

BRASSNECK

THEATRE COMPANY

Children and Adults at Risk Protection Policy

Updated on 17th January 2024
Approved by Board of Trustees on 23rd January 2024

SIGNED: *M McCourt*

DATE: 23/01/2024

STATEMENT OF INTENT

Brassneck Theatre Company are committed to safeguarding the welfare of adults at risk, children and young people, and recognise our responsibility to take all reasonable steps to promote safe practice and to protect adults at risk and children from harm, abuse and exploitation. Brassneck Theatre Company believe that the welfare of the adult at risk and child is paramount, and that all adults at risk and children without exception have the right to protection from abuse.

This policy has been approved and endorsed by senior management and the Board of Trustees.

PRINCIPLES OF GOOD PRACTICE

At all times, Brassneck Theatre Company will:

- Treat adults at risk, children and young people with care, respect and dignity
- Put the welfare of adults at risk and children at the heart of all our work
- Ensure communication with adults at risk, children and young people is open and clear
- Assess the risks to adults at risk and children of its activities
- Recognise adults at risk' and children's rights as individuals and accord them the respect they deserve by considering, listening to, acknowledging and valuing their opinions and needs
- Train all staff in adult at risk and child protection issues
- Review its policy and procedures regularly

Code of Conduct

All Brassneck Theatre Company staff must sign up to and abide by the Code of Conduct attached to this Policy. The induction of staff will include detailed discussion of the requirements of this Code.

Any breach of the code of conduct will result in relevant disciplinary action.

Recruitment and Induction of Staff

Brassneck Theatre Company is committed to equality and fair treatment of all core staff, freelance employees and potential candidates for posts within the company. Brassneck Theatre Company is also committed to ensuring that the welfare of children and adults at risk is of paramount consideration and that company recruitment systems do not increase or ignore the potential risk of harm to the children and/or adults at risk with whom Brassneck Theatre Company works nor do they compromise or put at risk individual staff members or candidates.

Brassneck Theatre Company is currently a registered body with Access NI, and requires enhanced disclosures from all staff that have regular contact with children and adults at risk. As part of Brassneck's recruitment and selection process, offers of employment to positions where working with adults at risk, children and young people is an expected part of the job will be subject to an Access NI check. This applies to persons engaged on staff, casual or freelance contracts.

A detailed operational document on recruitment and selection is attached.

Induction and Training

Core Staff

Training on child protection and adults at risk will form part of the company induction programme, and will then be updated on an annual basis, or as updates are required.

Induction for Project-based Employees

For all staff employed on project-based contracts, a practical induction session of not less than one hour with written guidelines will be a compulsory element of the preparation period of any project. The content will cover all aspects of the company's policy and procedures and will have additional elements depending on the nature of the activity to take place. The practical advice and written guidelines will be reviewed and updated regularly in accordance with changes in legislation and best practice.

Use of photographic/filming equipment

Brassneck Theatre Company will request all relevant consent in advance of any filming or photography and will adhere to the following guidelines:

- Will provide a clear brief about appropriate content and use of image
- Identify photographer to host group
- Will not permit unsupervised access to children
- Avoid using names of children if image is used

All consent forms will be stored in line with data protection legislation.

Reporting Systems

Brassneck Theatre Company is aware of the importance of responding to, reporting and recording concerns, allegations and disclosures and following the correct reporting processes to support any investigation.

This is highlighted by

- Providing guidelines as to what constitutes a child protection concern
- Providing guidelines about how to respond to such concerns
- Implementing a procedure for recording and reporting information in a confidential manner
- Implementing a Dignity at Work policy which is inclusive of adults at risk
- Appointing Designated Persons to deal with safeguarding issues

Designated Persons

The Designated Persons will be

- Child Protection Officer: Alison McCrudden (Youth Company Co-ordinator) – alison@brassnecktheatrecompany.com
- Adult Safeguarding Champion: Lyndsay Campbell (General Manager) – lyndsay@brassnecktheatrecompany.com
- Chairperson: Maria McCourt – mariainoz@hotmail.com

Their role is to:

- Be the first person who staff, volunteers or members of the public approach with concerns
- Train all stakeholders in the safeguarding policy
- Ensure that safeguarding policy and procedures are being implemented
- Contact statutory organisations about concerns and make referrals if necessary

What constitutes a child protection concern?

