

Safeguarding

Under 18s and Adults at Risk

Background

1. The National Film and Television School (the NFTS) is committed to providing a safe and secure environment for all students, employees and individual visitors who access its facilities and services.
2. The NFTS acknowledges its particular responsibility to safeguard the wellbeing of Under 18s and Adults at Risk engaged in the range of the School's activities. This is achieved by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment, and to deal with issues concerned with suspected or reported abuse of Under 18s or Adults at Risk.
3. The School recognises that it has a duty to help employees and students understand their responsibilities (through guidance, support and training), to minimise risk, and to avoid situations (when possible) where abuse or neglect might arise or be alleged.
4. If you are unsure about any aspect of this policy, you should contact the Principal Safeguarding Officer immediately (see Appendix 1 for contact details).
5. This procedure applies to all NFTS students, including apprentices. Where this document refers to 'students' this will include apprentices unless specified otherwise.

Definitions

6. This policy adheres to and is driven by external policy and legislation.
7. The definition of 'a child' in child protection guidance is: - a child is anyone who has not yet reached their eighteenth birthday. Throughout this document 16-17-year-old students are referred to as 'Under 18s'.
8. The definition of an 'Adult at Risk' is: - an adult who needs community care services because of mental or other disability, age or illness and who is, or may be, unable to take care of themselves against significant harm or exploitation. The term replaces 'vulnerable adult'.
9. Employees should note that this policy only applies to those who fall into either of the above categories and does not apply to those who may require welfare support, but do not fall into these categories.

Scope

10. This policy is intended to give a framework for employees in the unlikely event that a safeguarding issue arises.

11. The School has a responsibility to safeguard and promote the welfare of Under 18 and Adults at Risk who participate in organised activities or services. These include registered students who are Under 18 or an Adult at Risk, and Under 18s or Adults at Risk who come onto the School's site as part of organised activities such as visits or summer schools. This responsibility extends to NFTS employees working off site (e.g. professional placements, widening participation and recruitment activities in local schools or FE Colleges). The School must ensure that reasonable steps to promote and safeguard the welfare of Under 18s or Adults at Risk are taken, and that the policy and procedures regarding those matters are easily accessible to all employees and students.

General Principles

12. All School employees are in a position of trust; in particular those who teach, support, guide or in any way interact with students. It is incumbent on all employees to be aware of this and to act accordingly at all times. The School's responsibilities extend to safeguarding Under 18s or Adults at Risk who come into contact with its employees and students outside of the School's premises as part of work that maybe conducted on professional courses.
13. The School endeavours to have a comprehensive approach towards safeguarding, but the safeguards that are put in place are generally those appropriate for a higher education institution serving a predominantly adult community.
14. The NFTS will work collaboratively, where appropriate, with employers offering work-based learning to students to safeguard Under 18s or Adults at Risk.

Responsibilities

15. The School has appointed a Designated Safeguarding Lead (DSL) for the BFI Academy and a Designated Safeguarding Officer (DSO) for other School-related activities. See Appendix 1 for contact details.
16. Employees and students working in direct contact with Under 18s or Adults at Risk on a day-to-day basis, e.g. employees involving in teaching and providing pastoral guidance to students, may come across signs of harm and/or abuse. Employees should note that it is not their responsibility to try to resolve the issues, but they may be asked to help with student liaison in some circumstances. Employees must ensure that significant concerns for the wellbeing of an Under 18 or Adult at Risk are reported to the DSO or DSL, as quickly as possible, see appendix 1 for contact details. Please refer to paragraphs 28-38 for more information on why it is important to report matters to the DSL or DSO, as appropriate.
17. The Prevent duty, introduced as part of the Counter Terrorism and Security Act 2015 means that Universities and Colleges are legally required to take steps to prevent students from being drawn into terrorism. The School recognises the positive contribution it can make towards protecting members of its community from radicalisation and extremism and has developed a PREVENT Risk Assessment and Action Plan.

