

The Oxford School of Drama

SAFEGUARDING, DIGNITY AND RESPECT POLICY AND PROCEDURE

1. Key Staff

- 1.1.** Edward Hicks (Principal) Head of Safeguarding
- 1.2.** Liz Wilson (Executive Director)
- 1.3.** Kirsty McFarland (Head of 3 Year Course)
- 1.4.** John Ward (Head of 1 Year Course)
- 1.5.** Ryan Saunders (Head of Foundation)
- 1.6.** Laura Murray-White (Student Services Manager - Sign poster)

2. Policy Statement

The Oxford School of Drama is committed to protecting the welfare of every student irrespective of gender, religion, disability, ethnic origin, or income. The School recognises that the best protection for all students is the vigilance and forethought of staff and tutors in preventing circumstances where abuse of trust could occur. To that end, The Oxford School of Drama will strive to create a safe and secure environment in which all students, staff and tutors can work together confidently and in mutual respect.

2.1. The Oxford School of Drama Safeguarding, Dignity and Respect Policy is in place to be acted on to protect students, staff, and tutors.

2.2. The Oxford School of Drama understands its responsibility to comply with legislation and will continue to review its policy and good practice guidelines at regular intervals.

2.3. Staff and tutors are required to notify the School of any police record they hold prior to or received during their employment or any other factor, which may make them unsuitable to work with the children, vulnerable adults, or the students at the school in general.

2.5. Copies of this policy will be made available to all staff, tutors, and students at the School. Staff and tutors are responsible for ensuring that they are familiar with the guidelines and procedures contained within it. Students are also encouraged to do the same.

2.6. Other documents relevant to dignity and respect (not exhaustive):

- Confidentiality Policy
- Privacy Policy
- ICT Policy
- Disability Equality Policy
- Comments and Complaints Policy
- Disciplinary Policy
- OSD Charter

2.7. The Principal has overall responsibility for ensuring this policy is carried out. He will delegate issues to the Executive Director as appropriate.

2.8. The Executive Director will liaise with the relevant authorities as and when required.

2.9. Students receive on-going support from staff and the administration team with extensive contact hours allowing for continued monitoring specifically through:

- Individual tutorials with the Heads of Courses/Group Tutors
- Individual tutorials with the Principal

3. Definitions

3.1 Duty of Care – The School owes a general legal duty of care to students to deliver its services (such as teaching and pastoral support) to the standard of the reasonably competent educational institution and to act reasonably to protect the health, safety, and welfare of OSD students. As part of this duty OSD, through this policy and procedure, aims to clarify roles and responsibilities particularly in the areas of harassment, sexual violence and hate crime and where students and staff should seek advice and support within and beyond OSD.

3.2. Abuse – a violation of an individual's human and civil rights by any other person or persons. Abuse of a student may consist of a single act or repeated acts over time. Abuse can occur in any relationship and may result in significant harm to or exploitation of the individual. The School recognises that:

- Anyone can experience abuse
- Anyone may be the perpetrator of abuse
- Abuse can take place in any setting
- Abuse may be behaviour that either deliberately or unknowingly causes harm or endangers life or rights

It is acknowledged that abuse may take different forms. Nevertheless, a consensus has built up around determining abuse in terms of:

- **Physical abuse** including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- **Sexual abuse** including rape, sexual assault, sexual innuendos, sexual activity or viewing sexually explicit materials, to which the person has not given consent. (*please see Appendix 1).
- **Emotional abuse** including threats of harm or abandonment, isolation, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse or withdrawal from services or supportive networks.
- **Neglect or acts of omission** including ignoring medical or physical care needs, failure to provide access to appropriate health, social care, or educational services, withholding the necessities of life such as medication, adequate nutrition, or heating.
- **Financial or material abuse** including theft, fraud, exploitation, pressure in connection with wills or property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.
- **Discriminatory abuse** including abuse that is racist, sexist, homophobic or based on disability or age, or other forms of harassment, slurs, or similar treatment.

