

Policy Handbook
Unscene Suffolk
Registered Charity No. 1164019

Contents

Policy	Last review	Next review
1. Equal Opportunities Policy	August 2022	August 2024
2. Code of Conduct – Staff and Volunteers	April 2023	April 2024
3. Safeguarding Vulnerable Adults Policy	July 2023	July 2024
4. Comments, Complaints and Compliments Policy	July 2022	July 2025
5. Data Protection Policy	July 2023	July 2024

Unscene Suffolk

Equal Opportunities policy

Introduction

Unscene Suffolk, hereinafter referred to as the Organisation, strives for high standards both as an employer and as a provider of services. In so doing, we wholeheartedly support a policy of equal opportunities in all areas of our work and responsibilities.

STATEMENT

The Organisation is an equal opportunities employer and promotes equality of opportunity through all of its activities. It aims to ensure that no job applicant, employee, volunteer, trustee, member or service user receives less favourable treatment on the grounds of race, gender, marital and civil partnership status, sexual orientation, religion or belief, age, physical, sensory or learning disability, gender reassignment, pregnancy and maternity, nor is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

The principle of Equal Opportunities will apply to recruitment, promotion, transfer, training, benefits, facilities, procedures and all terms and conditions of employment.

The Organisation is committed to reviewing this policy on an bi-annual basis, and will ensure that its personnel are regularly reminded of these statements of policy.

POLICY

Introduction

This policy has been produced to provide guidance, which will enable the Trustees, Committees, staff, volunteers, members and service users of the Organisation to comply with anti-discrimination legislation. The policy will also address anti-discrimination issues involving any other people who currently fall outside any legislation. Failure to follow the procedures in the policy may lead to disciplinary or other appropriate action.

Definitions

The Equality Act (2010) describes nine “protected characteristics”.

Discrimination - a situation where a person is treated less favourably on the grounds of:

- race, colour, nationality, ethnic or national origin
- gender
- marital and civil partnership status
- sexual orientation
- age

- physical, sensory or learning disability
- gender reassignment
- religion and belief (including lack of belief)
- pregnancy and maternity.

In addition to the nine “protected characteristics”, the Organisation would not discriminate against people, because of:

- mental health
- caring responsibilities
- class
- HIV status
- employment status
- unrelated criminal convictions
- union activities.

The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service. Failure to make reasonable adjustments is where a rule or policy or way of doing things has a worse impact on someone with a protected characteristic compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

It is unlawful to discriminate against or harass a member of the public or service user in the provision of services or goods or to fail to make reasonable adjustments to overcome barriers to using services caused by disability. However discrimination may be lawful if there is an occupational requirement which is core to a job role and a proportionate means of achieving a legitimate aim.

Associated Discrimination is direct discrimination against a person because they associate with another person who possesses a protected characteristic.

Discrimination by Perception is direct discrimination against a person because it is perceived that they possess a particular protected characteristic.

Indirect Discrimination is the imposition of a requirement or condition, which has disproportionate and / or adverse effect e.g. only recruiting people with English qualifications.

A person must be able to act against unlawful discrimination without fear of reprisals or being subjected to a detrimental effect. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.

Victimisation means subjecting a person to detrimental treatment because they are or are believed to be bringing proceedings under the Equality Act; giving evidence or information in connection with proceedings under the Equality Act; doing any other thing for the purposes or in connection with the Equality Act or making an allegation that a person has contravened the Equality Act.

Harassment means unwanted behaviour relating to a protected characteristic that has the purpose or effect of violating a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive environment. It does not matter whether or not this was intended by the person responsible for the conduct.

Harassment by a third party means unwanted, repeated conduct by a third party based on a protected characteristic, which has the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment for a person and where the employer does nothing to prevent it from reoccurring. A third party is defined in law as not being the employer or employees of the employer, but people such as customers or clients.

Aims

- To ensure equal access to jobs, volunteering and services
- To ensure compliance with legislation on discrimination and equality (including the Equality 2010 Act and any other legislation which becomes law)
- To create environments free from harassment and discrimination
- To maximise the use of resources in the best interests of staff, volunteers and service users.

Objectives

- Trustees, staff, volunteers, members and service users will be encouraged, by example and guidance, to challenge discrimination where and whenever it arises, whether it be between colleagues, or in any other area relating to the Organisation's work.
- Trustees, Committees, staff and volunteers of The Organisation will be made aware of this policy. A necessary qualification for any position in The Organisation will be a willingness to accept and implement this policy.
- Positive action will be taken to ensure so far as is reasonably practicable that all the Organisation's premises and services are accessible to all people.
- The Trustees will monitor and review annually equality of opportunity relating to the Organisation's services.
- Recruitment and selection procedures will be monitored and reviewed annually by the Trustee Board.