18. It is the role of the DSL/DSO to invoke the appropriate procedures to protect the Under 18 or Adult at Risk, involving appropriate local social care teams and police as soon as a cause for concern is raised.
19. If an allegation of abuse or inappropriate behaviour is made against an employee, and relates to their actions as a member of the School, in addition to actions set out in paragraphs 39-40 below, Human Resources (HR) will advise and guide the line manager of the employee, and the employee against whom allegations have been made, in relation to employment issues.
20. Where an allegation of abuse or inappropriate behaviour is made against a student and relates to their actions as a member of the School, in addition to actions set out in paragraphs 28-38 below, the Registrar will offer advice and guidance in relation to student discipline issues.

Principles – Guidance to employees

The following general principles should be adhered to by all employees:

21. Safeguarding issues are to be regarded as everyone's responsibility and employees are reminded that it is the welfare of the Under 18 or Adult at Risk that is of a primary concern, and it is their duty to report any concerns to the DSL/DSO.
22. If employees, in the course of their work at the School, have an Under 18 or Adult at Risk protection issue brought to their notice, observe an incident of abuse, or have cause for concern, they must treat this as a priority over other work and address the issue immediately.
23. If employees wish to seek guidance with regard to a specific incident or area of concern, confidential advice should be sought from the DSL/DSO.

Code of Behaviour and good practice

24. Employees and partners of the School, including Security and the Students' Union, should be encouraged to demonstrate exemplary behaviour when working with Under 18s or Adults at Risk in order to protect the Under 18 or Adult at Risk from abuse, and themselves from false allegations. The following are common sense examples of how to create a positive culture and climate.

Always put the welfare of the Under 18 or Adult at Risk first.

- Wherever possible, maintain a register of Under 18s or Adults at Risk working with you at any given time.
- Work in an open environment, avoiding private or unobserved situations and encouraging open communication.
- Avoid spending time alone with Under 18s or Adults at Risk away from others. Personal tutors should ensure they meet their Under 18s or

Adult at Risk tutees either in a public place (e.g. the Rose Cafe) or in an office with other employees within sight and hearing.

All Under 18s or Adults at Risk, regardless of any protected characteristic under the Equality Act 2010, must be treated with respect and dignity and provided with the same equality of opportunity.

- Maintain a professional relationship with Under 18s or Adults at Risk. It is never appropriate for employees, or volunteers to have a sexual relationship with an Under 18 or Adult at Risk.
- Ensure that if any form of manual/physical touching is required as an element of a seminar, workshop or similar, it is provided openly and with the persons explicit consent. It is better to ask and risk embarrassment than to not ask and risk a serious misunderstanding.
- At certain events (e.g. Open Days, visits, etc.) involve parents/carers/teachers wherever possible, e.g. by ensuring they take responsibility for the Under 18s or Adults at Risk in their care.
- Where required give constructive feedback rather than just negative criticism.
- Keep a written record of any injury that occurs, along with the details of any treatment given, following the School's [Health and Safety Policy](#)
- Attend relevant training courses that the School provides.
- Ensure that consent has been obtained to allow Under 18s or Adults at Risk to take part in organised trips or activities outside the normal place of study.

25. The following should never be sanctioned. When undertaking business for the School you should never:

- Allow allegations made by an Under 18 or Adult at Risk to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse and bullying).
- Reduce an Under 18 or Adult at Risk to tears;
- Engage in rough, physical or sexually provocative games, including inappropriate horseplay;
- Share a bedroom with an Under 18 or Adult at Risk;
- Allow or engage in any form of inappropriate (i.e. sexualised) touching with an Under 18 or Adult at Risk;
- Allow an Under 18 or Adult at Risk to use inappropriate language unchallenged;
- Allow an Under 18 or Adult at Risk to become verbally or physically aggressive with others unchallenged;
- Make aggressive or sexually suggestive comments to an Under 18 or Adult at Risk, even in fun;
- Engage in any non-professional form of relationship, sexual or otherwise, with a young person in your care, even if the Under 18s or Adult at Risk is over the age of consent (this is an abuse of a position of trust);
- Do things of a personal nature for an Under 18 or Adult at Risk that they can do for themselves;
- Invite or allow an Under 18 or Adult at Risk to stay with you at your home
- Give an Under 18 or Adult at Risk personal details such as your phone number, email or home address [if it is essential to disclose any such details please ensure that a Designated Safeguarding Officer is aware of this BEFORE you do so];