Staff and tutors working for The Oxford School of Drama are placed in a position of trust in relation to the students. Anyone who abuses that trust will be subject to disciplinary action. It is the responsibility of staff and tutors at the School to report maltreatment of any student.

4. Safeguarding, dignity, and respect procedure to be followed by all staff, tutors, and students

It is the School's responsibility to ensure that it supports students with any issues they may have and to pass on all concerns or disclosures that are raised/made to the relevant authorities and to keep relevant records. It is **not** the School's responsibility (or any member of staff, any tutor, or any student) to find out if abuse has taken place or to investigate suspected abuse. If unsure about your role, please discuss with the Executive Director.

One-to-one situations may be required if the student is to feel confident to raise a concern or make a disclosure. *The student's needs must take priority in this situation.* If faced with this situation staff or tutors must ask the student if they would like someone else to be present – another adult or a friend – but if he/she declines, the staff member should proceed and listen to what the student has to say taking extra care with their behaviour and body language – see disclosure procedure later.

Staff and tutors must not have physical contact at any time or make judgements or offer opinion. Whatever the nature of the complaint, it must be kept confidential. Staff, tutors, or students must not discuss the information with any individual or party other than the key staff highlighted at the beginning of this document.

Safeguarding Procedure:

- a. Concern is reported/observed, or disclosure made
- b. Information is recorded (see specific procedure below)
- c. Information is raised with the Principal, Executive Director, or the Heads of Course, either by email, phone or in person
- d. Information is reported to the Principal (if not directly reported)
- e. The Principal decides on the next course of action and/or seeks further advice from other agencies

4.1. Concerns – if you suspect that an individual is being abused or their welfare is at risk.

- Observe and record what aspects are giving you cause for concern.
- If the concern is being reported to you by another individual, then listen to them and record their concerns.
- Do not directly question the individual who the concern refers to or enter into conversation about the concern.
- Do not make judgements or assumptions about the concern.
- When recording the concern, make a note of any discussion and/or observations, taking care to record the timing, setting and personnel present, as well as what was said.
- Report via the Safeguarding Procedure.

4.2. A disclosure - If a student approaches you and chooses to disclose information to you then follow the below dos and don'ts.

Do:

- Listen, allow the student to talk.
- Stay calm and reassure the person that they have done the right thing by telling you.
- Explain what you have to do next and whom you need to inform.
- Explain that you will need to share information but only on a need to know basis; treated as confidential within an identified small number of staff.
- Make note of the conversation as soon as possible whilst fresh in your mind – follow guidelines on record keeping within this document.
- Report via the Safeguarding Procedure immediately.

Do not:

- Ask leading questions or dig into why they haven't told you or anyone else before.
- Make promises you can't keep.
- Promise to keep it secret – you have a duty to pass the information on.
- Interrogate the individual.
- Criticise the person accused. This may be someone whom they are close to or are in a relationship with.
- Make judgements or offer opinions.
- Discuss the disclosure with any individual or party other than the key staff on a 'need to know basis'.

5. Procedure to be followed by the Principal

If a member of staff, tutor or student reports a concern or disclosure, which involves an individual's welfare, the Principal will:

- Review the information and discuss their reasons for concern including details of any conversations or observations, which are relevant.
- Complete a dynamic risk assessment of the situation by way of discussion with key safeguarding staff.
- Decide on the best course of action, usually in discussion with key safeguarding staff, for that individual case which may include (but not be limited to) involving other key staff. The Safeguarding Lead if required will seek advice from and/or escalate the concern to the Oxfordshire Safeguarding Adult Board plus other relevant agencies.
- Ensure that the relevant staff and the student are kept informed of all subsequent stages.
- Record all actions including reasons for making any decisions.
- Ensure all records are kept confidentially.

6. Staff and Tutor Code of Conduct: Roles and Responsibilities.

This Code of Conduct has been developed for the protection of students, staff, and tutors to ensure that they all have a safe and secure environment to study and work within. To this end, The Oxford School of Drama expects all its staff and tutors to abide by this Code of Conduct.

