LUCA SILVESTRINI'S
PROTEIN
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PROTEIN DANCE

Safeguarding Policy Procedures and Code of Conduct

Protecting children, adults at risk, participants, staff, artists and volunteers in all Protein activity

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Contents

1 Purpose and scope
2 Our safeguarding commitments
3 Legal and practice framework
4 Definitions
5 Roles and accountability
6 Prevention and safer working
7 Safer recruitment and DBS checks
8 Planning safe projects and partnerships
9 Code of conduct and professional boundaries
10 Safe touch and physical practice
11 Digital communication and online safety

12 Photography filming and consent
13 Recognising abuse and safeguarding concerns
14 Responding to a disclosure
15 Reporting and referral procedure
16 Allegations about staff artists volunteers or trustees
17 Low level concerns
18 Adult safeguarding disabled people and people seeking sanctuary
19 Whistleblowing complaints and speaking up
20 Confidentiality information sharing and records
21 Incident management learning and external reporting
22 Training induction and assurance
23 Policy review
Appendix 1 Categories and possible indicators of abuse
Appendix 2 Immediate response guide
Appendix 3 Key contacts
Appendix 4 Safeguarding concern record
Appendix 5 Project safeguarding checklist
Appendix 6 Declaration

Important: if anyone is in immediate danger, call 999. Do not delay action while trying to contact a manager.

1 Purpose and scope

Luca Silvestrini's Protein is a dance-theatre company and registered charity. We connect people and everyday life through dance. This policy explains how Protein prevents harm, responds to concerns and creates safe, respectful conditions for everyone who encounters our work.

It applies to trustees, employees, artists, freelancers, volunteers, placement students, contractors and anyone acting on Protein's behalf. It covers work in person and online, at Protein's base and partner venues, in public spaces, schools, community settings, alternative provision, residential or touring contexts, and activity delivered elsewhere in the UK or internationally.

The policy protects children, adults at risk, participants, audiences, staff, artists, volunteers and other people affected by Protein's work. Everyone working for or with Protein must follow it. A partner's policy may add local arrangements, but it does not remove Protein's responsibility to act on a concern.

2 Our safeguarding commitments

Protein will put people's welfare, rights, dignity and voice at the centre of its work. Safeguarding is part of governance, artistic planning, employment, commissioning, partnership working and day-to-day delivery.

- take all concerns seriously and respond promptly, proportionately and without discrimination;
- create an open culture in which people know how to raise a concern and can do so without fear of retaliation;
- listen to children and adults and, wherever possible, involve them in decisions affecting them;
- recognise the unequal power that can exist between organisations, artists and participants;
- take particular care where participants have experienced trauma, displacement, racism, disability, poverty, exclusion or other barriers, without assuming that identity or circumstance automatically makes a person an adult at risk;
- make reasonable adjustments and provide accessible ways to participate and report concerns;
- work with statutory agencies, venues and delivery partners and share information lawfully when necessary to prevent harm;
- learn from incidents, complaints, near misses and participant feedback; and
- never allow artistic ambition, reputation, funding or relationships to take priority over safety.

3 Legal and practice framework

This policy is informed by applicable law and current statutory and regulatory guidance, including the Children Acts 1989 and 2004; the Children and Social Work Act 2017; the Care Act 2014; the Mental Capacity Act 2005; the Equality Act 2010; the Domestic Abuse Act 2021; the Online Safety Act 2023; the Human Rights Act 1998; the Data Protection Act 2018 and UK GDPR; relevant employment and health and safety law; Working Together to Safeguard Children; Care and Support Statutory Guidance; Disclosure and Barring Service guidance; and Charity Commission safeguarding guidance.

Protein will also follow the procedures of the safeguarding partnership or authority in the place where activity happens. Where law or local arrangements change, the current requirement takes precedence and the policy will be updated.

4 Definitions

Term	Meaning in this policy
Child	Anyone under 18. If age is uncertain, Protein will act protectively and seek advice.
Adult at risk	An adult aged 18 or over who has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves from the risk or experience of abuse or neglect.
Safeguarding	Preventing harm and responding effectively when abuse, neglect, exploitation, unsafe practice or another welfare concern is suspected or identified.
Participant	Anyone taking part in a Protein class, workshop, residency, performance, placement, consultation or community activity.

Partner	An organisation that co-designs, hosts, refers participants to, funds or helps deliver Protein's work.
Low level concern	Behaviour that is inconsistent with the code of conduct, including an inappropriate boundary, even when it does not meet the threshold for a statutory referral or formal allegation.
Position of trust	A role in which a person has authority, influence, responsibility or access in relation to a child or adult at risk.
Person seeking sanctuary	A person seeking safety from war, persecution, violence or human-rights abuse. This includes refugees, people seeking asylum, people with temporary or uncertain immigration status, and people displaced from their homes. This status does not by itself make an adult an adult at risk.
Disabled person	A person with a physical or sensory impairment, learning disability, neurodivergence, long-term health condition or mental-health condition who may encounter disabling barriers. Disability does not by itself mean that an adult lacks capacity or is an adult at risk.
Local Authority Designated Officer (LADO)	The local authority officer responsible for providing advice and oversight when an allegation or concern is raised about an adult who works or volunteers with children. Greenwich Contact: 0208913930. childrens-Lado@royalgreenwich.org.uk

Protein uses "adult at risk" rather than "vulnerable adult". Refugee or asylum-seeking status, disability, age or trauma does not by itself define a person as an adult at risk; risks and support needs must be understood in context.

5 Roles and accountability

Board of Trustees

- holds ultimate responsibility for safeguarding governance and for ensuring adequate resources, policies, training and oversight;
- appoints a trustee safeguarding lead and receives safeguarding assurance at least quarterly, with safeguarding as a standing Board agenda item;
- reviews anonymised trends, risks, actions, complaints, near misses and lessons, while protecting confidentiality;
- approves this policy at least annually and after a serious incident or material change in activity; and
- ensures serious incidents are reported to the Charity Commission and other regulators when required.

Chief Executive and Artistic Director

- ensures the policy is implemented and properly resourced;
- supports the DSO and acts on organisational, contractual or disciplinary matters;
- ensures artistic decisions and working practices reflect safeguarding requirements; and
- does not manage a concern personally where they are implicated or where independence would be compromised.