- In order to address discrimination and disadvantage within the workplace, the Organisation will ensure that employment and advancement within the Organisation is determined by objective criteria and personal merit. Recruitment and employment practices will reflect a commitment to Equal Opportunities.

Implementation

- Responsibility for implementing and developing the policy rests with the Trustees.
- Any staff member or volunteer who feels they have been unfairly treated in a way contrary to the intention of this policy should raise the issue with the Trustees.
- Any service user who feels they have been unfairly treated in a way contrary to the intention of this policy should make a complaint to the Trustees.
- Any member of staff found to be in breach of this policy will be subject to disciplinary action.
- Any volunteer found to be in breach of this policy will be counselled on their actions and may, where necessary, be removed from the register of accredited volunteers.
- Any member of the Trustee Board, any committee or working party of the Organisation found to be in breach of this policy will be counselled and may, where necessary, be asked to leave the organisation.
- Any service user found in breach of this policy will be counselled on their actions and may, where necessary, be referred back to their organisation.
- Any job applicant who believes that they have been treated unfairly and contrary to the intention of this policy should raise the issue with the Trustees.

Recruitment and Promotion

- The Organisation will strive to ensure that trustees, staff and volunteers reflect the wider communities.
- Clear and accurate information regarding vacant posts should be available through advertisement, job or role descriptions, person profiles and the interview. Vacancies should be advertised sufficiently widely in order to reach, within reason, the widest possible range of candidates, either internal and/or external.
- Unless a genuine occupational qualification exists which limits a post to a particular group, advertisements and recruitment literature should not imply any preferred group.
- Applicants will be informed, through advertisements, job or role descriptions and application forms, of the Organisation's commitment to equal opportunities and the existence of an Equal Opportunities Policy.

- Person specifications should only include requirements, which are necessary and justifiable. Requirements, which are convenient rather than necessary, may be discriminatory.
- Any information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection legislation.

Interviewing and Short listing

- An interview panel will be selected for each vacant post as and when necessary. The size and composition of this panel may vary according to the vacant post. Care should be taken to reflect the gender, disability and ethnic make up of the Organisation when selecting the panel.
- The short-listing panel will not select candidates on the basis of the gender, name, possible disability or age of the candidate. They should record reasons for rejecting any candidate at the shortlisting stage.
- Interviews must be undertaken on an objective and equitable basis. Common core questions should be asked of each candidate and suitable evaluation criteria should be used. The interview must only deal with the applicants' suitability and ability to do the job applied for.
- The interview panel must take extreme care not to ask discriminatory questions unrelated to the requirements of the job, e.g. Personal circumstances, gender, race, disablement, sexual orientation, politics, religion, care responsibilities etc.

Training

- In line with the intentions of this policy, The Organisation will not discriminate in the provision of training courses / opportunities wherever possible.
- Briefing on this policy will form part of any Induction Procedure for Trustees, staff, volunteers and committee members.
- The Organisation will strive to ensure that all training will be accessible to all people.

Monitoring and Review

All aspects of personnel policies and procedures shall be kept under review to ensure that they do not operate against the Equal Opportunities Policy.

If it is found that the policy is excluding or discouraging Trustees, staff, volunteers' development or restricting service users, the Trustee Board, through the Manager, should take positive action to re-adjust the policy.

Any information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection legislation.

This Policy along with the Equal Opportunities Statement was approved by the Organisation's Trustee Board on 17/08/2020 and last reviewed in August 2022

New staff and volunteers: Code of Conduct

Driving as part of your work or volunteering

Before giving lifts as part of your work or volunteering, please ensure

- you have DBS clearance which Unscene Suffolk has approved
- you have informed your insurance company that you are driving as part of your work or volunteering

Personal care

Group members will only ever be expecting you to show them to the door of the toilet, and possibly if it is a new building to explain where things are in the cubicle. Staff and volunteers are not expected to give personal care.

Social Media

Many of our staff, volunteers and members use social media which can be helpful when we are promoting shows and events. Please remember that if you accept friend requests from people you meet through Unscene Suffolk, you are inviting these people into your personal network and should therefore only do this if you plan to represent yourself on social media in the same way that you would at a workshop. If you prefer not to have to worry about this then you are absolutely entitled to reject the friend requests or to edit your privacy settings for those individuals so that they do not see all of your activity/information.

Data protection and communication

It is up to you to decide whether to share your personal details such as phone numbers with our adult members. Please do not pass other people's details on without asking first.

Photography

New practitioners, volunteers and participants should be asked to sign a photography/filming and consent form. Lead practitioners should advise participants whenever they plan to take photographs or do filming, in case any participants do not want to be included.

Personal belongings

Everyone is responsible for their own possessions, and our insurance does not cover the theft of personal belongings. We would therefore encourage you to only bring what you need, and not to leave your bags unattended.

