



## SAFEGUARDING & CHILD PROTECTION POLICY

**Policy owner:** Top Hat Theatre School

**Designated Safeguarding Lead (DSL):** Julie McKenna

**Applies to:** All students, staff, teachers, volunteers, contractors, visiting professionals, parents/carers and visitors

**Effective from:** September 2026

**Review date:** September 2027

**Previous review:** May 2025

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# 1. Our Commitment

Top Hat Theatre School is committed to safeguarding and promoting the welfare of all children and young people who attend or participate in our activities.

We recognise that safeguarding is everyone's responsibility.

Top Hat works with children and young people, predominantly aged between 3 and 18, and recognises that children may be vulnerable to abuse, neglect, exploitation, bullying, discrimination or other forms of harm.

We are committed to creating an environment in which children:

- feel safe;
- are listened to;
- are treated with dignity and respect;
- know who they can speak to if they are worried;
- are protected from harm;
- are encouraged to speak up about concerns;
- receive appropriate support when concerns arise.

Top Hat will always seek to maintain a **child-centred approach**, putting the child's welfare and best interests at the centre of safeguarding decisions.

Current *Keeping Children Safe in Education 2026* guidance emphasises that safeguarding is everyone's responsibility and that organisations should maintain a child-centred approach.

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## 2. Safeguarding Lead

The Designated Safeguarding Lead for Top Hat Theatre School is:

**Julie McKenna – Principal / Designated Safeguarding Lead**

The DSL has overall responsibility for coordinating safeguarding concerns within Top Hat and for ensuring that appropriate action is taken.

Where the DSL is unavailable, a designated senior member of staff will take responsibility for receiving and responding to safeguarding concerns until the DSL is available.

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## 3. Scope of this Policy

This policy applies to:

- all students;
- all teachers and employees;
- volunteers;
- visiting teachers and professionals;
- examiners and assessors;
- contractors working with or around children;
- parents and carers;
- visitors;
- anyone representing Top Hat Theatre School.

It applies to all Top Hat activities, including:

- classes;
  - rehearsals;
  - performances;
  - examinations;
  - competitions and festivals;
  - trips and visits;
  - workshops;
  - auditions;
  - social activities;
  - events;
  - activities taking place away from the Top Hat premises;
  - online activity connected with Top Hat.
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## 4. Types of Abuse and Safeguarding Concerns

Top Hat recognises that safeguarding concerns may take many forms. These may include:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse;
- neglect;
- domestic abuse;
- child sexual exploitation;
- criminal exploitation;
- online abuse;
- grooming;
- bullying and cyberbullying;
- discriminatory abuse;
- harassment;
- inappropriate or harmful sexual behaviour;
- abuse by another child;
- abuse by an adult;
- radicalisation or extremist influences;
- concerns relating to a child's mental or emotional wellbeing;
- concerns about a child being missing or absent from an activity;
- concerns about the behaviour of a member of staff or other adult.

A safeguarding concern does not need to involve an obvious injury or immediate danger.

A change in behaviour, presentation, attendance, communication or emotional wellbeing may also cause concern.

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## 5. Safeguarding is Everyone's Responsibility

Every member of staff and every adult working with children at Top Hat has a responsibility to act if they have a concern.

Staff should not assume that somebody else will report a concern.

If something does not feel right, it should be reported to the DSL.

Staff do not need to establish whether abuse has occurred before reporting a concern.

Their responsibility is to:

**Recognise → Respond → Record → Report.**

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## 6. Recognising Concerns

Staff should remain alert to possible indicators of abuse or neglect.

These may include:

- unexplained injuries;
- significant changes in behaviour;
- unusual fearfulness or anxiety;
- withdrawal;
- distress;
- changes in attendance;
- changes in relationships;
- inappropriate sexualised behaviour or language;
- disclosures by a child;
- concerns expressed by another child;
- concerning online behaviour;
- concerns raised by parents or other professionals.

An individual indicator does not necessarily mean that abuse has occurred.

However, concerns should always be recorded and passed to the DSL where appropriate.

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## 7. Responding to a Child Who Discloses a Concern

If a child tells a member of staff about abuse, neglect or another safeguarding concern, the adult should:

- remain calm;
- listen carefully;
- take the child seriously;
- allow the child to speak in their own words;
- avoid leading questions;
- avoid expressing disbelief;
- reassure the child that they have done the right thing by speaking;
- explain that the information cannot be kept secret;
- explain that the information will need to be passed to someone who can help;
- report the concern to the DSL as soon as possible;
- make a factual written record.