Designated Safeguarding Officer

Caron Loudy, Executive Producer | 07711 140432 | caron@proteindance.co.uk

- receives concerns, supports immediate risk assessment and decides referrals in consultation with statutory agencies where appropriate;
- keeps secure, accurate records and a restricted safeguarding log;
- ensures referrals are made promptly and never later than required by local procedure;
- liaises with partners, the LADO or equivalent, children's social care, adult social care, police, DBS and other agencies;
- coordinates training, induction and project safeguarding arrangements;
- reports anonymised themes and assurance information to the CEO and Board safeguarding lead; and
- reviews actions and learning after incidents and near misses.

Deputy Designated Safeguarding Officer

Michael Johnson, Producer | 07879 635062 | michael@proteindance.co.uk

The Deputy Designated Safeguarding Officer supports the DSO and acts as the safeguarding lead when the DSO is unavailable. His responsibilities are to:

- maintain appropriate safeguarding training and an up-to-date understanding of this policy and local referral arrangements;
- receive concerns and disclosures, assess immediate safety and ensure urgent action is taken;
- make an accurate, confidential record and notify the DSO as soon as it is safe and appropriate to do so;
- consult or refer to children's social care, adult safeguarding, the LADO, police or another relevant agency when required, without waiting for the DSO if delay could increase risk;
- support project leads, staff, artists, freelancers and partners to understand and follow safeguarding arrangements;
- help maintain the restricted safeguarding log, training records and follow-up actions;
- identify patterns, unresolved risks and learning and bring them to the DSO, CEO or Board safeguarding lead as appropriate; and
- step aside and use the alternative reporting route if he is personally involved in, implicated by, or conflicted in relation to a concern.

Alternative reporting routes

If the DSO cannot be reached, concerns must go to the Deputy. If both are unavailable and someone may be at risk, staff must contact the relevant statutory service or police directly; lack of management availability must never delay a referral.

A concern about the DSO must be reported to the CEO and Board safeguarding lead. A concern about the CEO must be reported to the Chair and Board safeguarding lead. A concern about the Chair or a trustee must be reported to the Board safeguarding lead or another unconflicted trustee. If those routes are unavailable or unsafe, contact the relevant statutory authority, police, NSPCC or Charity Commission whistleblowing service directly.

Everyone working with Protein

Everyone must read this policy, complete required induction and training, follow the code of conduct, respond to immediate danger, record facts and report concerns promptly. Nobody should investigate suspected abuse themselves.

6 Prevention and safer working

- Make safeguarding part of project design, contracts, access planning, budgets, schedules and risk assessments.
- Explain behaviour expectations and reporting routes to participants in accessible language at the beginning of activity.
- Plan appropriate supervision, staffing, arrival and departure arrangements and emergency contacts.
- Avoid one-to-one situations where practicable. Where individual work is necessary, make it observable, interruptible, risk assessed and agreed with Protein and the host or parent/carer where appropriate.
- Respect participants' names, pronouns, communication methods, culture, faith, disability, privacy and bodily autonomy.
- Use trauma-aware practice: offer choice, explain what will happen, avoid unnecessary pressure and allow participants to pause or leave safely.
- Do not use alcohol or recreational drugs before or during work. Prescribed medication must be stored safely.
- Do not work when impaired by alcohol, drugs, fatigue or illness in a way that risks safety.
- Only trained and authorised people may provide personal care, first aid or medication. Project plans must state who is responsible.
- Report hazards, accidents, boundary concerns and near misses, even when no injury or abuse is established.

7 Safer recruitment and DBS checks

Safeguarding checks form part of Protein's wider safer-recruitment process. They do not replace professional judgement, references, induction, supervision or safeguarding training. These arrangements apply to employees, freelance artists, tutors, contractors, volunteers and trustees, according to their role and responsibilities.

- Role assessment: Every role is risk assessed to establish the safeguarding responsibilities and whether a basic, standard, enhanced or enhanced with barred-list DBS check is lawful and appropriate. Protein uses current DBS eligibility guidance and will not request a level of check for which the role is not eligible.
- Recruitment procedures: Recruitment includes a clear role description and safeguarding responsibilities; application or work-history information; identity and right-to-work checks as applicable; relevant qualification checks; exploration of unexplained employment gaps; structured interview questions; and at least two references where proportionate. References for roles involving children or adults at risk should address suitability for the work and any relevant safeguarding concerns. Unclear or concerning references will be followed up. At least one person involved in recruiting to these roles should have undertaken safer-recruitment training. Reference Forms will be sent from Protein to referee e-mail address.
- Freelance and occasional appointments: Artists and tutors appointed through recommendations or previous working relationships remain subject to appropriate safer-recruitment checks. Any reduced checks for a one-off, supervised guest contribution must be supported by a documented risk assessment, a safeguarding briefing and clear supervision arrangements. Such arrangements must not override any legal checking requirement.
- Original DBS certificates: A designated member of Protein's core team must inspect the original paper standard or enhanced DBS certificate in person, verify the holder's identity and confirm that the certificate is appropriate for the role. Photocopies, scans, photographs or certificates shown over a video call are not accepted as substitutes. The date of inspection and the name of the person who inspected the certificate must be recorded.
- DBS Update Service: Employees whose roles require standard or enhanced DBS checks must maintain an active Update Service subscription. Freelance artists and tutors undertaking such roles are expected to do the same. Individuals are responsible for maintaining their subscription, renewing it on time and keeping their contact, address and payment details current. They must notify Protein promptly if their subscription lapses or their certificate status changes. Protein obtains and records consent and confirms continued legal eligibility before carrying out status checks.
- Annual checks: Protein carries out and records an Update Service status check at least once every 12 months for all current core-team members, artists, tutors, volunteers and trustees whose roles require a standard or enhanced DBS check and whose certificates are registered with the service. This annual review also confirms that the certificate remains appropriate for the person's current duties. Where the Update Service cannot be used, the Designated Safeguarding Officer determines and records the arrangements for a fresh check, according to the role's risk and legal eligibility.
- Checks before each project: In addition to annual checks, Protein carries out an Update Service status check on every relevant artist and tutor before each new project involving children or adults at risk. For ongoing programmes, further checks are made at least annually and sooner if duties change or safeguarding concerns arise.

