenes including the DSL Network.
- 5.5 Circomedia commits to share information with Social Services and other official support organisations to enable access to students on-site if required and appropriate.
- 5.6 Circomedia will work closely with the area Prevent team where necessary and through them refer to the Channel process.
- 5.7 Note: 'confidentiality' is often misunderstood. An over emphasis on confidentiality can leave young people or vulnerable adults in danger of harm. If something is confidential, this does not mean that it cannot be shared. GDPR should be no barrier to information sharing about a person in need, if appropriate protocol is followed. However, it is important to:
- share only what it is necessary to share to protect a young person or a vulnerable adult.
 - record what you shared, and with whom.
 - record your reasons for sharing; and
 - inform the individual making the disclosure that information they provide will be shared, why and with whom.

6. Roles and Responsibilities

6.1 Designated Senior Staff Member for Child Protection

- 6.1.1 **The Designated Safeguarding Lead (DSL) with lead responsibility for child protection and safeguarding issues is Zannah Chisholm, CEO.**
- 6.1.2 The DSL has a key duty to take lead responsibility for raising awareness amongst staff of issues relating to the welfare of young people and vulnerable adults, and the promotion of a safe environment for the students.
- 6.1.3 The two DSOs, Rhiannon Lloyd and Jono Ayres, will act jointly as Deputy DSL. Responsibility for safeguarding and child protection, as set out above, remains with the Designated Safeguarding Lead. This responsibility cannot be delegated.
- 6.1.4 The DSL will oversee the referral of alleged harm or abuse to the relevant investigating agencies in line with "Keeping Bristol Safe" procedures.
- 6.1.5 The DSL is also responsible for:
- **Ensuring that advice and support to staff on issues relating to safeguarding and child protection, including e-safety, is provided.**
 - **Ensuring that a proper record of any child protection referral, complaint or concern is maintained (even where that concern does not lead to a referral).**
 - **Ensuring parents of young people and vulnerable adults studying and participating in activities at Circomedia are aware of the Safeguarding and Child Protection policy.**

- **Liaising as necessary with local authorities, secondary schools from which students join courses, Keeping Bristol Safe Partnership and other appropriate agencies.**
 - **Liaising with Youth Offending Teams where necessary; and**
 - **Ensuring staff receive initial safeguarding training and are aware of the organisation’s safeguarding and child protection procedures.**
- 6.1.6** The DSL/Chief Executive will prepare an annual report for the trustees setting out how this policy has been implemented and monitored.
- 6.1.7** The Board of Trustees will have a designated trustee for safeguarding who will link at least quarterly with the DSL and will also be provided with timely information on referrals, changes to the safeguarding team and any high-profile safeguarding concerns. The designated trustee will also be involved in any strategic changes to service.

6.2 Designated Staff Members for Safeguarding (Safeguarding Officers)

Circomedia will identify an appropriate number of designated safeguarding officers. These will work across both sites. Appropriate training and support will be provided to enable the designated staff to fulfil their role.

- 6.2.1** The Safeguarding Officers (designated staff members for safeguarding):
- **Report to the DSL as required and at monthly safeguarding meeting.**
 - **Know how to make an appropriate referral.**
 - **Will be available to provide advice and support to other staff on issues relating to safeguarding.**
 - **Have a responsibility to be available to listen to young people studying at Circomedia.**
 - **Will deal with individual cases as appropriate; and**
 - **Have received training in safeguarding issues and inter-agency working, as required by the “Keeping Bristol Safe Partnership” and will receive refresher training at least every two years.**
- Report to relevant organisations where required including the local safeguarding team:**
- [Report suspected abuse \(bristol.gov.uk\)](https://www.bristol.gov.uk/child-protection/safeguarding)**
[Make a referral \(bristol.gov.uk\)](https://www.bristol.gov.uk/child-protection/safeguarding)
OR
[Multi-Agency-Procedures-2023.pdf \(southglos.gov.uk\)](https://www.southglos.gov.uk/child-protection/safeguarding)
[SafeguardingSouth Gloucestershire Safeguarding \(southglos.gov.uk\)](https://www.southglos.gov.uk/child-protection/safeguarding)
- 6.2.2** In addition to working with the safeguarding team all staff members should be aware that they may be asked to support social workers to take decisions about individual cases.

7. Procedures

To underpin this policy, Circomedia has procedures for safeguarding and the Prevent Duty, see Appendices

To maintain safe and professional working practices, all staff must adhere to the Staff Code of Conduct.

The policies listed in 9. *Linked Policies* below also include relevant policies.

8. Monitoring and Review

The DSL/CEO will monitor and review this policy annually through the following steps.

- 8.1 Monthly meetings will take place between the DSL and DSOs to discuss and review any ongoing, arising or historic safeguarding issues or concerns, minutes from which will be used to inform the annual review.**
- 8.2 An annual report will be prepared for the Board of Trustees.
- 8.3 Any significant deficiencies or weaknesses regarding safeguarding and child protection arrangements will be addressed as soon as they are identified, and the issues and remedies reported to the trustees.
- 8.4 This policy should not be read in isolation and should be cross-referenced with all relevant Circomedia policies and procedures.

