



Guidelines, Policies and Procedures

Revised January 2021

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The Purpose of this Document

The national care standards for childcare cover services for children and young people up to the age of 16 years are to be regulated under the Regulation of Care (Scotland) Act 2001 ('the Act') This Act applies to services in the public, private and voluntary sectors, and in domestic or non-domestic premises which provide services for over two hours a day and for six days or more each year. This includes Triple Act Theatre & Arts and it's educational and outreach programme.

This Guidelines, Procedures and Policies document allows everyone from participant to parent/guardian the freedom of information on our policies and principles. Triple Act Theatre & Arts gathered its information and policies from a number of sources, Getting It Right For Every Child (GIRFEC), National Guidance for Child Protection in Scotland, United Nations Convention on Rights of the Child (UNCRC). Children in Scotland – Creative Scotland. Ten steps to safeguard children in sport – Sport Scotland and Community Groups Guidance – North Ayrshire Child Protection Committee. Triple Act Theatre & Arts has been involved with North Ayrshire Child Protection Committee for training opportunities for staff

Code of Practice

Staff and volunteers should never:

- Engage in inappropriate rough, physical and sexually provocative games, including horseplay
- Allow or engage in inappropriate touching of any form
- Deter young people from making allegations through a fear of not being believed
- Allow young people or other staff and volunteers to use inappropriate language (Obviously, there will be situations within the work undertaken during workshops and productions when the subject matter requires strong language -Leaders should prepare carefully for this.)
- Make sexually suggestive comments about or to a young person even in fun
- Do things of personal nature for young people that they can do themselves
- Jump to conclusions about others without checking facts
- Show favouritism to any individuals
- Rely on just your good name to protect you
- Believe it could never happen to you

Staff and volunteers should always:

- Treat everyone with respect
- Respect a young person's right to personal privacy
- Take seriously any allegations a young person makes, ensuring that the appropriate people alerted (see below) that the incident is recorded
- Provide access for young people to talk to others about any concerns they may have
- Remember that someone might misinterpret your actions, no matter how intentioned
- Plan activities so that at least one other member of staff or volunteer is present, or is at least within sight or hearing of the activity
- Recognise that particular caution is required even in sensitive moments of counselling, such as when dealing with bullying, bereavement or abuse

Child Protection Policy

Guidelines for Drama, Workshop and Performance Leaders (Voluntary and Paid)

Triple Act Theatre & Arts is fully committed to safeguarding the welfare of all children and young people by protecting them from physical, sexual and emotional harm. Volunteers and staff should, at all times, show respect and understanding of young people, and their safety and welfare, and conduct themselves in a way that reflects our principles. No activity should be entered into that is potentially harmful to young people, and good practice should be adhered to at all times.

Principles

You can reduce likely situations for the abuse of participants and help protect yourself from false accusations by making sure that everyone is aware that, as a general rule, you should not:

- Spend time alone with a young person away from others
- Contact young people out with the activity or the project, where it constitutes the inappropriate use of contacts made through the group
- Take young people alone in a car on journeys, however short
- Take a young person to your home

When occasions arise where it is unavoidable that these things happen, then they should only occur with the full knowledge of your line manager, senior worker or the young person's parents.

Reporting Concerns or Worries

Concerned about a child?

Where any member of our organisation has concerns about the welfare or a safety of a child, these should be discussed with the Designated Child Protection Officer.

The Designated Child Protection Officer (DCPO) is: KATE STEVENS / **TEL 07979 8000970**

The DCPO will determine the best course of action and how best to ensure the safety and welfare of the child.

If the DCPO is not available or a staff member disagrees with the DCPO of the organisation staff are entitled to follow these steps and inform the DCPO of their actions at the earliest opportunity.

This may be:

- Sharing the concern with the child's named person such as health visitor.
- Sharing their concern with Social Services via Reception Services.

Service Access Teams

Irvine: 01294 310300

Kilbirnie: 01505 684551

3Towns: 01294 605261

Arran: 01770 600742

In the evening (after 5 pm) the coordinator may share their concerns with Ayrshire Out of Hours Service. **Ayrshire Out of Hours Service 0800 328 7758**

Where immediacy is a factor informing Police Scotland should be contacted:

Police Scotland 101

What Should I Say?

Clearly, state that you have a concern about a child. It is beneficial when making contact if you have:

- The child's name
- The child's date of birth
- The child's address.
- The nature of your concern.
- The current location of the child.
- Your name
- Your contact details.