- Changed status or lapsed subscriptions: If a status check indicates new information, or a subscription has lapsed or cannot be verified, Protein will not treat the previous certificate as confirmation of current suitability. The Designated Safeguarding Officer will arrange a fresh check where appropriate and document any interim restrictions or supervision. A change in status does not, by itself, establish wrongdoing.
- School visits: Anyone deployed by Protein to work in a school whose role requires a DBS check must bring their original paper certificate and suitable identification for inspection by the school. Protein will agree checking and visitor arrangements with the school in advance and confirm that its own required checks have been completed.
- Secure checking register: The Designated Safeguarding Officer ensures that Protein maintains a secure spreadsheet recording the person's name and role; required check level and workforce; certificate number and issue date; any relevant barred-list check; date the original certificate was inspected and by whom; consent for Update Service checks; dates and outcomes of status checks; the person conducting each check; and the next review date. Access is restricted to authorised staff. Detailed criminal-record information and safeguarding assessments are held separately with appropriate confidentiality.
- Fair consideration and confidentiality: DBS information is considered fairly and confidentially under Protein's recruitment of ex-offenders arrangements. A criminal record does not automatically prevent appointment. Decisions consider legal restrictions, relevance to the role, seriousness, recency, any pattern, the individual's explanation and safeguarding risk. Protein will not request or take account of information that it is not legally entitled to consider.
- Certificate retention: Protein normally records the necessary checking details rather than retaining copies of DBS certificates. Any exceptional retention must have a lawful, documented reason and comply with the DBS Code of Practice and data-protection requirements. Certificates and associated information must not be retained longer than necessary.
- Overseas checks: For people who have lived or worked overseas, Protein considers appropriate overseas criminal-record and professional checks alongside UK checks. Where information cannot be obtained, the limitations and any additional safeguards must be recorded in a risk assessment.
- Conditional appointments: Appointments may remain conditional until checks and references are complete. Any exceptional start before completion requires written senior approval, a documented risk assessment and additional supervision. No exception may override a legal requirement or permit a barred person to undertake regulated activity.
- Induction and ongoing responsibility: Before starting work, individuals receive an appropriate safeguarding briefing, confirm that they have read and understood Protein's safeguarding policy and code of conduct, and know how to report concerns. They must promptly disclose relevant changes affecting their suitability to undertake the role, within the limits of information Protein may lawfully request. They sign a declaration confirming these points.

- DBS referrals: Protein will make a referral to the DBS where it has a legal duty to do so, including where a person undertaking regulated activity has been removed, or would have been removed had they not left, and the statutory referral conditions are met.

8 Planning safe projects and partnerships

The project lead completes a safeguarding risk assessment before delivery and updates it when circumstances change. It covers the participants, venue, activity, staffing, access, communication, travel, digital activity and foreseeable emergencies.

- Confirm the DSO, on-site safeguarding contact, first aider, emergency arrangements and reporting route.
- Clarify responsibility for registration, consent, medical and access information, attendance, collection and missing-person action.
- Assess toilets, changing areas, public access, outdoor spaces, transport, lone working, home visits, overnight stays, personal care, medication, filming and online contact where relevant.
- Agree age-appropriate staffing and supervision. Protein will not rely on a fixed ratio without considering the activity, setting, individual needs and partner requirements.
- For schools, alternative provision and youth settings, agree who retains pastoral responsibility and follow the host's procedures as well as this policy.
- For adult and sanctuary projects, agree accessible reporting, interpreters or advocates, consent and information-sharing arrangements without requiring disclosure of immigration history unless necessary and lawful.
- For international work, identify local law, referral bodies, emergency services, cultural and language risks, insurance and a UK escalation route.

Written partner arrangements

A contract, memorandum or project agreement with a delivery partner must identify each organisation's responsibilities, the policy that applies on site, named safeguarding contacts, safer-recruitment expectations, information-sharing and record ownership, incident notification timescales and who makes external referrals. Protein must satisfy itself that the partner has appropriate safeguarding arrangements. Uncertainty about responsibility must never delay action to protect someone.

Children performing in shows and films

Where children take part in Protein productions, public performances or filming, the project lead must establish whether child performance licences, a Body of Persons Approval or a lawful exemption are required. In England, performance licensing applies to children below compulsory school-leaving age. Requirements elsewhere must be checked with the relevant authority.

- **Licensing:** Agree in writing who is responsible for applications and compliance. Obtain the necessary licence or approval, or document the basis for an exemption, before the relevant

activity begins. Do not assume that an unpaid, community or school-linked project is exempt.

- **Chaperones:** Where required, children must be supervised by a local-authority-approved chaperone, unless they are in the care of their own parent or a teacher permitted under the applicable regulations. A parent may not supervise other children without the necessary approval. A DBS check alone does not authorise someone to act as a licensed chaperone.
- **Checking and briefing:** Verify chaperone approval, identity and any restrictions before appointment. Chaperones must understand Protein's safeguarding procedures, reporting routes and their authority to stop activity where a child's welfare is at risk.
- **Welfare and working conditions:** Comply with applicable limits and licence conditions covering attendance, rehearsal and performance hours, breaks, education, travel and accommodation. Provide suitable changing, toilet and rest facilities, refreshments and appropriate supervision.
- **Responsibilities and records:** Identify who holds responsibility for each child throughout arrival, rehearsals, performances, breaks and departure. Maintain attendance and other required records securely. Chaperones must not undertake additional duties that compromise supervision.
- **Children's voice:** Explain the activity in accessible language, obtain appropriate parental consent and listen to the child's wishes. A child must be able to raise concerns, request a break or stop participating without pressure.

Arrival, collection, uncollected and missing children

Each project involving children must have written arrival, departure and missing-child arrangements, agreed with the venue, school or delivery partner and explained to parents, carers and staff. These must identify when responsibility for supervision passes between adults or organisations.

Arrival and collection

- Keep an accurate attendance register and record arrivals, departures and transfers of responsibility.
- Obtain current parent/carer and emergency contact details, authorised collectors and relevant information about collection restrictions.
- Release a child only to an authorised person. Verify unfamiliar collectors and confirm changes through an established parent/carer contact.
- Independent departure must be agreed in advance, supported by written parent/carer permission and an assessment of the child's age, understanding, access needs and safety.
- If a collector appears unable to care safely for the child, or collection raises a safeguarding concern, seek immediate advice from the DSO and statutory services as appropriate. Call 999 if there is immediate danger.

Late or non-collection

- Keep the child safely supervised in an appropriate space, with two authorised adults wherever practicable.
- Contact the parent/carer and then the agreed emergency contacts. Notify the project lead and DSO or Deputy promptly.