6.1. To inform The Oxford School of Drama of any relevant police record or other factor, or any change in his/her circumstances, which may make them unsuitable as a member of staff or tutor at the School.

6.2. To recognise that the role of a staff member or tutor at The Oxford School of Drama places them in a position of trust in relation to the students as a whole, including colleagues. Staff members and tutors undertake to uphold that trust at all times.

6.3. To undertake to maintain, within the organisation's procedures, the confidentiality of any information relating to other students, staff members or tutors made available to them.

6.4. Pass all information relating to the welfare of students to the Principal as directed in the safeguarding procedure and as set out in the confidentiality policy.

6.5. Not to behave in any way, physically or verbally, that could cause offense, be threatening or be considered as maltreatment, not forgetting that so-called "banter" can be considered as such.

6.6. To remember at all times that interactions between themselves and students must be such that no reasonable person observing that interaction could construe its nature as abusive. This includes taking care when interacting with students on a one-to-one basis and considering when this may not be appropriate.

7. Student Welfare

Student welfare refers to the general well-being of each student but may also include (but not be limited to) aspects such as common mental health difficulties including anxiety and depression as well as eating disorders, self-harm, substance misuse etc.

Students throughout their course are required to wear appropriate clothing (leotards, black tracksuits etc.) for the majority of their classes. Tutors are aware of changes to the general wellbeing of students as well as changes to their body shape.

7.1. Causes for concern

The Principal and Heads of Courses all have active teaching roles within the school and high contact time with students. Students are encouraged to approach these and/or other tutors if they are concerned about their own or another student's welfare. If tutors are concerned about the welfare and/or well-being of a student then they must follow the safeguarding, dignity, and respect procedure in order to involve key school staff. This information will then be managed by the key staff in order to act in the best interest of that individual student.

7.2. Next steps – the key staff involved will keep in touch the student and if appropriate discuss their concerns with the student and/or the student's parent/guardian.

From here the student will be introduced to appropriate third party agencies as required and deemed necessary by the key staff. These may include but are not limited to:

- Counsellor
- Local GP
- Specialist organisations

7.3. Student Absence - If a student is absent and has not called the office by 9.15am then the following procedure is followed:

- The student is called immediately after registration.
- If they answer the phone, the issue is resolved.
- If they do not answer, a message is left, and the student is e-mailed.
- Phone calls are repeated at half hour intervals for 1.5 hours from the first call.
- If there is no response after 1.5 hours, then the next of kin is contacted to assist.

8. Harassment, Bullying and Intimidation

If you consider you are being subjected to harassment, bullying or intimidation in any form (for example, due to your sex, sexual orientation, gender identification, marital status, race, colour, ethnic origin, age, religion or belief, disability, or any other difference) do not feel that it is your fault or that you have to tolerate it.

8.1. The School's policy on harassment, bullying and intimidation is applicable to all those within the school including staff, tutors, external directors, and students.

8.2. Harassment, bullying and intimidation can seriously worsen working, learning and social conditions for staff, tutors, external directors, and students at the School.

8.3. Incidents of this nature will be regarded as extremely serious and may be grounds for disciplinary action (in line with relevant policies) that may include dismissal or expulsion.