UnScene Suffolk – Safeguarding Young People & Vulnerable Adults Policy

UnScene Suffolk Ltd (UnScS) recognises its legal and moral obligation to safeguard from harm all children and vulnerable adults involved in activities that we run or promote. To ensure the safety and protection of all children and vulnerable adults involved in any UnScS activity, all staff, artists and volunteers must understand and adhere to the Safeguarding guidelines set out in this policy, which aims to create safe working practices and a stimulating and creative environment for everyone.

The UnScS Safeguarding policy will be regularly reviewed and issued to all new personnel whether they are full time, part time, freelance staff or volunteers.

The procedures and best practice guidelines contained within this policy are framed by the legal requirements of the Safeguarding Vulnerable Groups Act 2006 and the subsequent revisions contained in the Protection of Freedoms Act 2012.

Definitions

- 1) What we mean by 'Safeguarding'.

Safeguarding - sometimes referred to as 'Child Protection' but can encompass vulnerable adults - means recognising, understanding, and carrying out our responsibility to protect the children and vulnerable adults with whom we come into contact from all forms of abuse, and from accidents, by ensuring that:

- The welfare of the child or vulnerable adult is paramount.
- All children and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity are protected from abuse and exploitation.
- All suspicions and allegations of abuse and exploitation are taken seriously and responded to swiftly and appropriately.
- All UnScS staff, volunteers and artists working with us, or on our behalf, understand their responsibilities and act accordingly.

In addition, UnScS has a duty of care to all its staff, volunteers and artists to minimise the situations in which it might be possible for an accusation of abuse to be made against them.

Please see Pages 4 & 5 of this policy for the contact details of the UnScS Safeguarding Leads and for guidance on how to deal with a suspicion of abuse.

2) What we mean by 'Children and Vulnerable Adults'

The Children Act, 1989, defines a child as a person under the age of 18. Extensions can exist for children who are disabled and for those in local authority care settings. Children who marry before 18 are classed as adults. 'Young Person' has no legal status, but it is used to acknowledge that people aged 16 or 17 may not think of themselves as 'children'. For the purpose of this policy, people aged under 18 are referred to as 'children'.

There is no legal definition of 'vulnerable adult'. Arts Council England recommends, and UnScS accepts, the following definition:

"Vulnerable adults are people who are or who may be in need of community care services because of a cognitive disability or other disability, age or illness, and who are, or who may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation."

For the purpose of this policy 'participant' refers to any child or vulnerable adult who is taking part in an UnScS activity.

3) What we mean by 'Abuse'

Abuse is a situation in which a person has suffered, or is believed to be at risk of, sexual abuse, sexual exploitation, emotional abuse (including bullying), radicalisation, financial exploitation, neglect, or physical injury. The perpetrator may be an adult or a child, and the abuse may have occurred either as the result of direct action by an abuser, or through the failure of organisations or individuals responsible for that person's safety and well-being.

4) What we mean by 'Sexual Abuse'

Sexual abuse is the involvement of individuals in sexual activities to which they did not give or are unable to give informed or legal consent.

It is illegal for anyone to engage in sexual activity with a person under the age of 16. However, Home Office guidance is clear that there is no intention to prosecute teenagers under the age of 16 where both mutually agree to a sexual relationship, and where they are of a similar age.

It is illegal for a person aged 18 or over to engage in any sexual activity with a person under the age of 18 if the older person holds a position of trust in regard to that younger person (for example, their teacher or workshop leader).

The Sexual Offences Act 2003 states that a child aged 12 or under cannot legally give their consent to any form of sexual activity.

5) What we mean by 'Sexual Exploitation'

Sexual exploitation of children and vulnerable adults involves exploitative situations and relationships where a person receives or is promised 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) in return for engaging in inappropriate or illegal sexual activity.

Sexual exploitation can occur through the use of technology (e.g. being persuaded to post sexual images on the Internet) or through activities that prepare the person to engage in inappropriate or illegal sexual activity (e.g. 'grooming').

Violence, coercion and intimidation are common within exploitative relationships, which are often characterised by the child or vulnerable adult's limited ability to make appropriate choices because of their social, economic and/or emotional circumstances.

6) What we mean by 'Emotional Abuse'

The persistent emotional ill treatment of a child or vulnerable adult that results in severe, adverse effects on the emotional or physical wellbeing of that person. Emotional abuse in recreational or social activities might also include situations where parents, staff, artists or volunteers subject those in their care to constant criticism, bullying or unrealistic pressure to perform to their high expectations.

Issues around mental health can affect anyone at any time and are not necessarily caused by, or an indication of, abuse, although incidents of poor mental health may make someone more vulnerable than they might otherwise be. If you have any concerns about a participant's mental health please speak to a Safeguarding Lead.

7) What we mean by 'Radicalisation'

Radicalisation is the process by which an individual or group comes to adopt increasingly radical views in opposition to a political, social, or religious status quo. The Government's Prevent guidance defines radicalisation as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'.