- Never leave a child alone, send them home without an agreed safe arrangement, or take them to a worker's home.
- The project plan must specify an escalation point for contacting children's social care or its out-of-hours service if no safe collection can be arranged. Act sooner where there are welfare concerns; call 999 in an emergency.
- Record the delay, contact attempts, decisions and eventual handover. Repeated late collection must be reviewed with the parent/carer and DSO.

Missing child

- Act immediately when a child's whereabouts cannot be accounted for. Alert the project lead, venue staff and DSO or Deputy.
- Check the register and establish when and where the child was last seen. Keep all other children appropriately supervised.
- Arrange a coordinated check of immediate locations, including toilets, changing rooms and agreed activity areas. Allocate responsibilities and maintain communication; do not send children to search.
- Contact the police promptly if the child is not located immediately. Call 999 where there is immediate danger, suspected abduction or an urgent risk because of the child's age, health, disability or circumstances. There is no requirement to wait 24 hours.
- Notify the parent/carer promptly unless police or children's social care advise that doing so could increase risk. Provide police with the child's description, last known location, relevant needs and actions already taken.
- When the child is found, check their welfare, listen calmly and inform everyone involved in the response. Record the incident and review supervision and prevention arrangements before activity resumes.

Children watching shows

Where a production (live performance or film) contains more adult themes or explicit language which may be considered inappropriate for children or young people, the Executive Producer and Producer will collaborate on what guidance should be communicated to venues and partners, such as age guidance 13+ or specific content warnings. Relevant information to be shared with venues and partners to cascade through relevant teams such as programming, marketing and box office.

9 Code of conduct and professional boundaries

People representing Protein must:

- treat everyone fairly, respectfully and with dignity; challenge discrimination, bullying, harassment and degrading behaviour;
- maintain relationships focused on the work and never use status, access or trust for personal, sexual, emotional, political or financial advantage;
- use age-appropriate and inclusive language and avoid humiliating, sexualised, discriminatory or threatening comments, gestures or material;

- work openly and accountably, follow venue rules and remain within the responsibilities of their role;
- give constructive feedback and never shout at, ridicule, intimidate or deliberately isolate a participant;
- not initiate or pursue sexual or romantic relationships with children, or with adults where a professional position of trust, dependency or significant power imbalance exists;
- not give or accept inappropriate gifts, loans or money, or favour particular participants;
- not share personal phone numbers, private social-media accounts or home addresses with children or adults at risk; use approved Protein channels and e-mail addresses;
- not photograph, film or record participants on a personal device;
- not transport a child or adult at risk alone in a personal vehicle unless specifically authorised and risk assessed, except in a genuine emergency;
- report any concern about their own conduct or another person's behaviour promptly.

Studio and venue practice

- Explain activities, boundaries and any potentially distressing content in advance and allow meaningful choice.
- Follow agreed arrangements for toilets and changing. Adults must not change with children and should use staff facilities where available.
- Know who is responsible for first aid and pastoral care. In an emergency, provide reasonable assistance within your competence and call qualified help.
- Keep spaces observable and avoid locking doors during delivery. Tell a colleague before leaving the space.
- Do not smoke or vape near the activity. Alcohol and recreational drugs must not be brought into participant spaces.
- Clear equipment and hazards and leave the space safely.

Protecting staff, artists and volunteers from harassment

Protein will take all reasonable steps to prevent sexual harassment and harassment by third parties in the course of its work. Its organisational protection extends to employees, freelance artists, contractors and volunteers, regardless of contractual status.

Participants, parents, carers, audience members, visitors, partners and others must treat people working with Protein respectfully. Protein will not tolerate sexual harassment, discriminatory harassment, bullying, threats, stalking, intimidation or abusive behaviour, whether in person, online or through other communications.

- **Prevention:** Project and workplace risk assessments must consider foreseeable harassment risks, including public contact, lone working, backstage access, touring, social events and online communication. Put appropriate controls in place and review their effectiveness.
- **Clear expectations:** Explain behaviour standards and reporting routes to participants and partners. Agree with venues who will respond to audience misconduct, provide security support and authorise removal where necessary.

- **Immediate safety:** Workers may pause or stop activity and withdraw to safety if they experience harassment or feel threatened. They are not expected to confront the person responsible or manage the incident alone. Call 999 where there is immediate danger.
- **Reporting:** Concerns may be reported to the project lead, DSO, Deputy or an unconflicted senior person using the alternative reporting routes in section 5. A safeguarding referral must not replace appropriate management action on workplace harassment.
- **Response:** Take reports seriously, record them promptly, assess immediate risks and arrange a fair response by an unconflicted person. Protective action need not wait for a repeated incident or formal complaint.
- **Action:** Depending on the circumstances, measures may include additional supervision, restrictions on contact, warnings, removal from an event, exclusion from future activity, contractual action or referral to police or safeguarding services.
- **Support and fairness:** Offer appropriate support to the affected worker and protect them from retaliation. Where the person responsible is a child or has additional needs, consider safeguarding, communication and reasonable adjustments while maintaining everyone's safety.
- **Learning:** Review incidents and near misses, provide relevant staff training and update risk assessments, partner arrangements and preventive measures.

10 Safe touch and physical practice

Dance can involve physical contact, but touch is not automatically necessary or acceptable. Consent must be specific, informed, freely given, current and capable of being withdrawn at any time. Silence, familiarity or previous consent is not consent.

- Explain and demonstrate the purpose of touch before it happens. Offer a no-touch alternative wherever possible.
- Ask permission each time or establish an agreed consent method for a clearly defined exercise; check understanding and continue to observe comfort.
- Use only touch that is necessary, proportionate, functional and appropriate to the activity. Avoid intimate areas.
- Do not use touch to punish, control, compel participation or manage behaviour, except proportionate action necessary to prevent immediate harm.
- Respect verbal and non-verbal refusal immediately. Consider communication differences and do not assume capacity or consent.
- Where a participant initiates contact, respond warmly but maintain professional boundaries and redirect where necessary.
- Record and report accidental injury, distress, misunderstanding, an unexpected intimate contact or any concern about touch. Inform parents, carers or partner staff when appropriate and safe.

11 Digital communication and online safety

- Use approved Protein accounts, platforms and devices when working with children. Apply passwords, waiting rooms, access controls and appropriate privacy settings.
- When Artistic Director, Executive Producer or Producer from Protein core team use personal phones to take photographs of adults, images are added to password protected share point as soon as possible and deleted from personal mobile devices.