Staff should not:

- investigate the allegation themselves;
  - interrogate the child;
  - ask the child to repeat their account unnecessarily;
  - promise confidentiality;
  - confront an alleged perpetrator;
  - make assumptions about what has happened.
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## 8. Confidentiality and Information Sharing

Information relating to safeguarding concerns must be handled carefully.

Staff must not promise a child absolute confidentiality.

Where necessary to safeguard a child, information may need to be shared with appropriate professionals or agencies.

Information should be shared on a **need-to-know basis** and in accordance with applicable safeguarding and data-protection requirements.

Current government information-sharing guidance emphasises that appropriate information sharing is an important part of safeguarding children.

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## 9. Recording Safeguarding Concerns

Top Hat will maintain a clear system for recording safeguarding concerns and actions taken.

Records should be:

- factual;
- objective;
- dated;
- timed where appropriate;
- written as soon as reasonably possible;
- kept securely;
- separate from general student records where appropriate.

Records should distinguish between:

**What was observed**

**What was said**

**What was reported by another person**

**What action was taken**

Staff should avoid speculation or presenting an allegation as an established fact.

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## 10. Referral and Escalation

The DSL will consider the appropriate response to safeguarding concerns.

Depending on the circumstances, this may include:

- monitoring and support within Top Hat;
- discussion with parents/carers where appropriate;
- seeking advice from safeguarding professionals;
- referral to Children's Social Care;
- referral to the police;
- referral to another relevant agency.

Where there is an immediate risk of serious harm, emergency services should be contacted without delay.

Top Hat will cooperate with statutory safeguarding agencies where concerns require external intervention.

*Working Together to Safeguard Children 2026* applies across England to organisations and agencies involved in safeguarding children and emphasises coordinated multi-agency working.

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# 11. Allegations Concerning Staff or Other Adults

Top Hat recognises that safeguarding concerns may involve an adult working at or connected with the school.

Any allegation that an adult has:

- harmed a child;
- behaved in a way that may have harmed a child;
- possibly committed a criminal offence against a child;
- behaved towards a child in a way that indicates they may pose a risk of harm;

must be reported immediately to the DSL.

The DSL will consider whether the matter needs to be referred to the appropriate safeguarding authority or **Local Authority Designated Officer (LADO)**.

The adult concerned should not attempt to investigate the allegation themselves.

Where the allegation concerns the DSL, the matter should be referred to the appropriate external safeguarding authority rather than being investigated by the DSL.

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# 12. Low-Level Concerns About Adults

Top Hat recognises that safeguarding concerns do not always involve behaviour that immediately reaches the threshold for a formal allegation.

A **low-level concern** may include behaviour which is inconsistent with the school's professional expectations or which causes a safeguarding concern, even where it does not meet the threshold for referral.

Examples might include:

- unnecessary over-familiarity with a child;
- inappropriate communication;
- unnecessary private contact;
- inappropriate jokes or comments;
- inappropriate use of social media;
- unnecessary or poorly managed physical contact;
- repeated boundary issues.

Low-level concerns should be reported to the DSL.

They will be recorded, considered and managed proportionately.

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## 13. Safer Recruitment and DBS Checks

Top Hat is committed to safer recruitment practices.

Appropriate checks will be undertaken for staff and other individuals whose roles involve regulated activity with children, in accordance with current DBS eligibility requirements.

The **Disclosure and Barring Service (DBS)** replaced the former Criminal Records Bureau (CRB).

Current DBS guidance states that eligibility for an Enhanced DBS check with a Children's Barred List check depends upon whether the role involves regulated activity with children.

Top Hat will ensure that checks appropriate to the role are undertaken before an individual begins relevant work wherever required.

DBS checks are one part of safer recruitment and do not replace appropriate recruitment procedures, references, identity checks, safeguarding awareness and ongoing supervision.

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## 14. Staff Training

Staff and relevant volunteers will receive appropriate safeguarding information and training.

Staff will be expected to understand:

- their safeguarding responsibilities;
- how to recognise concerns;
- how to respond to disclosures;
- how to report concerns;
- recording requirements;
- professional boundaries;
- online safety;
- the school's safeguarding procedures.

Safeguarding information will be refreshed periodically and when significant guidance changes occur.

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## 15. Professional Boundaries

Adults working with students must maintain clear and professional boundaries.

Staff should:

- behave professionally;
- communicate appropriately;
- avoid favouritism;
- avoid inappropriate personal relationships with students;
- avoid unnecessary private communication;
- avoid sharing inappropriate personal information;
- maintain appropriate professional social-media boundaries;
- ensure one-to-one situations are appropriately managed.