A concern which relates to the possibility of a child suffering harm or abuse. The most likely examples of this in the context of Brassneck Theatre Company activities are:

- Worrying remarks made by a child
- Situations where a child has been exposed to potential risk of harm
- Concern about the behaviour of a worker (e.g. inappropriate or unacceptable behaviour, negligence or favouritism)
- Disclosures –when a child tells you that they are/have been harmed or abused in any way

Responding to concerns

It is not Brassneck's responsibility to investigate any concern or decide whether or not it constitutes abuse. Employees simply need to ensure that all information is passed to the Designated Person/Child protection Officer/Adult Safeguarding Champion without delay.

All concerns should be recorded, no matter how insignificant the information may seem.

In the case of a **child** disclosing abuse, Brassneck Theatre Company employees should:

- Follow recommended practice re dealing with disclosures detailed in induction process
- Find designated Child Protection Officer and report concern
- Complete report form: form should then be copied leaving one with Child Protection Officer and retaining one
- Notify Brassneck Theatre Company Designated Officer at earliest opportunity
- All records will be held confidentially and supplied for any further investigation
- Employees will be supported in any investigation even after their contract of employment has ended

Should the Child Protection Officer of the host organisation not be available:

- Employees should notify another Designated Person immediately who will then follow up with the Child Protection Officer when available, or email the CPO. Employees will need to make themselves available should a meeting be required

In the case of an **adult at risk** disclosing abuse, Brassneck Theatre Company employees should:

- Follow recommended practice re dealing with disclosures detailed in induction process
- Find Adult Safeguarding Champion and report concern
- Complete report form: form should then be copied leaving one with ASC and retaining one
- Notify Brassneck Theatre Company Designated Officer at earliest opportunity
- All records will be held confidentially and supplied for any further investigation
- Employees will be supported in any investigation even after their contract of employment has ended

Should the ASC of the host organisation not be available:

- Employees should notify another Designated Person or contact the ASC by email and follow up in person when available. Employees will need to make themselves available should a meeting be required

In the case of an allegation made against a Brassneck Theatre Company employee:

1. Whether the allegation comes from a child or a member of staff, the CPO/ASC will be responsible for notifying the authorities and initiating the appropriate procedures. The adult reporting the allegation will also be responsible for notifying Brassneck's CPO/ASC at the earliest opportunity.
2. Where an allegation is made from within Brassneck Theatre Company or to a Brassneck Theatre Company employee about a colleague, the CPO/ASC will be responsible for notifying the authorities.
3. Any employee against whom an allegation is made will be suspended by Brassneck Theatre Company on full pay for the duration of their contract or until such time as the investigation is complete. Allegations made against core staff should be notified to Brassneck's Board of Directors through the Chair.

In all cases:

1. Brassneck Theatre Company will take steps if appropriate, to notify the appropriate authorities, i.e. the police or social services.
2. Brassneck's Board of Directors will be notified when an incident has taken place.

COMMUNICATION OF THE POLICY

Brassneck Theatre Company is committed to promoting awareness of issues that may cause harm to children and adults at risk and raising understanding of their rights as individuals. Brassneck Theatre Company is also committed to promoting good practice generating a culture of 'openness' within its own work and in a wider context.

Brassneck Theatre Company will communicate its policy practically, publicly and in the promotion of good practice.

Practical Communication

Brassneck Theatre Company will draw attention to its policy in its literature and guidelines sent to host schools/organisations. It will make them aware of its reporting and complaints procedures and gather information on their policies. Where appropriate, it will provide supplementary information for distribution to parents and carers. Host organisations such as theatres will be notified of the policy and where appropriate will be provided with notices for display and other relevant literature.

Public Communication

Brassneck Theatre Company will make its safeguarding policy and procedures available on demand. Where appropriate, it will carry literature relating to its policy for distribution to members of the public. It will also be open to enquiries, concerns and complaints about issues relating to safeguarding. It will gather information about practices engaged by other organisations and will contribute to wider debates about training and appropriate behaviour.