- Do not privately message a child from a personal account. Communications should include a parent, carer, school or authorised Protein colleague where appropriate.
- Group messages must have a clear purpose, appropriate membership and agreed moderation. Staff must not delete safeguarding-related messages.
- Set expectations for cameras, microphones, recording, chat and conduct before an online session. Never record without explicit consent and an agreed lawful purpose.
- Assess the suitability, minimum age, privacy and data handling of a platform before use.
- Do not share live locations, personal details or identifying information that could endanger participants, particularly people seeking sanctuary.
- Report harmful content, grooming, sexual imagery, threats, impersonation or other online concerns through the same safeguarding route as offline concerns.
- Where indecent images of a child may be involved, do not view, copy, forward or ask for the image. Preserve the device or message safely and seek immediate specialist or police advice.

12 Photography filming and consent

Protein often documents activity, but participation must not depend on agreeing to promotional photography unless recording is integral and this has been made clear in advance.

- Obtain informed, recorded consent for taking and for each intended use of images. For children, obtain parent or carer consent and involve the child in the decision. For adults, including adults at risk, obtain the adult's own consent unless a lawful alternative applies.
- Explain where material may appear, how long it will be retained and how consent can be withdrawn. Withdrawal cannot always remove material already printed or lawfully published, and this must be explained.
- Use a clear method to identify people who must not be photographed without stigmatising them.
- Avoid combining a person's full name with precise location or other identifying information unless specifically agreed and safe.
- Use authorised photographers with written briefs and appropriate checks or supervision. Images must not be captured or retained on personal devices.
- Store and transfer material securely with access limited to authorised people. We will keep photographs indefinitely unless there is a reason we have been notified about.
- Never pressure a refugee, asylum seeker, survivor of abuse, child or adult at risk to be photographed or filmed.

13 Recognising abuse and safeguarding concerns

A safeguarding concern may arise from something seen, heard, disclosed, reported, recorded online or noticed as a pattern. It may involve deliberate abuse, neglect, exploitation, unsafe practice, self-neglect or a person's welfare. Abuse can be a single act or repeated, and can happen in families, institutions, communities, workplaces or online. The person causing harm may be an adult or child and may be known to the person.

Indicators do not prove abuse. Staff should remain professionally curious, record facts and report concerns rather than trying to diagnose or investigate. Categories and possible indicators appear in Appendix 1.

14 Responding to a disclosure

If someone tells you they have been harmed or are worried:

1. Stay calm, listen carefully and take the person seriously.
2. Use their preferred communication method and make reasonable adjustments. Arrange an independent interpreter or advocate if needed; do not use an alleged perpetrator or another participant to interpret.
3. Do not investigate, challenge, confront the alleged perpetrator or ask leading questions. Use only open prompts needed to understand immediate safety, such as “Tell me what happened”, “Explain what you mean” or “Describe what you are worried about”.
4. Reassure them that telling you was right and that the harm is not their fault.
5. Do not promise secrecy. Explain that you will share only with people who need to help keep them or someone else safe.
6. Check whether anyone is in immediate danger or requires urgent medical help. Call 999 when necessary and preserve evidence.
7. Tell the DSO or alternative safeguarding contact immediately.
8. As soon as possible, write a factual record using the person’s own words. Include date, time, place, people present, what was seen or heard, questions asked, actions taken and the date and time of your report. Sign it and do not amend the original record.

Do not contact parents or carers automatically. The DSO or statutory agency will decide when this is appropriate, particularly if doing so might increase risk, compromise evidence or conflict with the wishes and rights of an adult with capacity.

15 Reporting and referral procedure

Situation	Required action
Immediate danger, serious injury or suspected crime	Call 999. Make the situation safe within your competence. Preserve evidence. Tell the DSO as soon as possible.
Concern about a child	Tell the DSO immediately. The DSO will consult or refer to the local children’s social care or MASH service. Anyone may refer directly if delay or management inaction could place a child at risk.
Concern about an adult at risk	Tell the DSO immediately. Consider the adult’s wishes and capacity, but refer without consent where there is immediate danger, coercion, a crime, risk to others, public-interest need or another lawful reason.
Concern arising at a partner venue	Protect the person and tell Protein’s DSO and the venue safeguarding lead. Follow both procedures. If roles are unclear, ensure one named person makes the referral and records confirmation.

DSO or deputy unavailable	Contact the relevant statutory service or police directly. Then inform Protein's unconflicted senior contact or Board safeguarding lead.
Unsure whether threshold is met	Seek advice from the DSO or statutory safeguarding service. Do not delay because information is incomplete.

The DSO records the decision, advice received, person consulted, referral time, reference number and follow-up. If a referral is not made, the rationale and protective action must be recorded. Disagreement with an agency decision should be escalated through that agency's professional-challenge process where risk remains.

16 Allegations about staff artists volunteers or trustees

An allegation includes information suggesting that a person working with children has harmed or may have harmed a child, may have committed an offence involving a child, may pose a risk of harm, or may be unsuitable to work with children. Comparable concerns involving adults at risk must also be referred for specialist advice.

- Protect the child or adult and report through the alternative routes in section 5 if the usual recipient is implicated.
- Do not investigate, interview witnesses repeatedly, promise an outcome or tell the person who is the subject of the allegation before receiving advice if this could increase risk or compromise an enquiry.
- The senior unconflicted manager must consult the relevant LADO or equivalent for child-related allegations within one working day, and adult safeguarding or police as appropriate.
- Protein will coordinate any employment or contractual action with statutory agencies. Suspension is a neutral protective measure, not an assumption of guilt, and alternatives will be considered.
- The person subject to an allegation will be treated fairly, informed as permitted and offered appropriate support, while the safety and rights of those affected remain central.
- Protein will make DBS, Charity Commission, insurer, funder or professional-regulator notifications where legally or contractually required.
- At the end of the process, Protein will record the outcome using appropriate categories, communicate it on a need-to-know basis and review lessons.

17 Low level concerns

A low-level concern is any behaviour inconsistent with this policy or the code of conduct, however small it may appear. Examples include favouritism, over-familiarity, unnecessary one-to-one contact, personal messaging, inappropriate gifts, insensitive language, capturing images without authority or blurred boundaries.

Low-level concerns must be reported to the DSO or appropriate alternative. The DSO records and reviews them for patterns, takes proportionate action and considers whether new information raises the concern to a formal allegation or statutory-referral threshold. No one will be penalised for raising a genuine concern in good faith.