The process of Radicalisation can take many forms but a perpetrator may employ similar methods to those outlined in the 'Sexual Exploitation' and 'Emotional Abuse' definitions, above.

8) What we mean by 'Financial Exploitation'

The Care Act 2014 describes financial exploitation as any situation in which an individual or group's money or property is stolen, defrauded, withheld or otherwise misused.

The process of Financial Exploitation can take many forms, but a perpetrator may employ similar methods to those outlined in the 'Sexual Exploitation' and 'Emotional Abuse' definitions, above.

9) What we mean by 'Neglect'

The failure to protect a child or vulnerable adult from exposure to any kind of undue risk or danger, or a persistent failure to carry out important aspects of their care.

10) What we mean by 'Physical Abuse'

The deliberate physical injury of a child or vulnerable adult, or the wilful failure to prevent physical injury or suffering to a child or vulnerable adult.

Good Practice when working with Children & Vulnerable Adults

Good practice means:

- Treating all children and vulnerable adults equally, and with respect and dignity.
- Putting the welfare of each participant before the setting and achieving of goals.
- Building reciprocal relationships based on mutual trust and, where appropriate, empowering children and vulnerable adults to share in the decision-making process.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Making the arts safe and enjoyable.
- Being an excellent role model.
- Recognising that children or adults with disabilities may be more vulnerable than other people.
- Only touching participants while offering support or during activities when necessary and seeking the consent of participants prior to any physical contact.
- Always trying to work in an open environment (e.g. if you are alone in an office with a participant make sure that the door is open).
- Always trying to avoid being alone with participants for a substantial amount of time.

- Otherwise maintaining an appropriate working relationship with participants.

Inappropriate behaviour includes:

- Engaging in unnecessarily rough, physical or provocative games or behaviour.
- Allowing or engaging in any form of inappropriate touching.
- Allowing a participant to use inappropriate language unchallenged.
- Using inappropriate language when speaking to or communicating with a participant.
- Reducing a participant to tears as a form of control.
- Ignoring or disregarding an allegation made by a participant.
- Doing things of a personal nature for a participant that they can do for themselves.
- Inviting or allowing a participant to stay with you or visit you at your home unsupervised.
- The giving of arbitrary gifts or services.

Questions around what constitutes ‘appropriate language and/or behaviour’ are often dependant on the nature of the activity being undertaken. UnScS believes that arts practices can create a safe space for artists and participants to discuss difficult and/or controversial issues and recognises that what is ‘appropriate’ is often a matter of context.

If you are unclear of what constitutes Safeguarding best practice in any given situation or feel that you are being asked to do something by UnScS that places you or a participant at risk, it is your responsibility to seek advice from the one of the UnScS Safeguarding Leads.

UNSCS Safeguarding Leads

A Safeguarding Lead (sometimes known as a ‘Child Protection Officer’ or ‘Designated Person’) is responsible for ensuring that all UnScS activities adhere to the company’s Safeguarding Policy and is the person to whom any suspicions or allegations of abuse should be reported.

The UnScS’s Board of Trustee’s is responsible for all matters of Safeguarding Policy and has nominated the following individuals to be the company’s Safeguarding Leads:

- **Steve Giddings, Board Member**
steve.giddings@suffolk.gov.uk
- **Clare Burman, Participant Representative**
clare@unscenesuffolk.co.uk

What to do if you suspect or are told about an incident of abuse?

A disclosure (when a participant tells someone that they are being abused) or a suspicion that a participant is being abused, can arouse strong emotions in all of us. It is important to acknowledge these feelings whilst at the same time not allowing them to interfere with our judgement about the appropriate action to take. **Most of us are not trained to deal with situations of abuse or to determine in most circumstances whether abuse has occurred.** It is the responsibility of staff, volunteers and artists to report any concerns to a Safeguarding Lead. **It is not the responsibility of staff, volunteers and artists to deal with suspected abuse.**

Possible signs of Abuse

These are signs which could alert UnScS staff, volunteers or artists to the possibility that abuse may be happening:

- Unexplained bruising or injuries.
- Sexually explicit language and actions.
- Sudden changes in behaviour.
- Something a participant has said.
- A participant suddenly having access to large amounts of money or expensive personal items that they cannot reasonably explain.
- Change observed over time e.g. weight loss or becoming dirty or unkempt.

None of the above are proof of abuse but they may give rise to justifiable concerns.

Responding to a participant making an allegation of abuse (disclosure)

- **Stay calm** and listen carefully to what is being said.
- **Accept** what you are being told.
- **Explain** that the information will need to be shared with others – do not promise to keep secrets.
- **Allow** the participant to continue at their own pace.