9. Staff Safeguarding

In addition to this document staff safeguarding is supported directly through the following policies which are essential documents located on Breathe HR

- Staff Code of Conduct
- Disciplinary policy and procedure
- Equal Opportunities and Dignity at Work Policy
- Grievance Policy and procedure
- Safer Recruitment Policy
- Staff Handbook
- Whistleblowing Policy
- Sexual Harassment Training Document
- Anti-Harassment and Bullying Policy

10. Linked Policies

Below are listed specific policies that link to this policy, which are available on Breathe HR and the Circomedia [website](#).

- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Health and Safety Policy
- Student Disciplinary Policy
- Bullying and Harassment Policy
- Staff Code of Conduct

11. Appendices

1. Safeguarding and Reporting Concerns: Essential Guidance for Staff
2. Safeguarding Resources: Distinguishing Between Fact And Opinion
3. Flow Chart Showing Safeguarding Procedure

Appendix 1

Safeguarding and Reporting Concerns: Essential Guidance for Staff

This document forms part of the Circomedia Safeguarding Policy

Everyone's Responsibility

- Safeguarding is the responsibility of every staff member.
 - Never assume someone else has reported a concern you have noticed.
 - Prompt action is essential to ensure the safety and well-being of children and Adults at Risk.
-

Why is Recording Important?

- Our organisation has a legal duty to promote the well-being and safety of children and Adults at Risk.
 - Members of staff observe individuals in different contexts throughout the day and may notice signs of harm or neglect.
 - Concerns may arise from:
 - A single serious incident.
 - An accumulation of smaller incidents, forming a "jigsaw" of evidence.
 - Recording ensures concerns are documented accurately and shared with the Designated Safeguarding Lead (DSL) or Officers (DSOs).
-

What Constitutes a Safeguarding Concern?

A concern may include, but is not limited to:

- Changes in behaviour or unusual behaviour patterns.
 - Physical injuries inconsistent with typical activity-related injuries.
 - A child or adult at risk disclosing that something has happened to them.
 - Observations of a child's or adult at risk's physical condition.
 - Concerning behaviour or information involving a parent or carer.
-

How to Report a Concern

1. Document your concern immediately.
 - Write a clear, factual account of what you observed, heard, or were told.
 - Avoid interpretations or assumptions.
 2. Send your report via email to Safeguarding@Circomedia.com.
 - This ensures the information is promptly received and actioned.
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Why Written Records Are Necessary

- A written record ensures clarity and avoids misinterpretation.
 - First-hand accounts provide the most reliable information for safeguarding decisions.
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What Happens Next?

- Review and Action by the DSL/DSOs:
 - Your report will be reviewed to determine the appropriate response.
 - Actions may range from monitoring the individual to involving external safeguarding agencies.
 - Confidentiality:
 - Safeguarding records are shared only on a strict “need-to-know” basis. Parents or carers do not have automatic access to these records.
-

Will Parents Be Informed?

- The DSL/DSOs may share concerns verbally with parents to address the issue collaboratively.
 - If discussing concerns with parents poses a safety risk, the DSL/DSOs will consult with external safeguarding professionals before proceeding.
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Retention of Records

- Safeguarding records are retained in line with Department for Education (DfE) guidelines.
 - Records are transferred confidentially when a child moves to a new setting.
 - In most cases, records are kept until the individual reaches the age of 25.
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Key Points to Remember

- Always act promptly and never delay reporting a concern.
- Send all safeguarding concerns via email to Safeguarding@Circomedia.com.
- If in doubt, consult the DSL or a Safeguarding Officer for guidance.

Links to further resources and policies will be provided to support you in safeguarding responsibilities.

Appendix 2 Safeguarding Resources

Safeguarding Resources: Distinguishing Between Fact And Opinion

Safeguarding records should be factual using the child or adult's own words, wherever possible, in cases where a disclosure is made.

In cases of disclosure and in cases where staff/anyone is raising a concern *themselves* it is important to distinguish what is a fact or factual observation and what is the report writer's opinion. Professional opinion can be given but needs to be supported by stating the facts and observations upon which the opinions are based.

Consider each of the statements below. For each one decide whether it is a fact or an opinion.

Statement	Fact or Opinion?
1. Being unemployed is depressing Mrs Bloggs.	
2. Alan said his mother smacked him.	
3. On the last contact visit the living room was not safe for the children	
4. The clothing in which Mr. Smith had dressed the baby was not appropriate	
5. Foster Care is not appropriate for Ian	
6. Jenny is a very contented child.	

Rewrite one statement that contains an opinion in a way that makes the difference between fact and opinion clear.

Appendix 3 Flow Chart Showing Safeguarding Procedure Safeguarding Procedure