18 Adult safeguarding disabled people and people seeking sanctuary

Safeguarding all adults who may be at risk

Protein works with adults across its artistic, participation and community programmes. Some may meet the Care Act definition of an adult at risk; others may face serious welfare concerns, abuse or exploitation without meeting that statutory threshold. Protein will respond to both. A concern must still be reported when the threshold is uncertain so that advice can be obtained and appropriate support offered.

An adult may be at increased risk because of care and support needs, disability, learning disability, neurodivergence, sensory impairment, dementia, frailty, long-term illness, mental ill health, acquired brain injury, substance dependence, domestic abuse, homelessness, isolation, poverty, trauma, displacement, language barriers or dependence on another person. These factors must be considered in context. No label or diagnosis automatically determines risk, capacity or the response required.

Adult safeguarding will be person-led and outcome-focused. Protein will ask what the adult wants to happen, support informed choice and arrange advocacy, interpretation or communication support where needed. Adults with capacity may make decisions that others consider unwise. Protein will not remove choice simply because someone is disabled, distressed, older, displaced or seeking sanctuary.

Disabled Deaf and neurodivergent adults

Disabled people can face additional barriers to recognising, escaping or reporting abuse. They may depend on another person for communication, transport, money, medication, personal care or access to activities. Behaviour or distress may be wrongly attributed to an impairment, and communication may not be recognised as a disclosure. Protein will remain alert to these risks without treating disabled people as passive or incapable.

- Ask each person how they communicate, what reasonable adjustments they need and who, if anyone, they want to support them.
- Use accessible information and communication, including Easy Read, captions, British Sign Language, communication aids, additional processing time or an independent advocate where appropriate.
- Speak directly to the adult rather than only to a carer, interpreter or support worker. Do not assume that a companion is safe or that they accurately represent the adult's wishes.
- Do not use an alleged perpetrator, controlling person or another participant to interpret a safeguarding disclosure. Use an independent, appropriately skilled interpreter or advocate.
- Recognise disability-related abuse, including withholding medication, mobility or communication equipment; inappropriate restraint; rough handling; neglect of personal care; financial control; denial of access; fabricated incapacity; sexual abuse; and coercion by a carer or support provider.
- Make safe-touch and movement work accessible. Seek specific consent, explain alternatives and never treat silence, compliance, limited speech or previous participation as consent.
- Do not assume that distress, behaviour, limited English, learning disability, neurodivergence, mental ill health or an unfamiliar communication style means that the person lacks capacity.

- Record the person's own communication accurately, including gestures, communication-aid output or an interpreter's words, and note who provided communication support.

People seeking sanctuary refugees and migrants

Protein's work may include refugees, people seeking asylum, undocumented migrants, survivors of trafficking and people with temporary or uncertain immigration status. These experiences do not automatically make an adult an adult at risk. However, displacement, trauma, poverty, racism, language barriers, isolation and dependence on accommodation, employers, sponsors, family members or services can increase exposure to harm and make it harder to seek help.

Concerns may include:

- human trafficking, modern slavery, forced labour, sexual exploitation or criminal exploitation;
- domestic abuse, forced marriage, so-called honour-based abuse, female genital mutilation or coercive control;
- hate crime, racist abuse, harassment, discrimination or community hostility;
- unsafe or exploitative accommodation, homelessness, destitution or financial abuse;
- another person controlling someone's passport, immigration documents, phone, money, travel or contact with services;
- threats linked to immigration status, sponsorship, employment, housing or disclosure to authorities;
- exploitation by someone presenting themselves as an adviser, interpreter, community leader, employer or supporter;
- severe distress, self-neglect, self-harm, suicidal thoughts or deterioration in mental health; and
- a child or adult going missing, being moved unexpectedly or being prevented from attending activities.

Safe and respectful practice with sanctuary seekers

- Provide welcoming and accessible ways to raise a concern without requiring a participant to disclose their history or immigration status.
- Ask which name and safe contact method to use, whether messages may be left, and whether anyone monitors the person's phone, email, travel, money or documents.
- Avoid requesting immigration documents or details unless they are necessary for a defined and lawful purpose.
- Never promise that a safeguarding referral will affect, protect or resolve an immigration claim. Protein staff must not give immigration advice unless professionally qualified and authorised.
- Consider whether contacting family, a sponsor, accommodation provider, community representative or partner organisation could increase risk. Do not contact them automatically.
- Do not pressure anyone to recount trauma, participate, be photographed, speak publicly or share a personal story.
- Recognise that fear of authorities may affect disclosure. Explain honestly what Protein must share, what it can keep private and what will happen next.
- Apply the same boundaries and safeguarding standards to paid, free and subsidised activity, including weekly classes, Refugee Week events, performances, training and co-created work.

Consent information sharing and mental capacity

Where an adult has capacity, Protein will normally seek consent before making a safeguarding referral and will respect the outcomes they want. The DSO will explain the options and foreseeable consequences, including what Protein can and cannot control after information is shared.

Consent is not required before sharing information where there is an immediate risk of serious harm, suspected coercion, a serious crime, risk to a child or another adult, a legal duty, court order or overriding public-interest justification. A refusal of consent must be explored carefully where there may be threats, trafficking, dependence or coercive control. The DSO records the decision, rationale and information shared.

If capacity to make the particular decision is in doubt, Protein follows the Mental Capacity Act principles and seeks specialist advice. Capacity is decision-specific and time-specific. Staff must support the person to understand and communicate before concluding that they cannot decide.

Adult safeguarding referral and support

Where an adult appears to meet the Care Act safeguarding criteria, the DSO will contact the local authority adult safeguarding service. In Greenwich, the current contact is listed in Appendix 3. If the statutory threshold may not be met, Protein will still consider emergency, health, domestic-abuse, homelessness, disability, advocacy, trafficking or other specialist support. In immediate danger, call 999.

If modern slavery or trafficking is suspected, the DSO will seek specialist advice about immediate safety, police involvement and the National Referral Mechanism. An adult's informed consent is normally required for a National Referral Mechanism referral. Protein will not confront a suspected trafficker or take action that could increase danger.

19 Whistleblowing complaints and speaking up

Participants, parents, carers, staff and partners may raise concerns verbally or in writing with any Protein worker, the DSO, the CEO, the Chair or the Board safeguarding lead. Accessible support, interpretation or advocacy will be arranged where reasonably possible. Safeguarding concerns are acted on under this policy even when they are also complaints.

Workers who believe wrongdoing, concealment or unsafe practice is occurring may use Protein's Whistleblowing Policy or contact an appropriate external body. Protein will not subject anyone to retaliation for raising a genuine concern in good faith. Deliberately false and malicious reports may be addressed separately, but an unsubstantiated concern is not automatically malicious.