- **Ask questions** for clarification only and to ensure a participant's immediate safety. NEVER ask leading questions that suggest an answer – formal interviews should be carried out by a qualified professional, as they may constitute evidence in a subsequent legal action.
- **Reassure** the participant that they have done the right thing in telling someone.
- **Tell them** what you will do next and with whom the information will be shared.
- **Immediately report** what has happened to the relevant Safeguarding Lead.
- **Record in writing** what was said using the participants own words – note the date, time, any names mentioned, to whom the information was given and ensure that you sign and date your record of the conversation. This document should then be given to the relevant Safeguarding Lead as soon as possible.

Safeguarding Lead to refer to the flowchart on page 11 for next steps if there is a report of actual or suspected abuse.

If there is a concern that the participant is in immediate danger, they should call **The Suffolk Safeguarding Children Board's** 24hr 'Customer First' service on: **0808 800 4005** for advice or, in an emergency, the **Police** on: **999**.

Rights and Confidentiality

An alleged abuser and a person thought to have been abused both have the right to confidentiality under the Data Protection Act 1998. Any possible criminal investigation could be compromised if information is inappropriately shared, and it could also have a potentially devastating effect on the lives of all those concerned.

Incidents that must be reported and recorded

If any of the following incidents occur, staff, volunteers and artists must report them immediately to the relevant UnScS Safeguarding Lead. A written record of the incident should be made as soon as possible if, for example:

- A participant is hurt during an activity.
- A participant seems distressed in any way.
- A participant appears to be sexually aroused by the actions of a member of staff, volunteer or artist.
- A participant misunderstands or misinterprets something a member of staff, volunteer or artist has done or said that may be construed within the context of abuse, exploitation or inappropriate behaviour.
- A participant makes an accusation of inappropriate behaviour against a member of staff, a volunteer or an artist.
- A participant makes a disclosure.

- A participant tells you that inappropriate contact has been made through digital, mobile and/or social media, as part of an UnScS project, that potentially indicates attempts by someone to groom and/or exploit them.
- A member of staff, volunteer, participant or artist has made accidental physical contact with someone, during a session, in a way that could be open to misinterpretation.
- Something has occurred which a member of staff, volunteer or artist feels concerned about or is uncomfortable with.

Recruitment procedures

The Disclosure and Barring Service (DBS) was established in 2013 to enable employers, contractors and community groups to make thorough recruitment checks, particularly for positions that involve working with children and vulnerable adults. UnScS reserves the right to carry out DBS checks when necessary, with the co-operation of the individual concerned. The UnScS recruitment procedures for both staff and volunteers include the following policies and procedures to deter those who are unsuitable to work with children and vulnerable adults:

- Identifying posts that need DBS checks when creating Job Descriptions and/or volunteering opportunities.
- Seeking a full employment history for prospective staff members, identifying any gaps or inconsistencies and seeking an explanation.
- Confirming identity through official documents.
- Carrying out appropriate DBS checks.
- Asking for professional references, where appropriate.
- Making all appointments (including internal transfers) subject to a probationary period.

Under the Protection of Children Act 1999 and the Criminal Justice and Court Services Act 2000, it is an offence for any organisation to offer employment that involves regular contact with children or vulnerable adults, to anyone who has been convicted of certain specified offences or included on either of the two DBS Barred Lists. It is also an offence for people convicted of such offences to apply for work with children and/or vulnerable adults.

Disclosure Checks

A Disclosure Check is an application for information held on an individual by the Police and various Government Departments (e.g. a history of any criminal convictions). The New Wolsey Theatre carries out the processing of DBS checks on behalf of UnScS. If an individual has already provided a suitable DBS certificate and subscribes to the Update Service, UnScS will request permission to do an online check.

Staff/volunteer recruitment procedures include an Enhanced or Standard Disclosure check, where appropriate. Any employment offer to certain staff/volunteer roles are conditional on the successful passing of a Disclosure check. A UnScS board

member makes Disclosure check requests to the New Wolsey Theatre; on completion they are verified by a UnScS Board member or UnScS secretary.

Original Certificates of Disclosure belong to the individual staff member/volunteer, but details will be recorded (subject to permission) and stored on the UnScS safeguarding database. The results of Disclosure checks are confidential.

Disclosure checks that contain minor offences do not necessarily affect an individual's suitability to work with participants (e.g. a charge of petty theft). Individuals with minor offences can still work with participants' subject to final approval from the UnScS Board.

Staff/volunteers with DBS Certificates that are more than 3 years old will be asked to complete a new application. UnScS accepts current DBS certificates validated by other agencies if the job role is comparable to their new position with the company. Staff/volunteers who are registered with the DBS update service must provide relevant information and permission for UnScS to check their DBS status through the update service.

DBS update service

This service lets applicants keep their DBS certificates up to date online and allows employers to check a certificate electronically. Applicants can register online with a newly-issued DBS certificate. When you join, you will get an online account that lets you:

- Take your certificate from one job to the next (if the jobs have similar duties/responsibilities).
- Give employers permission to check your certificate online and see who else has checked it.
- Add or remove a certificate.