Adults must never use their position of trust to manipulate, intimidate, exploit or otherwise harm a child.

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## 16. Physical Contact

Top Hat recognises that performing arts teaching may occasionally require appropriate physical contact.

This may arise during:

- dance technique;
- acrobatics;
- safety spotting;
- demonstrations;
- correction of movement;
- preventing an injury;
- first aid or emergency situations.

Physical contact must always be:

- necessary;
- appropriate to the activity;
- proportionate;
- professional;
- clearly related to teaching, safety or care.

Where practicable, the teacher should explain the reason for physical contact and seek the student's agreement.

Where an alternative method of teaching or correction is reasonably available, it should be considered.

Physical contact must never be sexual, inappropriate, unnecessary or used as a form of punishment.

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## 17. One-to-One Situations

Top Hat will seek to avoid unnecessary situations where an adult is alone and unobserved with a child.

Where one-to-one teaching, coaching, support or discussion is necessary:

- the situation should take place in an appropriate environment;
- doors should remain open where practicable;
- visibility should be maintained where possible;
- another member of staff should be aware where appropriate;
- communication should remain professional.

Confidential conversations with students should be handled sensitively while maintaining appropriate safeguarding boundaries.

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## 18. Photography, Filming and Social Media

Photography and filming of students must be undertaken in accordance with Top Hat's consent and data-protection arrangements.

Staff must not:

- take inappropriate photographs or videos of students;
- use personal devices inappropriately to photograph children;
- share images of students through personal social-media accounts;
- communicate privately with students through personal social-media accounts.

Any approved photography or filming must have an appropriate purpose and be managed in accordance with Top Hat's procedures.

Parents and carers will be informed about relevant photography and filming arrangements.

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## 19. Online Safety

Top Hat recognises that safeguarding risks can occur online as well as in person.

Concerns may include:

- cyberbullying;
- inappropriate messaging;
- grooming;
- inappropriate images;
- online harassment;
- harmful content;
- inappropriate contact between adults and children;
- misuse of social media.

Any online safeguarding concern connected with a Top Hat student or activity should be reported to the DSL.

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## 20. Good Practice

Adults working with children at Top Hat should:

- work in an open and observable environment;
  - treat every child with dignity and respect;
  - maintain appropriate professional boundaries;
  - put the child's welfare first;
  - communicate positively;
  - provide clear expectations;
  - encourage children to speak up;
  - maintain appropriate supervision;
  - recognise and report concerns;
  - record concerns accurately;
  - challenge inappropriate behaviour appropriately.
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## 21. Practices to Avoid

Adults should avoid:

- unnecessary one-to-one situations;
  - unnecessary physical contact;
  - shouting at or humiliating children;
  - favouritism;
  - inappropriate jokes or comments;
  - discriminatory language;
  - sharing inappropriate personal information;
  - unnecessary personal contact through social media;
  - engaging in arguments with children;
  - using children to resolve adult disputes;
  - promising secrecy;
  - discussing confidential information with other parents or students.
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## 22. Practices That Are Never Acceptable

Adults working with children must never:

- engage in sexualised behaviour with a child;
  - make sexual or suggestive comments to a child;
  - engage in inappropriate touching;
  - use physical punishment;
  - deliberately humiliate or degrade a child;
  - threaten or intimidate a child;
  - deliberately frighten a child as a means of control;
  - exploit a position of trust;
  - encourage secrecy around inappropriate relationships or behaviour;
  - ignore or deliberately fail to report a safeguarding concern.
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## 23. Accidental Incidents and Professional Concerns

Certain incidents must be reported to the DSL even where no harm was intended.

This includes where:

- a member of staff accidentally injures a child;
- inappropriate physical contact occurs accidentally;
- a child misunderstands an adult's actions or communication;
- a child becomes unusually distressed;
- a staff member becomes concerned about a child's welfare;
- a child makes an allegation or disclosure;
- a staff member becomes concerned about their own behaviour or a colleague's behaviour.

The purpose of recording such incidents is **not to assume wrongdoing**, but to ensure transparency, appropriate safeguarding oversight and an accurate record.

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## 24. Bullying and Peer-on-Peer Abuse

Top Hat recognises that children can harm other children.

This may include:

- bullying;
- cyberbullying;
- intimidation;
- harassment;
- discriminatory behaviour;
- physical aggression;
- sexual harassment;
- harmful sexual behaviour;
- exclusion;
- coercive or controlling behaviour.

Concerns will be taken seriously regardless of who is alleged to be responsible.