20 Confidentiality information sharing and records

Safeguarding information is handled under the Data Protection Act 2018 and UK GDPR. Data protection does not prevent necessary and proportionate sharing to protect a child or adult. Consent is one possible lawful basis, not the only one.

- Share relevant, accurate, timely and necessary information only with people who need it to protect someone, manage an allegation or meet a legal or regulatory duty.
- Tell the person what will be shared where it is safe and appropriate. Record the lawful basis, purpose, recipient and reason for sharing or not sharing.

- Keep safeguarding files separate from routine personnel or participant records, encrypted or locked, with access restricted to the DSO and specifically authorised senior people.
- Use a unique reference on general logs where possible. Email and messaging should contain no more sensitive information than necessary.
- Never alter an original concern record. Corrections or later information must be dated and added separately.
- Retain records according to Protein's approved retention schedule and relevant legal, insurance, contract and statutory guidance. The DSO will not use "indefinite" retention as a default. A retention or review date must be recorded for each case.
- Report suspected loss, unauthorised access or disclosure promptly under Protein's data-breach procedure.

21 Incident management learning and external reporting

Following immediate action and referral, the DSO and an unconflicted senior lead will coordinate welfare support, communications, operational decisions and records. Public statements and media responses must protect privacy and must not prejudice an investigation.

- The trustees decide, with professional advice where needed, whether the matter is a serious incident reportable to the Charity Commission. A police or local-authority referral does not replace this consideration.
- The DSO or senior lead considers notifications required by the DBS, ICO, insurer, commissioning authority, funder, venue or professional regulator.
- After the matter is stable, Protein reviews what happened, including culture, systems, equality and access factors, and records actions, owners and deadlines.
- Learning is shared in an anonymised form. Policies, risk assessments, training or supervision are updated without waiting for the annual review where necessary.
- People affected are offered appropriate information and support, subject to confidentiality and legal restrictions.

22 Training induction and assurance

Group	Minimum safeguarding expectation
Trustees	Induction; charity safeguarding governance; annual discussion and check at board meeting; understanding of serious-incident reporting and Board oversight.
DSO and Deputy	Role-specific child and adult safeguarding training; local referral procedures; regular refresher and continuing professional development. Face to face training every 3 years or every 2 years on line
Employees and regular freelancers	Safeguarding induction before all projects; policy and code declaration; role-appropriate child/adult training; Artistic Director face to face training every 3 years or every 2 years on line
Short-term artists volunteers and placements	Proportionate induction before activity; reporting route, boundaries, safe touch, online and project-specific risks; supervision as required.
Photographers filmmakers and digital workers	Consent, image safety, data handling, online risk and contractual restrictions.
Project and partner leads	Written allocation of responsibilities, local contacts, risk assessment and incident coordination.

Protein keeps a training and checks register and monitors completion. The Board receives anonymised assurance on training, DBS and safer-recruitment compliance, incidents, themes, outstanding actions and policy review. Quality is assessed through participant feedback, supervision, spot checks, partner review and learning from concerns—not through completion figures alone.

23 Policy review

The Board will review this policy at least annually and sooner after a serious incident or near miss, a significant complaint, a change in law or statutory guidance, a new area of work, or a material change in Protein's structure or delivery. Contact details must be checked at every review and before circulation for a project.

Appendix 1 Categories and possible indicators of abuse

The following list is not exhaustive and several forms of abuse may occur together.

Category	Examples
Physical abuse	Assault, hitting, shaking, inappropriate restraint, fabricated or induced illness, misuse of medication.
Sexual abuse and exploitation	Sexual contact or activity without consent, grooming, sexual harassment, exposure to sexual material, exploitation or trafficking.
Emotional or psychological abuse	Threats, humiliation, intimidation, coercion, isolation, controlling behaviour, persistent rejection or exposure to domestic abuse.
Neglect and acts of omission	Failure to meet medical, physical, emotional, nutritional, access or supervisory needs; unsafe care; withholding essentials.
Financial or material abuse	Theft, fraud, coercion over money, benefits or property, misuse of accounts or possessions.
Discriminatory abuse	Harassment, slurs, unequal or degrading treatment connected to disability, race, religion, sex, sexual orientation, gender reassignment, age or another characteristic.
Organisational abuse	Unsafe, rigid or degrading practices, poor leadership, cultures that discourage reporting, repeated failures of care or accountability.
Domestic abuse	Physical, sexual, emotional, economic, coercive or controlling abuse between partners or family members, including honour-based abuse, forced marriage and female genital mutilation.
Modern slavery	Human trafficking, forced labour, servitude, criminal or sexual exploitation.
Self-neglect	Serious neglect of personal care, health, environment or safety by an adult, including hoarding, where statutory adult-safeguarding criteria may be met.
Online abuse	Grooming, coercion, sexual imagery, cyberbullying, impersonation, harassment, exploitation or exposure to harmful content.

Child-on-child abuse	Bullying, sexual violence or harassment, coercive behaviour, abuse within relationships, initiation violence or online abuse between children.
Radicalisation	Grooming or influence drawing a person towards violent extremism or terrorism.
Spiritual or faith-related abuse	Using beliefs, accusations or practices to frighten, control, punish or exploit a person.

Possible indicators

- unexplained, repeated or untreated injuries; inconsistent explanations; flinching or fear of a particular person;
- marked change in behaviour, communication, attendance, mood, confidence, appearance or engagement;
- sexualised language or behaviour inappropriate to age or development; pregnancy or sexually transmitted infection; unexplained gifts or money;
- hunger, poor hygiene, unsuitable clothing, persistent tiredness, untreated health needs or lack of necessary support;
- withdrawal, distress, aggression, self-harm, suicidal thoughts, substance misuse or fear of going home;
- another person controlling communication, identification, money, movement or decisions; signs of trafficking or labour exploitation;
- for a disabled person: unexplained equipment injuries, poor toileting or feeding support, unnecessary restraint, communication needs ignored, or care provided against their will;
- unsafe online contact, secrecy about a relationship, threats involving images or sudden changes in device use; and
- a disclosure, partial disclosure, hint, drawing, comment or concern expressed by the person or someone else.

An indicator is a reason to be attentive and report—not proof. Immediate danger always takes priority.