Promotion of Good Practice

Brassneck Theatre Company will make the welfare of the child and adult at risk a paramount consideration in all areas of its work. It will stipulate that its host schools/organisations must have in place mechanisms and procedures relating to safeguarding.

Management and Monitoring

Brassneck Theatre Company is committed to managing the implementation of this policy in full and ensuring that it is reviewed regularly and amended as necessary.

Responsibility for Management

Final responsibility of the policy will rest with the Board of Directors of Brassneck Theatre Company Productions. The daily and ongoing management of the policy will be undertaken by the General Manager taking a lead role in record-keeping and implementation of procedures. All other employees regardless of their length of contract or duties will have a responsibility to adhere to the organisation's adult at risk and child protection policy and follow all procedures as required.

Monitoring

- Brassneck Theatre Company will monitor its recruitment, selection and vetting procedures to ensure potential candidates are compliant with the requirements of this policy
- Induction and training will be recorded for all staff and with each new intake of project-based staff. Brassneck Theatre Company will keep a record of those employees who return for subsequent contracts and provide references as appropriate
- Brassneck Theatre Company will keep detailed and accurate records of any reported incidents, allegations or concerns and comply with all requirements to supply information as appropriate in line with data protection legislation
- Brassneck Theatre Company will be pro-active in gathering information on changes in law and practice and disseminate these/review procedures as appropriate
- Brassneck Theatre Company will retain all relevant records and will hold confidentiality as a primary consideration.
- Brassneck Theatre Company Board of Directors will make spot checks to ensure all procedures are being fully implemented

Review

Brassneck Theatre Company will review its policy annually alongside other company policies. This will be undertaken at Board level. The review will take into consideration:

- Any issues that have arisen during the year from the implementation of the policy
- Any incidents reported and their implications for changes to be made
- Comments and suggestions from any source
- Changes in legal responsibility or recommended practice
- Issues arising from outside the sphere of child protection (e.g. changes in other legislation)

Any amendments required to policy and procedures will be discussed and approved at a Board meeting.

Code of Behaviour

This document outlines how Brassneck Theatre Company expects its employees to behave when representing the company. While it does not cover every possible situation that might arise, it will help employees use their judgement, to act and respond appropriately and avoid situations that are risky, inappropriate or open to misinterpretation.

Workshop facilitators will need to be particularly sensitive to how their behaviour impacts on children and adults at risk. All guidance should be applied before and after activities as well as during.

Any breach of the Code of Conduct will result in disciplinary procedures.

DO:

- Show respect, be patient and listen
- Set a good example by using appropriate language, attitude and demeanour at all times
- Wear Brassneck Theatre Company branded clothing
- Conduct activities within sight or hearing of others. Where possible involve more than one child in a conversation
- Listen to the host group staff as they will have a longer and more complex relationship with the children.
- Stop or cancel activities if conditions are unsafe or unreasonable demands are being made

- Work out or consult with Brassneck Theatre Company in advance to agree appropriate discussion topics and exit strategies, if an activity has a particularly sensitive or emotional content. Brassneck Theatre Company will always provide host groups with resources and guidance for pre-work and follow-up
- Keep physical contact to an appropriate level. What that level is in relation to a specific activity should be discussed with the company beforehand and then with the lead contact person in the host organisation. Be prepared to adjust the activity to allow for changing circumstances
- Avoid excessive physical contact with children and adults at risk and refrain from activities such as wrestling or tickling. Ask the child if a particular physical activity is okay
- Identify a lead contact in each host group and the lead contact person from Brassneck, in most cases the Company Stage Manager. Make sure everyone including the children knows who they are
- Be aware of child safety when arriving at the venue. Be prepared to have other employees walking in front of, behind or beside the vehicle, particularly if the vehicle must cross a playground. Keep vehicles locked at all times
- Stay in prescribed areas and avoid wandering around the facilities
- Use staff not children's toilets and always ask for a private changing area. If neither is available, establish a system with the host group to make them 'out of bounds' while Brassneck Theatre Company is using them
- Be as careful leaving as arriving
- Secure equipment of any kind that could be used unsafely or as a weapon (scissors, staple guns, penknives, etc) must be kept away from children and used by them only under supervision
- Be open to and aware of diversity in the beliefs and practices of individuals and their families
- Ask how an individual's care should be delivered, having regard to the cultural needs of others
- Be aware of the difficulties posed by language barriers and other communication difficulties