8.4. The School has put in place procedures to enable you to remedy the matter.

- Individuals who believe they are subjected to harassment, bullying or intimidation are encouraged to raise the matter as early as possible with the Principal to give every opportunity to resolve the problem. If the concern involves the Principal, then the matter should be raised with the Executive Director or the Head of Course.
- Students are encouraged to report to tutors if they are concerned about another student's welfare.
- The School aims to deal with incidents of this nature informally - this may especially be appropriate where the complainant simply wants the behaviour to stop. Informal and amicable resolution of differences is usually much easier if matters are raised quickly.
- It is advisable to keep a note of details of any incident or incidents which have caused distress (including any way in which the incident caused a change in pattern of work or learning).
- The first step following an allegation is informal mediation and conciliation. The Principal will conduct all informal mediation of this type unless the issue concerns him in which case the Executive Director or one of the Heads of Courses will mediate.
- Where informal mediation and conciliation fails (or is inappropriate in that specific case), then the School will log a formal complaint.
- For School employees, formal complaints would be through the Complaints and Comments Policy (Staff).
- For students, formal complaints would be through the Complaints and Comments Policy (Student).
- On receipt of a formal complaint the school will investigate the allegation to resolve the issue.
- Any disciplinary proceedings will follow the relevant policy dependent on if the allegation has been made against a staff member, tutor, external director, or student.

8. Allegations and Whistleblowing

8.1. Allegation made against a staff member or tutor

- In the event of an allegation being made against a staff member or tutor the person who receives the allegation must report it to the Principal, Executive Director or Heads of Courses straight away.
- A decision will be made as to whether the matter requires further investigation including but not limited to:
 - A disciplinary or misconduct investigation
 - A child/vulnerable adult protection investigation
 - A criminal investigation
- The person handling the allegation will involve any third party agencies as and when required.
- All parties will be appropriately supported throughout the process including the result of any investigation or actions.

8.2. Allegation made against a student

- In the event of an allegation being made against a student the person who receives the allegation must report it to the Principal straight away. If the allegation involves the Principal, then the report should go to the Executive Director or Heads of Courses.
- A decision will be made as to whether the matter requires further investigation including but not limited to:
 - A disciplinary or misconduct investigation
 - A child/vulnerable adult protection investigation
 - A criminal investigation
- The person handling the allegation will involve any third party agencies as and when required.
- All parties will be appropriately supported throughout the process, including the result of any investigation or actions.

8.3. Allegation concerning yourself

- If you receive an allegation concerning yourself, keep calm and remain professional. Do not get involved in an argument, as it is likely to make the situation worse.
- Inform the Executive Director immediately.
- The Executive Director will record the facts as statements from both parties and ensure that no-one is placed in a position which could cause further compromise.
- Do not contact any other agencies – the Executive Director will do this as and when required.
- Await further instruction from the Executive Director.

8.4. Whistleblowing Policy

- Staff, tutors, and students must be confident that they are able to raise concerns within the school without fear of reprisals/victimisation. The below process should be followed when raising a concern in order for it to be dealt with by the Executive Director and Principal. All allegations of

malpractice/impropriety will be taken seriously by the School, and this will act as a deterrent to potential perpetrators of misconduct.

- Raise the concern with the Executive Director and/or Principal. If the concern involves them raise the concern with one of the Heads of Courses.
- The concern will be recorded and a decision on whether further action should be taken will be made.
- If no further action is taken, the person who raised the concern will be informed.
- If further action *is* to be taken, then the process for allegations will be followed.

10. Prevent Strategy

Prevent is part of the overall Government strategy aimed at reducing the threat to the UK by stopping people becoming terrorists or supporting terrorism. All tutors and staff have a duty to demonstrate and help develop values, which underpin an awareness of social and moral responsibility in modern Britain.

Complying with the Prevent duty including promoting and exemplifying British values: i.e., democracy, rule of law, individual liberty, tolerance and mutual respect and different faiths and beliefs. This includes complying with the Equality Act 2010 by not discriminating against the following people in regards their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

What are British Values?

All tutors and staff are expected to uphold the values embedded within the Equality Act 2010 at all times. All tutors and staff should use any relevant opportunities to promote the values of:

- democracy
- rule of law
- individual liberty
- tolerance and mutual respect for different faiths and beliefs

Tutors and staff will have regular direct contact with students and may get to know them well - you may witness activity and behaviour or receive information which other staff are not privy to. You should refer all concerns to the Principal.

Definition of extremism – “vocal or active opposition to fundamental British values including extremism calls for the death of members of our armed forces, whether in this country or overseas”.