- Take photographs or videos of an Under 18 or Adult at Risk unless consent has been obtained [this includes the use of camera phones]
- Give or receive gifts from an Under 18 or Adult at Risk.

26. It may sometimes be necessary for employees or volunteers to do things of a personal nature for Under 18s or Adults at Risk, particularly if they are young or are disabled. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

How to recognise forms of abuse

27. There are six main forms of abuse, although there are variations within these. Abuse or neglect of an Under 18 or Adult at Risk is caused by inflicting harm, or by failing to act to prevent harm. Under 18s or Adults at Risk could be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger.

- (i) **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an Under 18 or Adult at Risk, including by fabricating the symptoms of, or deliberately causing, ill health to an Under 18 or Adult at Risk.
- (ii) **Emotional abuse** is the persistent emotional ill-treatment of an Under 18 or Adult at Risk such as to cause severe and persistent adverse effects on the Under 18 or Adult at Risk's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. This may cause fright and lead to exploitation or corruption.
- (iii) **Sexual abuse** involves forcing or enticing an Under 18 or Adult at Risk to take part in sexual activities, whether or not the Under 18 or Adult at Risk is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving an Under 18 or Adult at Risk in looking at, or in the production of, pornographic material, or encouraging them to behave in sexually inappropriate ways.
- (iv) **Neglect** is the persistent failure to meet an Under 18 or Adult at Risk's basic physical and/or psychological needs, likely to result in the serious impairment of health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to basic emotional needs.
- (v) **Bullying** is the deliberate, hurtful behaviour, direct or indirect, usually repeated over a period of time where it is difficult for those being bullied to defend themselves. Bullying can be verbal, written or physical. Harassment and bullying is not always open, direct and simple to identify. It can be covert and very subtle. Perpetrators may not always be aware that their action(s) have been perceived to be offensive.
- (vi) **Radicalisation.** Indicators that a person is being drawn into violent extremism or crime may include:
 - The use of inappropriate language
 - Possession of violent and /or extremist literature
 - Behavioural changes
 - Expression of extremist views
 - Advocating violent action

- Association with known extremists

In most cases it would not be appropriate to respond to these concerns through welfare arrangements and processes. In cases such as this the School's Prevent Lead must be informed to assess whether a Prevent referral is required. Contact details of the Prevent Lead are provided in Appendix 1.

Information for employees

28. Recognition of abuse is not always easy and the School acknowledges that its employees and students may not be experienced in this area and indeed, that it is not the place of School employees to make such a judgement. It is however the responsibility of all members of the School to act on concerns in order to safeguard Under 18s or Adults at Risk.
29. The following may indicate that an Under 18 or Adult at Risk is being, or has been, abused:
- Unexplained or suspicious injuries, particularly if the injury is unlikely to have occurred accidentally.
 - An injury where the explanation from the Under 18 or Adult at Risk appears contradictory.
 - The Under 18 or Adult at Risk describes an abusive act or situation.
 - Unexplained changes in behaviour.
 - The Under 18 or Adult at Risk appears distrustful of adults.
 - The Under 18 or Adult at Risk behaves in an inappropriate way or sexually explicit way.
 - The Under 18 or Adult at Risk is withdrawn.
 - The Under 18 or Adult at Risk becomes increasingly dirty or shabbily dressed.