What Happens Next?

Unless a child is in immediate danger, social services will always make some enquiries before deciding what action to take. They will check with other people who know the child such as their teacher and health visitor to see if they also have concerns. They will look to see if anyone else has shared a concern about the child. By doing this, they begin to build an overall picture of this child and their circumstances. **The information you share can make a crucial difference to this picture.**

Depending on the picture that emerges for this child, the family will be offered different kinds of support to ensure the child is safe and well looked after. The priority for everyone is making sure the child is safe. Everyone can play a part in this. Please play your part by telling someone if you have any concerns about a child.

Disclosure

If a child discloses abuse to a member of this organisation they should:

- Remain open to the disclosure: do not appear shocked or disbelieving (even if you feel it).
- Allow the child to feel secure and give them time.
- Never promise them that you will keep what they say secret but do reassure them that will act on their behalf to ensure only those who need to know are told.
- Only speak of the allegation to those to whom you must refer.
- Only discuss this with those who need to know to safeguard the child.
- Confidentiality is still essential except for the line of referral.
- Record what that you have been told or observed and/using the child's own words (do not interpret what they have said).
- Remember overall that the child's welfare is paramount
- Report the details of the disclosure to the Child Protection Officer as soon as is practically possible.

Promoting & Safeguarding the Welfare of Children

To help safeguard and promote the welfare of children members of the organisation will require a basic level of knowledge regarding what may constitute harm to children.

The National Guidance for Child Protection in Scotland 2014 provides comprehensive information about promoting and safeguarding the welfare of children. Members of our organisation should be aware of the forms which abuse may take and some of the possible signs and symptoms.

Physical Abuse

Physical abuse is the causing of physical harm to a child or young person. Physical abuse may occur from an actual attack to a child or an adult's willful failure to protect them from injury or suffering. Accompanied by neglect, physical abuse is the most common form of maltreatment of children and is the most common cause of child death from abuse.

- A child may be hit, punched, kicked or bitten
- Shaking a child is extremely dangerous and potentially fatal, babies are particularly at risk
- A child may be burned or deliberately scalded
- A child may be squeezed with violence or attempted suffocation
- Deliberate poisoning (household substances, alcohol, drugs or medicines)
- Shut in cupboards / Confined in small places
- Tied or strapped down

Signs that should concern you:

- Unexplained Injuries (bruising, bruised eyes, fractured or broken bones, burn or bite marks)
- Perplexing illnesses
- Continuous "accidents."
- An unlikely (or no) explanation for an injury
- A continual pattern of accidents or injuries
- A child may be reluctant to change for physical activities at school etc.

Behavioural Indicators Include:

- A child who is very reluctant to return home
- A child who appears withdrawn / in pain or discomfort
- A child who is resistant to going home with one family member

- Self-harm, self-destructiveness
- Persistent aggression and violent play

Emotional Abuse

All children and young people who are abused are affected emotionally, and all types of child abuse are harmful. Emotional abuse is a persistent emotional neglect or ill treatment that has severe and persistent adverse effects on a child's emotional development.

- Children may be verbally abused – told they are stupid, useless, ugly or should never have been born
- Subjected to continuous criticism or faced with unrealistically high expectations
- Their interests and achievements may be ridiculed or compared unfavourably
- Affection given by parents is dependent on the child's behaviour or achievements
- Children may be overprotected to an unrealistic extent
- Communication with the child may be distorted so that the adult uses his/her maturity inappropriately to make the child feel guilty
- Children may have their toys withdrawn, denied or sold by parents/carers as a punishment
- Children may be emotionally damaged by experiences of domestic abuse

Signs that should concern you about a child or young person:

- Child is developmentally delayed
- Child indicates through the use of words and body language that they think they are worthless, stupid or unattractive
- Children expect blame and punishment (or blame themselves)
- Children may harm themselves
- Children may find it difficult to make friends and see themselves as not being likeable
- Children may be mistrusting of adults
- Low self-esteem
- Sudden speech and language difficulties
- Significant decline in concentration
- Head banging or rocking
- Compulsive stealing (from parents/carers/teachers)

- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Often difficult to assess in practice, some recent child death inquiry reports have highlighted the consequences of neglect on children and this, alongside an apparent increase in neglected children has brought about a renewed focus on neglect.