UnScS currently covers the cost of new DBS Certificates (DBS checks) for relevant staff, volunteers and artists, and encourages them to sign up to the update service.

Barred Lists

The two DBS Barred Lists hold the names of individuals who are unsuitable to work with children or vulnerable adults. It is against the law for employers to employ someone or allow them to volunteer for this kind of work, if they know they are on one of the Barred Lists. The UnScS must refer someone to the DBS if they are:

- Dismissed because they harmed a child or adult.
- Dismissed or removed from work because the UnScS had a reasonable suspicion that they might harm a child or adult.
- About to be dismissed for either of these reasons, but resign first.

If you have any questions regarding Disclosure Checks, please contact one of the Safeguarding Leads.

Use of E-mail, Internet, Social Media, and Mobile Phone Technology

For many, internet, e-mail, mobile phone and social networking are the preferred means of communication. In order to protect participants, staff, artists and volunteers communicating in this way, it is recommended that:

E-mail

- Email communication with a participant should ideally only be sent and received from a registered UnScS account. However, UnScS recognises that this may not always be possible given the nature of the organisation, its work, and the reality of using freelance artists and volunteers to deliver its activities. As such:
- Email communication with participants should ideally be in a group context or with a cc.
- Language should always be clear and unambiguous.

Social Media

In the event of a freelance artist or volunteer using a personal social media account to communicate with participants on behalf of UnScS, the sharing of information or messages through social media should ideally be in a group context and the language used should always be clear and unambiguous.

Permission should be obtained for any images or videos posted on social media sites. Only images and videos relevant to UnScS projects should be used.

UnScS staff, volunteers and artists should not connect with any participants on their personal social media platforms unless the participant is aged 18 or above.

If an UnScS social media group is created for an activity, it should be closed and not open to the general public without the permission of all group members. A designated staff member or volunteer should retain administrative rights and moderate the group, only sharing those rights with other members of staff/volunteers/artists.

Any communication or content that raises concern during any digital interaction with a participant should be saved or printed and discussed with a Safeguarding lead.

Projects and Activities

Project managers should carry out risk assessments as part of all planning processes and continue to monitor the risks throughout the life of the project/activity. As part of the risk-assessment it might be appropriate to establish:

- What staffing levels and resources do we need to safely deliver the project/activity?
- Who will lead or be involved in the activity, and therefore have contact with participants?
- Must that person(s) have a valid DBS Certificate?
- Does that person(s) fully understand the UNScS's Safeguarding policy?
- Do we have all the relevant participant information, permissions and emergency contact details?

- Have we given all the participants the information that they need to safely and successfully engage with the activity?
- Where is the activity to take place?
- What is the procedure for signing participants in and out of the space?
- Does the working environment present any risks in itself, either to the health and safety of the group, or specific Safeguarding risks?
- Does the activity present any risks in itself, either to the health and safety of the group, or specific Safeguarding risks?
- Who is in charge of the building where the activity is to take place, and how do we contact them in an emergency?
- What are the evacuation procedures and who is responsible for evacuating participants?
- Who is the 'appointed person' for the activity (the person deemed to be in charge)?
- How many participants are there?
- Do we understand the needs of the participants, and have we put provisions in place to accommodate them?
- What happens if we are asked to work with a larger group of participants than we think is safe for the activity?
- What happens if some or all of the participants are incapable of engaging meaningfully with the activity?
- What happens if a participant behaves inappropriately during the session?
- What happens if a participant leaves or tries to leave the session or activity?
- What happens if there is an accident or injury during the session?
- If a participant had to be taken to hospital, whom should we inform? Who should accompany them?
- What happens if a participant makes a disclosure during the activity?
- Are there any other factors that we need to address to ensure that the project/activity is safe, creative and inclusive?

Once these questions have been answered and risks identified, procedures, plans, actions and resources should be put in place to mitigate against them.

Productions

Safeguarding issues linked to performances will be identified through **Risk Assessments** (see above).

Digital Performances and Activities

Digital performances and any activities that are delivered in a virtual space should be subject to the same Safeguarding protocols as any other performance or activity.

Participant Awareness

Participants should be made aware of who the Safeguarding Leads are and how to contact them if they have any worries or concerns. They should also be made aware of where to find this policy.

A copy of The UnScS Safeguarding policy is available on the UnScS website:

<https://unscenesuffolk.co.uk/>

or from Participant Representative Clare Burman:

clare@unscenesuffolk.co.uk

Photographs, Videos and Data

Participants involved in UnScS activities must be contacted in advance of any photographs or videos being taken, and explicitly asked for permission for their images to be used by the company.

All records, data, consent forms and any other information that UnScS requests from, or holds on, participants must be collected, used, stored and destroyed in line with GDPR regulations.