Appendix 2 Immediate response guide

Step	What to do
1 Make safe	If there is immediate danger, serious injury or a crime in progress, call 999. Give first aid within your competence and preserve evidence.
2 Listen	Stay calm. Believe and reassure. Do not investigate, lead, confront or promise secrecy.
3 Report	Contact the Protein DSO immediately. Use the alternative route if they are implicated, absent or unresponsive. Contact statutory services directly if delay creates risk.
4 Record	Write facts and the person's own words as soon as possible. Date, time and sign the record. Do not edit the original.
5 Refer	The DSO consults or refers to children's social care, adult social care, LADO or police as appropriate and records the decision.
6 Support and review	Protect confidentiality, coordinate support, consider regulatory notifications and learn from the incident.

Do not wait for proof. Do not assume someone else has reported. Do not allow a partner disagreement to delay protection.

Appendix 3 Key contacts

Contact details must be verified at policy approval and before each project. For activity outside Greenwich, the project plan must add the relevant local authority contacts.

Service	Contact
Emergency services	999. For non-emergency police matters: 101.
Protein office	0330 500 2020
Protein DSO	Caron Loudy, Executive Producer | 07711 140432 | caron@proteindance.co.uk
Protein Deputy DSO	Michael Johnson, Producer | 07879 635062 | michael@proteindance.co.uk
Protein Board safeguarding lead	Rachel Elliott
Royal Greenwich children's MASH	020 8921 3172 | mash-referrals@royalgreenwich.gov.uk

Royal Greenwich out-of-hours service	020 8854 8888
Royal Greenwich LADO	Use the current Royal Greenwich LADO referral route; verify and insert direct contact details before approval.
Royal Greenwich adult safeguarding	020 8921 2304 during published office hours | aops.contact.officers@royalgreenwich.gov.uk | out of hours 020 8854 8888
NSPCC helpline	0808 800 5000 | help@nspcc.org.uk
Childline	0800 1111
Charity Commission whistleblowing	Use the current GOV.UK "Report serious wrongdoing at a charity as a worker or volunteer" service.

Appendix 4 Safeguarding concern record

Complete as soon as possible. Record facts, not assumptions. Send securely to the DSO and do not retain an unauthorised copy.

Record completed by	
Role and contact details	
Date and time completed	
Person concerned name or reference	
Age or date of birth if known	
Communication access or support needs	
Date time and location of concern	

People present	
What I saw heard or was told including exact words	
Open questions asked and responses	
Immediate safety or medical action taken	
Who I reported to date and time	
Advice received and referrals made	
Parent carer or partner informed and why	
Documents messages images or evidence secured	
Further actions owner and deadline	
Signature and date	

Appendix 5 Project safeguarding checklist

Complete before activity begins and review whenever arrangements or risks change. Record supporting evidence, outstanding actions and the person responsible. Any outstanding action needed to keep people safe must be resolved before delivery.

Project: _____
Project lead: _____
Venue/location: _____
Dates: _____
Checklist completed by/date: _____

Complete	Check	Evidence, outstanding action and person responsible
☐	Named Protein and partner safeguarding contacts confirmed, including cover during absence, and shared with everyone delivering the project.	
☐	Safeguarding risk assessment completed, covering the participant group, individual needs and foreseeable risks.	
☐	Staffing, supervision, one-to-one working and transfers of responsibility agreed.	
☐	DBS eligibility assessed and required safer-recruitment checks completed and recorded.	
☐	Staff, artists and volunteers briefed on safeguarding, professional boundaries and reporting procedures; declarations recorded.	
☐	Venue, accessibility, toilets, changing areas, backstage access and contact with the public assessed.	
☐	Participant consent, emergency contacts, medical, access and communication information collected lawfully and available to authorised staff.	
☐	Arrival and departure arrangements agreed, including registration, attendance records, authorised collectors and verification of collection changes.	
☐	Any independent departure agreed in advance, with written parent/carer permission and an appropriate risk assessment.	
☐	Late or non-collection procedure agreed, including safe supervision, emergency contacts and escalation to the DSO and children's social care.	
☐	Missing-child procedure agreed and staff briefed on immediate action, coordinated checks, supervision of other children, parent/carer notification and prompt police contact.	

☐	Transport, off-site activity and any overnight arrangements assessed, with clear responsibility for supervision and handovers.	
☐	Where children perform or are filmed, licensing requirements checked with the relevant authority; required licences, approvals or the documented basis for exemptions in place.	
☐	Where chaperones are required, local-authority approval, identity and restrictions verified; adequate cover and clear welfare responsibilities agreed.	
☐	Child performance schedules and facilities meet applicable requirements for hours, breaks, education, changing, rest, travel and accommodation; required records arranged.	
☐	Children's participation explained accessibly, with opportunities to raise concerns, request breaks or stop without pressure.	
☐	Harassment risks to staff, artists and volunteers assessed, including contact with participants, audiences, visitors and partners, lone working and online contact.	
☐	Behaviour expectations communicated; venue and partner responsibilities for responding to harassment, security support and removal agreed.	
☐	Workers know how to report harassment, pause activity or withdraw to safety; arrangements for prompt action, support and protection from retaliation confirmed.	
☐	Safe-touch approach, consent and no-touch alternatives explained.	
☐	Photography, filming, consent, publication and secure image-storage arrangements agreed.	
☐	Online platforms, communication channels and digital safeguarding arrangements approved.	
☐	First aid, emergency procedures and incident-reporting arrangements confirmed.	
☐	Partner responsibilities, information-sharing arrangements and external referral routes documented; relevant local contact details checked.	
☐	Accessible reporting routes, interpretation and advocacy options explained to participants and workers.	
☐	Review points and a post-project learning discussion scheduled, including incidents, near misses and participant and worker feedback.	

Outstanding actions resolved and project authorised to proceed by:
Name: _____
Date: _____

If anyone is in immediate danger, call 999. Do not delay action while trying to contact a manager.

Appendix 6 Declaration

I confirm that I have read and understood Luca Silvestrini's Protein's Safeguarding Policy, Procedures and Code of Conduct. I will follow it throughout my work with Protein, maintain professional boundaries and report concerns promptly. I understand that safeguarding requirements, safer-recruitment checks and supervision will be proportionate to my role.

Name _____

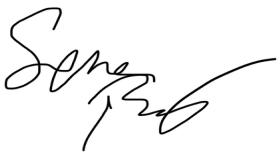
Role _____

Signature _____

Date _____

Board approval

Approved by the Board of Trustees on 24 September 2026



Chair signature

Next review due 24 September 2027