- Inadequate food – leading to children and young people being malnourished
- Inadequate clothing (for time of year; shoes too tight; ill-fitting clothing; dirty and unwashed clothing)
- Neglect of children's basic physical needs (dirty, smelly, unkempt)
- Leaving young children unattended.

Signs that should concern you:

- Child / young person may be too thin
- Child / young person may be tired and lethargic
- Child / young person may arrive at your workplace desperate for food/constantly hungry, eating large amounts
- Child / young person may be regularly dressed inappropriately for the weather
- Clothes may be dirty, smelly or soiled
- Parents may not bring the child on a regular basis
- Frequent lateness and/or unexplained non-attendance at school
- Child / young person may have untreated medical conditions or infections
- Low self-esteem
- Ask: are all the children in the family neglected or is it only one child/ young person?

Sexual Abuse

Sexual abuse is any act that involves the child in any activity for the sexual gratification of another person, whether or not it is claimed the child consented or assented. It can include:

- Penetrative or non-penetrative acts
- Sexual fondling
- Masturbation
- Sexual Exhibitionism
- Non-contact activities, such as watching pornographic material
- Pornographic Images
- Grooming (including grooming via the internet)

Signs that should concern you:

As with any kind of child abuse, there is no definite list of signs of sexual abuse. The following are not in themselves absolute evidence of sexual abuse. Concerns must be placed within an understanding of the normal range of children's development:

- Highly sexualised behaviour, rather than affectionate physical contact
- Abused children may express their worries and experiences through play
- Sexually explicit paintings or drawings
- Sexual knowledge or curiosity (unlikely for their age)
- Children can tell you unhappy secrets or games that they are uneasy about
- Regression in development
- Self-harm
- A child not wishing to go with a certain adult or be looked after by a certain person (i.e. Babysitter)

A note about Perpetrators

- Abusers may be extremely frightening and threaten to hurt the child or someone they care about
- Abusers may claim that nobody will believe the child if they tell (and may threaten the child with this)
- Some abusers will attempt to bribe children with presents, treats or money
- Some abusers work to convince children that what they are doing is a normal and acceptable activity within the family or between friends
- Abusers come from all classes, professions, racial and religious backgrounds and can be anyone – family members, neighbours, friends, doctors, community group helpers, even professional colleagues
- Most known abusers are men, but some women sexually abuse their own or other children
- Young people also abuse children. About one-third of reported cases involve young people

Protecting Children within Triple Act Theatre & Arts

Designated Child Protection Officer

The role of the Designated Child Protection Officer is to implement the policy and procedures within Triple Act Theatre & Arts. It is their role to make everyone aware of these procedures and provide training to all staff and volunteers. It is the responsibility of all staff to safeguard the protection of children. It is the duty and responsibility of the Child Protection Officer to report all concerns to the named person of a child (Midwife/Health Visitor/ Head teacher) and in an immediacy to contact Social Services or Police Scotland.

Disclosure

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'Disclosure' is the term for what, in the past has been called police checking or screening. All Staff (Full time, part time, freelancers, volunteers, etc.) shall obtain a certificate of extended disclosure and be registered with via the PVG Scheme.

Staff PVG Membership Numbers are available on request to parents of participants involved.

Staff / Volunteers

All Staff / Volunteers working for Triple Act Theatre & Arts will be required to have a current PVG and provide 2 References. All staff must complete and sign the Self-Learning Pack that is provided by North Ayrshire Child Protection Committee and expect staff to attend further information training in Child Protection if needed.

Equal Opportunities Policy

General Statement

Triple Act Theatre & Arts is committed to combating discrimination through the promotion of equal opportunities in respect of:

- Provision of services
- Working practices of the organisation
- Employment and Training

Triple Act Theatre & Arts will try to ensure that in respect of the above, no young person shall receive less favourable treatment than others because of her or his:

- Gender, including gender reassignment
- Religious belief or political opinion
- Race (including colour or ethnic origins)
- Nationality
- Disability
- Sexual orientation
- Educational background

Triple Act Theatre & Arts will try to ensure that in respect of the above, no contracted person, volunteer or another person involved in Triple Act Theatre & Arts shall receive less favourable treatment than others because of her or his:

- Gender, including gender reassignment
- Marital or civil partnership status
- Having or not having dependents
- Religious belief or political opinion
- Race (including colour or ethnic origins)
- Nationality
- Disability
- Sexual orientation
- Age
- Trade Union activity
- Educational background