Identification of concerns might include, although this list is not exhaustive:

- Expression of views which are discriminately against protected groups or individuals
- Third party reports of concerns about behaviour e.g., plans to travel abroad or extremist activities
- Evidence of discriminately treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers expectations of behaviour
- Possessing, accessing extremist materials
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on social media

- Use of extremist language
- Threats of violence

10.1. Monitoring and reporting

- Risk assessment to be completed for the School in general. Additional risk assessments and a Prevent action plan will be completed should a student become a concern or if the content of a class or the content of a visiting speaker's talk raises concerns.
- All concerns or disclosures relating to Prevent are reported to the Executive Director.
- The Executive Director in turn will consult and/or report concerns to the Southeast Prevent Co-ordinator.

11. Guidelines for record keeping

- Make brief, factual notes at the time you first become concerned or (if possible) when receiving the concern/disclosure. If unable to make notes at the time, then write these up as soon as possible.
- Write up the brief, factual notes (Do not destroy the notes).
- Make a record of anything you are concerned about and the actions you take as a result (e.g., inappropriate behaviour or a change in behaviour; unexplained injuries; overheard comments; conversations). Report and pass this record to key staff.
- Include the date, time and place of any conversations or observations, and names of anyone else present.
- Try to record conversations verbatim.
- If there is an injury, draw a diagram to record its position.
- Involve the key staff early so they are able to support and assist you in keeping the records and progressing the issue.

Contact details:

- **Oxfordshire Safeguarding Adult Board Triage Team - 01865 328232**
- **Helene Morris: Dfe Regional Prevent Co-ordinator for South East, Counter- Extremism Division**
T: 02045666324: M: 07901384401

Additional resources:

Creating Safe Spaces

<https://www.equity.org.uk/media/1263/agenda-for-change.pdf>

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

<https://www.osarcc.org.uk/> (Oxfordshire Sexual Abuse and Rape Crisis Centre)

<https://www.victims-first.org.uk/crimes/hate-crime/>

<https://www.osab.co.uk/how-to-report-concerns/> (Oxfordshire Safeguarding Adults Board)

Monitoring

A Sub-Committee of the Board of Trustees will monitor the implementation of the Safeguarding, Dignity and Respect Policy and report annually to the Board.

Date: September 2023

Review date: September 2024, earlier if legislation changes

APPENDIX 1

Sexual Misconduct

Sexual misconduct defines a broad range of unwanted conduct of a sexual nature. It may involve physical, verbal or written conduct. It can be carried out, attempted or threatened in person or online, or by an individual or a group. The perpetrator may be known to the person being abused or a stranger.

Sexual misconduct is carried out without the other person's consent and may raise issues around abuse of power or position, as well as preventing equal access to education, opportunities, and career progression.

Any concern or report of alleged sexual misconduct will be taken seriously by the Academy. If reported, an allegation will always be reviewed in line with policy and/or regulation to determine whether an investigation and disciplinary process should be carried out.

Sexual misconduct may also constitute a criminal offence, please see below for further information.

Sexual Harassment

Sexual harassment is unlawful discrimination under the Equality Act 2010, which says that someone sexually harasses another person if they:

- Engage in unwanted conduct of a sexual nature and
- The conduct has the purpose or effect of violating the other person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

This unwanted sexual conduct can happen in person, online, by phone or social media.

Sexual harassment includes a range of behaviours, which may be explicit or more subtle, and can occur as a one-off incident or over a period of time.

Behaviours that may constitute sexual harassment include, but are not limited to:

- Sexual comments, gesturing, making noises, making sexual remarks about someone's body, appearance or clothing, sexual innuendos, suggestive comments or looks, leering or staring

- Making unwanted sexual advances or flirting, making requests for sexual activity or asking for sexual favours, promising something in return for sexual acts
- Asking intrusive questions about a person's private or sex life, discussing their own sex life which is unwanted, spreading rumours or information about someone else's sex life
- Displaying, sending, sharing or showing pornographic material or sexual images in person or via email, text or social media, or requesting explicit images are shared by another person
- Upskirting: taking a photo or video under another person's clothing
- Unwanted physical contact of a sexual nature, touching without their consent including hugging, kissing, massaging, or brushing up against someone
- Stalking
- Indecent exposure: deliberately revealing genitalia to another in order to frighten or upset

Some of these behaviours may also be a criminal offence.