Incidents that must be reported or recorded

30. If any of the following occur you should report this immediately to the DSL/DSO:
- If an Under 18 or Adult at Risk reports an allegation of abuse involving a member of their family or someone involved in their home, school or social life.
 - If an Under 18 or Adult at Risk has an accident.
 - If you accidentally hurt an Under 18 or Adult at Risk.
 - If an Under 18 or Adult at Risk reports an allegation of abuse regarding a member of either the School or an external organisation using School facilities.
 - If an Under 18 or Adult at Risk appears to be sexually aroused by your actions.
 - If you are concerned that a relationship is developing that could represent an abuse of trust.
 - If you are concerned that the Under 18 or Adult at Risk is becoming attracted to you.
 - If you are concerned that a colleague is becoming attracted to someone in their care.
 - If an Under 18 or Adult at Risk seriously misunderstands or misinterprets something you have done.

If you have had to use reasonable physical restraint to prevent an Under 18 or Adult at Risk harming themselves, or another, or from causing significant damage to property.

- This list is not exhaustive but provides some examples of incidents that must be reported. **If in doubt contact the DSL or DSO for a confidential discussion of your concerns.**

Dealing with allegations or suspicions of abuse

What to do if you think abuse might be or is taking place

31. No member of the NFTS, in a paid or unpaid capacity, should take responsibility to decide whether or not abuse has taken place. However, there is a requirement to act on any concerns.
32. Before completing a referral to the DSL or DSO you should inform the student in question that you will be forwarding a concern through this process. If the student does not want to allow a referral, you should explain that you need to do so given the concerns, and are unable to support them personally. You may discuss this with the DSL or DSO in confidence by speaking about the case without using student name or identifying characteristics to ascertain whether a referral is needed. It is advised if you have questions about a case to contact the DSL or DSO to discuss.
33. The problem should be reported IMMEDIATELY to the DSL or DSO who will take the appropriate action.
34. If the concerns relate to the DSL or DSO, then the matter should be referred to the Director of Human Resources who will in turn refer the matter to the local Social Care team.
35. It is important to maintain confidentiality. Suspicions must not be discussed with anyone other than the above-mentioned employees. If none of the above mentioned are available the person with the concerns must not delay, and should contact the Registrar.
36. If an Under 18 or Adult at Risk says something or acts in such a way that abuse is suspected, the person receiving the information should:
 - Not give assurances of confidentiality which cannot be kept but should reassure the Under 18 or Adult at Risk that the information will only be passed on to those people who need to know.
 - React in a calm but concerned manner.
 - Tell the Under 18 or Adult at Risk that s/he is right to share what has happened; and that s/he is not responsible for what has happened.
 - Take what the Under 18 or Adult at Risk says seriously.
 - Keep questions to an absolute minimum only to clarify what the Under 18 or Adult at Risk is saying, not to interrogate.
 - Not interrupt the Under 18 or Adult at Risk when they are recalling significant events.
 - Make a full written record of what is said and done, though this should not result in delay in reporting the problem

The written record should include:

- The Under 18 or Adult at Risk's disclosure. This may be used later in a criminal trial and it is vital that what the Under 18 or Adult at Risk discloses is recorded as accurately as possible. Therefore, the record must be drafted in the Under 18 or Adult at Risk's words and should not include the assumptions or opinions of others.
- The nature of the allegation or concern.
- A description of any visible physical injury (clothing should not be removed to inspect the Under 18 or Adult at Risk).
- A description of the situation, what the discloser was wearing, where the disclosure took place, what time, who else was present, what prompted the disclosure (e.g. if a particular topic was being discussed).
- The Under 18 or Adult at Risk's account of what has occurred.
- Any dates, times or places or any other potentially useful information, particularly including phone numbers or addresses to which the School has access.