Practices and Commitments

To ensure that Triple Act Theatre & Arts services are accessible to all, Triple Act Theatre & Arts will follow these principles:

- Promoting a good and harmonious working environment in which all persons are treated with respect.
- Preventing occurrences of unlawful direct and indirect discrimination harassment and victimisation.
- Complying with our own equal opportunities policy and associated policies.
- Publicity materials, publications, advertisements, events, workshops and performances shall avoid language which presents a stereotyped, offensive or detrimental view of any group or individual's background on any of the above grounds. However, performances and workshops will necessarily need to present such language and views when tackling hard hitting issues. It should be made clear by Leaders during workshops and performances the difference.
- Triple Act will make its services available to disabled people, including wheelchair users – by using premises that are wheelchair accessible for its activities whenever possible. Triple Act will discuss with parents, carers and young people how it can try to accommodate specific needs.
- Triple Act does not allow its publicity, events or facilities to be used for the expressions of views in conflict with this policy.
- Breaches of equal opportunities policy will be viewed as misconduct which could lead to disciplinary proceedings including removal from activities or termination of contracts.
- Triple Act values diversity and recognises the wealth of benefits diversity can bring to the organisation.

Implementation

The Trustees have overall collective responsibility for the effective implementation of this policy. All contracted employees and volunteers have individual responsibility for implementation of this policy.

To implement this policy we shall:

- Ensure the policy is communicated to all employees, volunteers, board members, job applicants and relevant others (such as freelance artists).
- Provide /source training and guidance as appropriate communication practices.
- Obtain commitments from other persons or organisation such as subcontractors or agencies that they too will comply with the policy in their dealings with our organisation.
- Ensure that adequate resources are made available to meet the policy's objectives.

Complaints

Any party who believes that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the complaints procedure detailed in this pack. All complaints will be dealt with seriously, promptly and confidentially.

In addition to our internal procedures, employees have the right to a tribunal will usually be expected to raise their complaint under our internal grievance procedure in the first instance.

Health and Safety

As part of planning Triple Act Theatre & Arts promotes the importance of health and safety awareness throughout the youth theatre movement. Having both a policy and procedures for Health and Safety helps to ensure that everyone involved with Triple Act Theatre & Arts (participants, staff, volunteers, audiences, etc.) are made to feel safe and protected from accident, injury or illness.

Introduction

A serious and thorough approach to health and safety matters should be a key feature of every youth theatre, large or small. It need not be daunting. This is said because much in the field of health and safety seems complex and meant for larger enterprises than most youth theatres. However, it is essential to establish and follow safe practice within all activities. In particular, you should exercise diligence and common sense at all times. Good health and safety policy and practice are not optional extras. Youth theatre activities can be hazardous. But they do not, generally, pose too many high levels of health and safety risk. In fact, most risks that are posed can be removed or adequately controlled with a careful approach.

Risk assessments - what is entailed?

All of the regulations about health and safety emphasise the importance of making 'risk assessments'. Linked to this is the prior need to identify hazards.

Here are the definitions:

Hazard: Anything that has the potential to cause injury or harm.

Risk: The likelihood, great or small, of the potential for harm being realised and causing an accident or incident.

Making a 'risk assessment' has no fixed rules but the accepted advice is to adopt the procedure as follows:

- Identify the hazards within set activities (Activity)
- Assess the risks posed by the hazards (Risk)
- Decide - and act on - the 'control measures' to manage the risks (Action)
- Implement the control measures and monitor their effectiveness (Assign Responsibility)

At the start of each session/production, the Leader/Production Manager will remind participants of main safety points. This will depend on the circumstances, location, etc. but could include some of the items below.

NOTE: Although it is useful to have a person with the overall responsibility for health, good health and safety practice is the responsibility of everyone.

A survey of the health and safety literature, with youth theatre in mind, helps to identify certain high-level risks with potentially serious consequences.

- Fire hazards
- Sitting of exits
- Slips and trips
- Handling props and scenery
- Collisions during active sessions
- Hygiene (e.g. multiple uses of costumes, make up, and activities involving bare feet)
- Availability of medical information about participants
- Safety in connection with demanding physical activities

Specific risks related to electrical equipment, use of ladders, handling of heavy equipment, special effects, etc.

Consideration should also be given to the safety of the audience.

First aid training

It is recommended by Triple Act Theatre & Arts that regular session leaders undertake a course of first aid training. This should be refreshed and updated approximately every three years. Triple Act Theatre & Arts will try to make this training available to leaders.