In summary

This policy is not a definitive guide to Safeguarding and situations may arise that it does not explicitly cover. If you are ever in any doubt about any issues relating to Safeguarding, or of your personal responsibilities towards the participants that engage with UnScS, please speak to the relevant Safeguarding Lead.

NB: Flowchart on next page.

This Policy was reviewed and approved by the Organisation's Trustee Board on 25 July 2024.

Flowchart for referral for actual or suspected abuse: Adults at risk of harm

See it. Recognise it. Report it.

**If the matter is urgent because an adult at risk of harm is in immediate danger
phone 999 for the Police.**

See it.

Are they safe? If you are concerned about an Adult at Risk of Harm you could help stop abuse if you follow the safeguarding policy and procedure (use this flowchart)

It is not your responsibility to decide if abuse has happened. It IS your responsibility to report it to the Safeguarding Lead and/ or appropriate authority

Recognise it.

- *Share your concerns/ information with the Safeguarding Lead/ Deputy Safeguarding Lead.*
- *For concerns about an Adult at Risk of Harm: Use the Safeguarding Adults Framework to guide your discussions on thresholds for safeguarding referrals*
- *If you need to discuss whether or not a referral is required, call the MASH Professional Consultation Line on 0345 6061499 to speak with a MASH social worker - or use their webchat*
- *If there is immediate danger to the Adult at Risk call 999 for the Police.*

Report it

If you have a concern about an Adult at Risk and need to make a safeguarding referral use the relevant online [Suffolk Adult Care Portal](#)

Contact information

Safeguarding referral: [Via portal](#).

Customer First [0808 800 4005](#)

MASH Professionals Consultation line [03456 061 499](#)

Police: 999 if it is an emergency

Safeguarding Leads: Steve Giddings
Clare Burman

email: steve.giddings@suffolk.gov.uk
email: clare@unscenesuffolk.co.uk

Notes:

reporting for Adults at Risk

It is essential that wherever possible it is the adult at risk who will decide on the chosen course of action, taking into account the impact of the adult at risk's mental capacity where relevant.

However, the people and organisations caring for, or assisting them, must do everything they can to identify and prevent abuse happening wherever possible and evidence their efforts.

Remember ALL notes will be disclosable should a formal or criminal investigation occur. *Ensure that your notes are signed, dated, professional, separate opinion from fact, are recorded verbatim using the same words as were used during the disclosure.*

Comments, Complaints and Compliments Policy

Introduction

Unscene Suffolk, hereinafter referred to as the Organisation, is committed to providing its members and service users with the best possible services which meet their needs and to ensure that they are treated fairly and with respect.

Comments, complaints and compliments provide feedback about what our members and service users think of our services and this feedback will be used to assist the Organisation in continually improving its services.

Comments

A comment is defined as being an idea, suggestion or opinion on how the Organisation could improve its services.

If an individual wants to make a comment on the Organisation's work, this may be done either verbally or in writing.

If an individual wants a verbal comment to be dealt with in accordance with this Policy, rather than being seen as an informal matter, this must be made clear at the time the comment is being made.

When a comment is received, it will be recorded by the organisation's Secretary, or a staff member appointed by the Secretary to ensure it is tracked and responded to within the specified timescales.

The Secretary will pass the comment to the appropriate person who will reply to the person making the comment within ten working days. The reply will include details of any action which the Organisation is to take as a result of the comment.

Complaints

A complaint is defined as being any expression of dissatisfaction with the service that the Organisation provides, whether it is justified or not.

If an individual wants to make a complaint about the Organisation's work, this must be done in writing and the complaint should be sent to the Secretary (unscenesecretary@gmail.com) and the Chair of the Trustee Board.

When a complaint is received, it will be recorded by the Secretary to ensure it is tracked and responded to within the specified timescales.

The process for dealing with complaints is:

- The Secretary will acknowledge receipt of the complaint in writing within ten working days and advise the complainant of the date by which they will be sent a written response. The timescale for responding to the complainant will depend on the nature of the complaint and scale of the resultant investigation into the circumstances which led to the complaint being made, but the board would hope to be able to respond within 14 working days after receipt of the complaint has been acknowledged.
- The Secretary will keep the complainant informed of progress if a response to the complaint cannot be made within the timescales which were originally set.
- The Chair of the Trustee Board will arrange for an investigation into the circumstances which led to the complaint being made. If the complaint is

about the Chair of the Trustee Board, then the Secretary will arrange for the investigation to take place.

Once the investigation is complete the Chair of the Trustee Board, or the Secretary if the complaint is about the Chair of the Trustee Board, will write to the complainant. This response will, when appropriate, offer an apology and / or offer a solution to resolve the complaint. This letter will also advise the complainant of their right to appeal against any decision made, and whom they should contact to escalate the complaint to the next stage in the procedure.