Where appropriate, Top Hat will consider the behaviour of **all children involved**, rather than automatically labelling one child as a victim and another as a perpetrator before the facts have been established.

The Anti-Bullying Policy should be read alongside this policy.

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## 25. Equality and Safeguarding

Top Hat is committed to safeguarding every child regardless of:

- sex;
- age;
- race;
- disability;
- religion or belief;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- marriage or civil partnership;
- family background;
- any other protected characteristic.

Discrimination, harassment and victimisation will not be tolerated.

The Equality, Diversity & Equal Opportunities Policy should be read alongside this policy.

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## 26. Missing Children and Unauthorised Collection

Top Hat will have appropriate arrangements for children attending classes and activities.

Where a child:

- cannot be located;
- leaves an activity without permission;
- is not collected as expected;
- is collected by someone not authorised by the parent/carer;

staff should follow the school's appropriate procedures and inform the DSL/senior member of staff.

Where there is concern that a child may be at risk, appropriate safeguarding or emergency services will be contacted.

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## 27. Trips, Performances and External Activities

Safeguarding arrangements apply equally when students are:

- attending festivals;
- performing in theatres;
- travelling to performances;
- attending competitions;
- participating in trips;
- attending external workshops;
- staying away from home as part of a Top Hat activity.

Appropriate supervision, risk assessment, emergency contacts and safeguarding arrangements will be considered for each activity.

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## 28. Children Speaking Up

Top Hat wants children to feel able to speak to an adult if something is worrying them.

Staff should create an environment where children feel:

- listened to;
- believed;
- respected;
- safe to raise concerns.

Children should not be made to feel responsible for resolving safeguarding concerns themselves.

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## 29. Parents and Carers

Parents and carers are encouraged to raise safeguarding concerns with Top Hat.

Parents/carers should:

- report concerns promptly;
- provide relevant factual information;
- cooperate with safeguarding procedures;
- avoid confronting another child;
- avoid investigating allegations themselves;
- respect confidentiality.

Top Hat may not be able to disclose confidential information about another child or family, including details of safeguarding action taken.

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## 30. Record Keeping

Safeguarding records will be:

- factual;
- accurate;
- dated;
- stored securely;
- accessible only to appropriate individuals;
- retained in accordance with applicable requirements.

The DSL will maintain oversight of safeguarding records and actions.

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## 31. Whistleblowing and Raising Concerns About Safeguarding Practice

Any staff member who has a safeguarding concern about another member of staff should report it through the appropriate safeguarding procedure.

Staff should not feel prevented from raising concerns because the person involved is senior to them.

Where an individual believes that a safeguarding concern has not been appropriately addressed, they should escalate the matter to the appropriate external safeguarding authority.

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## 32. Emergency Safeguarding

If there is an immediate risk of serious harm to a child, staff should contact the emergency services where necessary and inform the DSL as soon as practicable.

Safeguarding concerns should never be delayed simply because the DSL is unavailable.

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## 33. Policy and Guidance

This policy is informed by current safeguarding guidance applicable in England, including:

- **Keeping Children Safe in Education 2026**
- **Working Together to Safeguard Children 2026**
- **Information Sharing to Safeguard Children and Young People**
- relevant DBS guidance
- relevant safeguarding legislation and local safeguarding arrangements.

The current *Keeping Children Safe in Education 2026* came into force on 1 September 2026.

*Working Together to Safeguard Children 2026* was updated in March 2026 and applies across England to organisations and agencies involved in safeguarding children.

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## 34. Related Policies

This policy should be read alongside Top Hat Theatre School's:

- Anti-Bullying Policy;
- Equality, Diversity & Equal Opportunities Policy;
- Health & Safety Policy;
- Fire Risk Assessment;
- Behaviour Policy;
- Parent/Carer Code of Conduct;
- Photography and Filming Policy;
- Data Protection/Privacy Policy;
- Complaints Policy;

- relevant risk assessments.
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## 35. Policy Review

This policy will be reviewed **at least annually** and sooner where:

- safeguarding guidance changes;
- legislation changes;
- there is a significant safeguarding incident;
- a new safeguarding risk is identified;
- Top Hat's activities or premises change;
- lessons are identified from an incident or complaint.

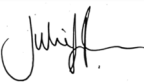
**Next review:** September 2027

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## Declaration

**Designated Safeguarding Lead:** Julie McKenna

**Position:** Principal / Proprietor

**Signature:** 

**Name/Role:** Julie McKenna Company Director

**Date:** 15.9.2026

**Next review:** September 2027