Accidents

Under the Health and Safety Act 1974 an accident book must be kept, and all Accidents entered into it as they occur. Organisations with less than five employees are not obliged to maintain an accident book.

An Imperfect World

It is an imperfect world, and occasionally, accidents do happen. However, it is the job of all responsible organisations to be health and safety conscious and to show that they have taken every action 'as far as is reasonably practical' to manage and minimise the risks.

Anti-Bullying Policy

POLICY STATEMENT

Triple Act Theatre & Arts acknowledges that bullying behaviour is unacceptable and will not be tolerated. We endeavour to ensure that a secure environment is provided for every young person who wishes to participate in the performing arts. We acknowledge that bullying can take place and may need to be addressed amongst any combination of persons that are present at Triple Act Theatre & Arts, regardless of their role: participant, volunteer or staff. If an activity uses a regular venue, it might be useful to have BYT's Anti-Bullying Policy displayed in its venue with a contact name and number for confidential support.

DEFINITION OF BULLYING

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional - being deliberately unfriendly, excluding, tormenting (e.g. hiding possessions, using threatening gestures).
- Physical - pushing, hitting, kicking or any use of violence.
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focusing on the issue of sexuality
- Religious - because of or focusing on the issue of faith
- Verbal – name-calling, sarcasm, spreading rumours
- Cyber - all areas of internet, such as email and internet chat room misuse, mobile phone threats by text messaging and calls misuse of associated technology, i.e. camera and video facilities.

IMPLEMENTATION

It is the responsibility of contracted employees and volunteers to ensure the implementation of the Anti-Bullying Policy to minimise occurrences of bullying. Leaders and Volunteers should encourage all participants to report instances of bullying happening to them or which they see happening to others. Leaders will use their experience and discretion to establish the seriousness of the allegation but are themselves encouraged to report the allegation to their Child Protection Coordinator to discuss possible action.

This might include a discussion with individuals, whole group involvement of parents, etc. and is likely to be initiated by the Leader. In more serious cases, involvement of the others may be required, especially if sanctions are required where bullying has been established, a written record will be made and sent to the Child Protection Officer.

Triple Act Theatre & Arts will provide appropriate awareness raising and training to all relevant staff and volunteers to reinforce this policy and to provide skills and techniques to counter bullying behaviour.

All staff and volunteers should be informed of what to do when an incident of bullying is reported.

PROCEDURES

1. Incidents should be reported to Leaders and subsequently to the Child Protection Officer
2. Incidents will be recorded by Leaders.
3. In serious cases, parents should be informed and will be asked to visit to discuss the problem.
4. In extreme cases, if necessary and appropriate, particularly 'cyber-bullying', police will be consulted
5. The bullying behaviour or threats of bullying must be investigated, and the bullying stopped quickly
6. An attempt will be made to help the bully (bullies) change their behaviour

OUTCOMES

1. The bully (bullies) may be asked to apologise genuinely, and other consequences may take place
2. In very serious cases, suspension or exclusion could be considered
3. If possible, the participants will be reconciled
4. After the incident(s) have been investigated and dealt with, each case will be monitored in striving to ensure repeated bullying does not take place

MONITORING & RECORD KEEPING

Although every effort will be made to minimise the recording, it is important that a record is kept.

- All incidents should be written up within 24 hours.
- Reports should be signed by the staff member/volunteer, with the name printed and designation.
- Reports and records should be passed to the Child Protection Coordinator who in turn will take responsibility for the safe storage and processing of this information.
- All information gathered should be treated with strict confidentiality

EVALUATION

Records of incidents are kept and used to inform future practice. Spot checks and occasional surveys are also used. Evaluation and review will ensure that the Youth Theatre remains responsible for changing needs while striving to protect young people from bullying.

WHAT WE INTEND TO ACHIEVE

Our Anti-Bullying Policy aims to achieve a reduction in bullying due to:

- The vigilance and responsiveness of staff and volunteers to bullying behaviour
- Acknowledgement by young people that bullying will be tackled
- Raised awareness about bullying and the forms it can take
- A greater proportion of young people informing an adult if they are being bullied
- The involvement of staff, volunteers, parents and young people in implementing the Anti-Bullying Policy

ALL STAFF AND VOULENTEERS WHO SUSPECT BULLYING MUST FILL OUT A BULLYING INCIDENT REPORT SHEET AND PASS THEM TO THE CHILD PROTECTION COORDINATOR.