Sexual Assault / Sexual Violence

Sexual assault is any act or attempted act of a sexual nature that happens without another's consent. It can involve a range of behaviours and may take place in different circumstances.

Sexual assault can include:

- Rape, where a person intentionally penetrates another's vagina, anus or mouth with a penis, without the other person's consent
- Assault by penetration, when a person penetrates another person's vagina or anus with any part of the body other than a penis, or by using an object, without the person's consent.
- Sexual assault, which is an act of physical, psychological and emotional violation in the form of a sexual act, inflicted on someone without their consent. It can involve forcing or manipulating someone to witness or participate in any sexual acts.
- Other behaviour may include exposure, sharing explicit images or 'revenge porn', voyeurism and exploitation
- Using pressure, force, intimidation, threats, deception and intoxication

Rape and sexual abuse does not always involve violence, cause an injury or leave visible marks.

When is sexual misconduct a criminal offence?

Rape and sexual assault are serious offences. Remember, you are not to blame.

Sexual misconduct is a term used to describe a range of behaviours of a sexual nature for the purpose of disciplinary proceedings. However, sexual misconduct may also involve behaviours that could be criminal.

Therefore, it's important to consider whether you want to make a report to the police at the earliest opportunity. We understand that this may feel daunting. Our priority is to ensure that you have the support and information that you need to decide what is right for you. You can find links to further advice through our guides.

If alleged sexual misconduct involves a student or staff member, an internal investigation will generally take place after the completion of a police investigation. However, it's important that we know at the earliest

opportunity so that we can support you through the investigation process and take any necessary precautionary measures.

Consent

Consent means that all those involved in the sexual activity **agree by choice and** have the freedom and capacity to make that choice. This includes ensuring consent to each act of a sexual nature. Sexual activity without consent is abuse and is a crime.

Choice is personal and autonomous, it can't be made by someone else.

Freedom is the absence of necessity coercion, force, persuasion or constraint.

Capacity is someone's ability to use and understand information in order to make their own choice and communicate their choice to someone else.

All three of these are needed for someone to be able to truly consent to sexual activity.

MYTHS

There are many myths and misconceptions about consent and sexual abuse, which may make it more difficult for victims of sexual violence to access the support that they need.

Saying NO - just because someone hasn't said 'no' it doesn't mean they have consented. It is often a trauma response for someone to stay silent, find they can't move and don't fight back. It is a myth that women play 'hard to get' or say 'no' when they mean 'yes'.

Withdrawing consent - someone can agree to sexual activity but later change their mind. They may agree to certain acts but not others and their choice, their decision should be respected.

Drinking or taking drugs – if someone is intoxicated, they may not be able to fully consent. You shouldn't have sex with someone who is unconscious or lacks capacity to truly understand what they're consenting to. Giving someone alcohol or drugs without their knowledge or consent (spiking) intending for them to become intoxicated is also illegal.

In a relationship – engaging in sexual activity without your partner's consent is an offence, a partner must also consent. Rape Crisis: 1 in 2 rapes against women are carried out by a partner or ex-partner.

Unconsciousness – it is not ok to engage in sexual activity with someone who is asleep, unconscious, incapacitated, the medication they are taking makes them drowsy or unwell or they are in and out of consciousness.

Men and non-binary people can also be victims – individuals of any gender and sexuality can be victims of sexual violence and abuse.

Deception – if someone is deceived about the nature of the sexual act then this can mean that they haven't consented. 'Stealthing', non-consensual condom removal during sex is rape.