37. The DSL/DSO has the responsibility to act on behalf of the School in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation or suspicion and referring the matter to the appropriate statutory authorities. It is the task of the local Social Care team, not the School, to investigate the matter under section 47 of the Children Act 1989 or Safeguarding Vulnerable Groups Act 2006. Normally the DSL or DSO will make the referral within 24 hours of notification being received, although this may not be possible on certain occasions.

38. Under no circumstances should a member of the School carry out their own investigation into suspicions or allegations of abuse, neither should they question the Under 18 or Adult at Risk closely, as to do so may interfere with any investigation that may be undertaken subsequently by the Police or local Social Care team.

Procedure for dealing with allegations or suspicions of abuse against an employee of the School at work

39. These situations can be extremely difficult to deal with. It can be difficult to accept that a colleague may have harmed an Under 18 or Adult at Risk. It may also be that the behaviour that causes concern is bad practice rather than abuse. When a concern arises, there are three processes that may need to take place. These are:

- An Under 18 or Adult at Risk protection investigation.
- A criminal investigation.
- Action by the School under the Employee Disciplinary Procedure.

40. It is important that the above actions are properly co-ordinated and that events are managed in the right order. For this reason, the School will take no direct action against an employee without the advice and agreement of the investigating agencies (e.g. the police or local social care team), except where such action is immediately necessary to protect an Under 18 or Adult at Risk.

N.B. If, following consideration and any consultation, the concern is clearly about bad practice rather than abuse, the DSL/DSO and HR will take the necessary action to advise on, manage, or instigate disciplinary action against the member of the School about whom the allegation has been made.

Procedure for Dealing with Concerns of Possible Abuse Outside of the School

41. As a result of their contact with an Under 18 or Adult at Risk, members of the School may become concerned about the welfare of the Under 18 or Adult at Risk and may be concerned that abuse is being perpetrated by someone unconnected with the School.
42. In these circumstances the individual should report their concerns to the DSL/DSO as outlined in paragraphs 29-39.
43. Similarly, if members of the School are concerned that abuse is being perpetrated by a student or School employee against someone unconnected with the School, the individual should report their concerns to the DSL/DSO.
44. In the former circumstances there may be implications as to whether or not a student can continue on their course. The DSL/DSO must discuss the issues with the appropriate course leader, and the Registrar.

If a referral has taken place, who should be informed

45. It is important that when a referral has taken place, careful consideration is given to whom should be informed, as the matter must be treated with sensitivity and confidentiality.

Other (less serious) incidents

e.g. – any incident of an Under 18 acting illegally. This includes drinking or purchasing alcohol

46. Any incident of an Under 18 acting illegally must be reported to their parent or legal guardian. If a student persists in acting in such a way, they may be subject to disciplinary action under the Student Disciplinary Procedures, or Fitness to Practise Procedure.

DBS Certificates – which employees should have them

47. All employees who are expected to have individual responsibility at any point for any Under 18 or Adult at Risk will be required to have a DBS. This is managed through Human Resources under the DBS Policy.

Admissions policy on Under 18s and Adults at Risk

48. Parents and guardians of Under 18s and Adults at Risk will be required to sign a consent form for parents/guardians. The form makes it clear we will not be acting in loco parentis but will take reasonable steps to ensure an appropriate environment. The form requires a primary contact in case of emergency.

Monitoring and reporting

49. The application of the procedures will be monitored, by the DSL, in accordance with

the School's duty under s.149 (public sector equality duty) of the Equality Act 2010, to ensure consistency of approach and compliance with relevant legislation.

50. On an annual basis a summary report of referrals made will be reported to the Board of Governors, although the report will not include any personal details about the individuals involved (such as name, student number, address).

This Policy was approved in November 2023

Appendix 1: Contact List

Designated Safeguarding Lead (BFI):

Jon Wardle

Jwardle@nfts.co.uk

Designated Safeguarding Officer:

Eleanor Wheal

Ewheal@nfts.co.uk

Tel: 01494 731331

Prevent Lead:

Eleanor Wheal

Ewheal@nfts.co.uk

Tel: 01494 731331