Guidelines on the appropriate adult to young person ratios for workshops/performances

Children aged under 8 years

Triple Act recommends that for regular early years activity you have a ratio of 1 adult to 10 young people with a maximum group size of 30. It is good practice that a minimum of 2 adults are present at all times regardless of the group size. Triple Act prefers to have 2 adults to a maximum group size of 20 and 3 adults for groups with 21-30 participants. Sometimes this is not always possible due to staff illness etc.. However, it may be appropriate to have a parent or other volunteer helper 'on call'.

Children and young people aged eight and over

There is no actual legislation on this for young people over the age of 8. Children aged 8 to 11 years NAYT recommends that for regular youth theatre activity (i.e., rehearsal or workshop) you have a ratio of 1 adult to 12 children and a maximum group size of 30. If you are taking children aged 8 to 11 on an outing, trip or any environment which is not where their usual activity takes place (excluding residential), the ratio should be 1 adult to 6 children.

Young people aged 11 to 18 years

Triple Act recommends that for regular youth theatre activity you have a ratio of 1 adult to 15 young people with a maximum group size of 30. It is good practice that a minimum of 2 adults are present at all times regardless of the group size. Triple Act prefers to have 2 adults to a maximum group size of 30. Sometimes this is not always possible due to staff illness etc.. However, it may be appropriate to have a parent or other volunteer helper 'on call'.

Guidelines on Photographs/Video of Children & young people

Photographs and video play an important part, not only in promotion and advertising of Triple Act events but also as part of many productions and workshops. However, some safeguards are required.

When a young person makes an application to participate in a Triple Act activity, they (or their parent/carer if the young person is under 18) will be asked to give permission for the use of photographs or video for Triple Act purposes. Any young person for whom permission is not given will be noted in the appropriate register. The workshop or project leader must check this register before any photographs are taken and ensure that that young person is not photographed.

Individual young people should not be named in photographs.

Photographs should be used only for Triple Act purposes. When photographs are released to third parties, it must be made clear that they should be used only for the promotion of Triple Act activities and not passed to others without permission.

Where possible, the acknowledgement will be given to the photographer.

To reduce the risk of inappropriate use, only use images of children in suitable dress. With regard to the actual content it is difficult to specify exactly what is appropriate given the wide diversity of activities offered by organisations. However there are clearly some situations where the risk of potential misuse is much greater than for others. With these situations, the content of the photograph should focus on the activity not on a particular child and should avoid full face and body shots.

Triple Act Child Protection Procedures and Guidance should be followed at all times.

Guidelines for use of non-Triple Act photographers at events.

Provide a clear brief about what is considered appropriate in terms of content and behaviour.

The photographer should be accompanied by a member of Triple Act staff at all times.
Do not allow unsupervised access to children or one-to-one photo sessions at events.

If parents or other spectators are intending to photograph or video at an organised event they should also be made aware of your expectations. This should only be allowed if permission has been received for all participants.

Consent for film/video, audio & photography with notice of copyright.

I hereby grant Triple Act Theatre & Arts a licence to use material(s) contributed by the participants for marketing purposes via web-based and other digital/print methods. I understand that it is the responsibility of myself or Parent/Carer for participants under the age of 18 to secure the relevant permissions and/or licences which allow us to grant this licence. Triple Act Theatre & Arts will not be held responsible for any individual's failure to comply with its OPT OUT POLICY.

Triple Act Theatre & Arts has an OPT IN POLICY to consent to participate in Video, Audio and Photography. Please either give consent through our online booking platform or by completing the form attached in this pack and bringing it with you to one of our classes.

Data Protection – Good Practice Guidelines

The General Data Protection Regulation 2016 replaces the EU Data Protection Directive of 1995. Its purpose is to protect the 'rights and freedoms' of natural persons and to ensure that personal data is not processed without their knowledge and wherever possible, that is it processed with their consent.

Triple Act Theatre & Arts is a Charity Registered in Scotland, committed to protecting the rights and freedoms of data subjects and safely and securely processing data in accordance with all of our legal obligations. We are fully aware of the confidential nature of some of the data we hold, and as such we have a detailed policy in place, to ensure our staff and volunteers understand the rules governing their use of personal data, a copy of which can be provided at your request.