Compliments

A compliment is defined as being feedback which informs the Organisation that it has provided a service well.

If an individual wants to offer a compliment about the Organisation's work, this may be done either verbally or in writing.

If an individual wants a verbal compliment to be dealt with in accordance with this policy, rather than being seen as an informal matter, this must be made clear at the time the compliment is being made.

When a compliment is received, it will be recorded by the Secretary to ensure it is tracked and responded to, if appropriate, within the specified timescales.

The Secretary will pass the compliment to the appropriate person who will reply to the person making the compliment, if appropriate, within ten working days.

Monitoring

A report on Comments, Complaints or Compliments received since the last meeting will be presented to the Organisation's Board of Trustees at each of its meetings.

Data Protection Policy

This Policy has been drafted following guidance from the National Council for Voluntary Organisations.

Definitions

This policy applies to the following two types of data

Personal data is data which can identify an individual, such as a name and address, data of birth or email address.

Sensitive personal data is data which could create a significant risk to an individual's rights and freedoms, for example by putting them at risk of unlawful discrimination. This includes data relating to race, religion, health and sexual orientation.

The key types of data processed by Unscene Suffolk are:

Participant, staff and volunteer contact information and medical / next of kin details.

Names and email addresses of people signed up to our e-newsletter.

Names and addresses of supporters.

Unscene Suffolk Limited is committed to the safe and legal handling and processing of all data, in accordance with the General Data Protection Regulation 2018 (GDPR).

Unscene Suffolk recognises the following data protection principles:

Personal data shall be processed fairly and lawfully.

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Personal data shall be accurate and, where necessary, kept up to date.

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulation.

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Unscene Suffolk will ensure that:

1. All staff and volunteers are aware of relevant Data Protection law and how it affects their work.
2. All personal data collected by Unscene Suffolk is documented via a data map.

3. Appropriate Privacy notices are issued whenever Unscene Suffolk collects personal data.
4. Unscene Suffolk's data processing procedures are adequate in the event of an individual exercising his or her rights as outlined by the GDPR.
5. All data processed by Unscene Suffolk will be on a lawful basis.
6. Where consent is required by law it will be on an opt-in basis and will be freely given, specific, informed and unambiguous.
7. Parental consent will be required for the processing of personal data of anybody under the age of 16.
8. Procedures will be in place to detect, report and investigate any data breach.
9. A 'Privacy by Design' approach will be taken to the creation of any new system involving data processing.

Data Protection Procedures

Data collection

When personal data is collected this will be done privately e.g. in person, by telephone or by email directly to the organisation. Where an intermediary is required (for example to assist a visually impaired person with form-filling), s/he will be given appropriate data protection training and understand the confidential nature of the data.

All forms, whether digital or physical, will include a Privacy Notice explaining how the data will be used, and an opt-in consent field.

Data storage and Processing

Personal data is stored and processed as described in our data map.

All storage platforms are assessed to ensure they provide sufficient protection according to the type of data being stored.

All new categories of data, new storage systems and new processes will be approved by the trustees who will ensure that they give an appropriate level of security and comply with data protection law.

Data destruction

Data will be destroyed when it is no longer required.

In the case of staff, volunteers, participants and supporters, personal data will be held for no longer than five years after the individual ceases to have active involvement with Unscene Suffolk.

Email addresses of individuals who unsubscribe from our mailing list will be stored securely on Mailchimp for the purpose of ensuring that they do not receive communication from Unscene Suffolk, however if a request to delete information is received this will be implemented manually.

Destruction of data means the shredding of paper records, and the permanent deletion of electronic records including deletion of all backup copies and emptying of electronic trash folders.

Data Access Requests

Unscene Suffolk will respond to any data access request within one month of receiving it.

Data will be located by examining each area described on our data map, using both manual and electronic search functions, and will be shared with the individual in an appropriate accessible format.

If repeated requests are received from the same individual, Unscene Suffolk may charge a fee for the administrative cost of supplying the data or refuse to respond. Any refusal to respond must be agreed by the Trustees with responsibility for Data Protection.

Data Breach Procedures

All staff with access to personal data will inform the Chair of Unscene Suffolk immediately in the following circumstances:

- Loss of theft of computer(s) or physical papers containing personal data
- Staff member has reason to believe that unauthorised persons may have accessed personal data via any means.
- Staff member becomes aware of a security breach on any platform used by Unscene Suffolk for the storage of personal data.

The Chair of Unscene Suffolk will investigate all potential breaches and will inform the Trustees if a data breach cannot be ruled out.

If the Trustees consider it likely that individuals' rights and freedoms could be at risk, the Information Commissioners Office will be informed of the breach. This will take place within 72 hours.

If the Trustees believe there is a high risk to individuals' rights and freedoms, the individuals will be notified without undue delay.

All data breaches and the organisation's response will be documented regardless of whether or not the ICO and the individuals are informed.