Information held by Triple Act follows the principles enumerated in the EU General Data Protection Regulation and will make every effort possible to comply with these principles.

- **Lawful, fair and transparent** - Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.
- **Limited for its purpose** - Data can only be collected for a specific purpose.
- **Data minimisation** - Any data collected must be necessary and not excessive for its purpose.
- **Accurate** - The data we hold must be accurate and kept up to date.
- **Retention** - We cannot store data longer than necessary.
- **Integrity and confidentiality** - The data we hold must be kept safe and secure.

All information held by Triple Act is strictly for its own use. Information will not be shared with any third party without prior consent of the data subject. Everyone in the organisation has a duty to protect the privacy of information relating to individuals.

Information about individuals associated with Triple Act is held with the right of subject access, allowing any individual access to the information held about them.

Security Measures

- Keep files containing personal and confidential information locked away.
- Don't allow unauthorised people to be left alone with personal data.
- Do not leave any personal data in plain view in a public or easily accessible place.
- Encrypt and password-protect e-mail and database facilities.
- Keep track of any personal data that is taken away from the office through a booking in and out the system.
- When deleting electronic files, ensure that they have been completely removed from your computer (i.e., empty recycle bin).
- Change passwords regularly.
- Do not pass personal data to a third party, without express permission from the subject of the information.

Protecting information from loss or damage

- Keep full backups of any electronic data.
- Protect manual files and electronic backups from the fire.
- Be aware of the potential risks from computer viruses.
- Don't take documents away from the office unless it is a secure copy.
- Ensure you do not delete any files that may require keeping.

GDPR – Subject access request

The GDPR comes into effect on the 25th of May 2018. We have updated our privacy policy in line with the new legislation of where your data is kept and stored.

For Triple Act we store your information via Eventbrite when signing up to classes, we ask questions so that if there is an emergency, we have your permissions to contact emergency services ensuring the safekeeping of all those that take part.

If you require a subject access request, please contact us firstly via telephone on **01294 475648**. We then have 30 days by receiving your query of providing you with the information you requested. Triple Act has the right to refuse a request, if so, we will tell you why and that you also have the right to complain to the supervisory authority and to a judicial remedy.

Further information can be found on our website:

<https://www.tripleact.co.uk/privacy-policy/>

Complaints Policy & Procedures

Triple Act strives for high standards in all aspects of its work, and through the policies and procedures in place, aims to be fair at all times and provide satisfaction to anyone using the services it provides. The staff and volunteers who represent the organisation are committed to high standards of conduct and service at all times.

Should complaints arise, it is Triple Act's policy to deal with these complaints quickly and efficiently. Complaints may be made verbally or in writing, and the procedures are as follows:

Enquiries / Concerns

If you have any questions or minor concerns, please email info@tripleact.co.uk or call 01294 475648. Where we will take details of the complaint, identifying both the nature of the complaint and, if appropriate, the individual against whom the complaint is being made. Any complaint against an individual will be dealt with in a confidential manner. Should the complainant not want to speak to a member of staff available, they can leave their contact details, and they will be contacted as soon as possible.

Written Complaint

The complainant should write as much details as you can. The more information provided the quicker the response and attempt to rectify the situation.

There are two ways in which a written complaint can be received to us:

- Handed to us in person
- OR send to our Registered Address:

Triple Act Theatre & Arts, The Michael Lynch Centre, 71 Princes Street,
Ardrossan, North Ayrshire, KA22 8DG.

Procedure

All complaints, written or verbal, are logged, and Triple Act will formally acknowledge receipt of the complaint. We will then provide a written response to the complainant within ten working days, detailing where necessary the further course of action to be taken. Where it is not possible to provide a full response within this time frame, a letter will be sent to the complainant outlining progress and indicating when a response is likely to be forthcoming.

If the complainant is satisfied with the response, the matter will be considered to have been closed. If the complainant remains dissatisfied with the explanation, or course of action, he/she can appeal further.

Triple Act a different course of action should be adopted. The outcome of this review will normally be communicated in writing to the complainant within 15 working days of the appeal being lodged. If the matter remains unresolved, he/she has the right to consult a third-party arbitrator, and an agreed process will be put in place. This complaints procedure is reviewed annually by Triple Act or at shorter interval should legislation of good practice require it.

Whistleblowing Policy

Triple Act Theatre & Arts aim to create a safe and supportive ethos to ensure these policies are upheld therefore we promote the rights of staff and volunteers to report negative practices.