Never:

- Work or perform without supervisory staff/volunteers present. The host organisation is responsible for supervising children and no Brassneck Theatre Company employees – individually or together – should be left alone with children for any length of time.
- Hit or physically assault or abuse children or adults at risk
- Discriminate against individuals and their families who have different cultural backgrounds and beliefs from their own
- Show favouritism towards a child
- Comment on personal appearance or dress
- Promise to keep secrets
- Belittle or demean children or adults at risk
- Embarrass, ignore or single out a child or adult at risk
- Allow or engage in inappropriate touching
- Engage in sexually provocative games
- Allow children or adults to engage in abusive peer activities, e.g. bullying, mocking or initiation ceremonies
- Offer lifts to children or permit them to travel in the company vehicle
- Arrange meetings with children outside organised activities without the prior consent of parents and Brassneck
- Bring any alcohol into a host organisation, even for consumption during non- working hours
- Turn up for work smelling of alcohol
- Smoke inside school grounds, or in the presence of children or young people
- Bring any type of prescription drugs into a host organisation, unless medically necessary. If necessary (e.g. inhaler , epi –pen) ensure they are kept on your person at all times, or with the host organisation
- Bring items of value should be left at home or given to the Company Stage Manager or host group during activities. Mobiles must be switched off during all activities
- Swearing and having conversations of an adult nature should be avoided while in the host organisation. Many schools and groups have 'no swearing' policies which Brassneck Theatre Company must respect

- Never undermine, ridicule or insult the staff or volunteers of a host group
- Offer alcohol, cigarettes or drugs (even headache tablets) to a child or adult at risk

Recruitment

Brassneck's recruitment and selection procedures will help organisations to screen out unsuitable individuals and prevent them from working with children or adults at risk.

In the pursuit of best practice, some of Brassneck's procedures go beyond the legislative requirement.

Brassneck Theatre Company can identify 4 groups of potential employment or involvement:

1. Core permanent and/or senior staff (both full-time and part-time)

All core staff must be subject to some level of vetting. The level of vetting is detailed below.

Artistic Director – as the AD will be required to work in schools with children or young people and may have prolonged residences, this post is subject to an Enhanced disclosure

Youth Company Coordinator – as the Designated Officer for child protection issues, this post is subject to an Enhanced Disclosure.

General Manager

Although there may be minimal contact with children and young people, this post will have some infrequent contact e.g. attendance of performances and workshops. As a matter of best practice, this post should be subject to standard disclosures.

NB: With the introduction on VBS in October 2009, the standard disclosure will become obsolete. Those working with children will require an enhanced disclosure and also registration with the ISA (at a cost to the individual of around £60). The legislation currently requires registration only if the contact with children in regular (once a month) or intensive (3 days a week). Under these guidelines neither AO nor DM posts would require registration and checks.

However, as a matter of good practice, it is recommended that registration be required.

The legislation is currently under review, and final decision should be postponed until clarification has been given

2. Freelance staff – performance based

As performances take place within schools, an enhanced disclosure is required for each contract issued.

3. Freelance staff – workshop based

As performances take place within schools, an enhanced disclosure is required for each contract issued.

In addition, references must be taken up prior to appointment

4. Board of Directors

As the people ultimately responsible for the child protection policy, it is recommended that all voluntary board members should also undergo a standard disclosure.

Brassneck Theatre Company will put in place the following step-by-step system to secure and monitor its recruitment system:

- Job descriptions will be provided for all posts, giving details of level of disclosure required
- Any person applying for a post working with children or adults at risk must complete an application form

- Obtain 2 written references
- Complete relevant Access NI checks
- Obtain 2 forms of identification
- Set a probationary period (if applicable)
- Interview candidates (if applicable)
- Sign written agreement to abide by Code of Conduct
- Ensure all new recruits undergo an induction process and are familiar with safeguarding policy and procedures.
- New recruits sign a declaration form requesting information on previous convictions
- There is a robust structure and process for support and supervision for all staff and volunteers, appropriate to the post/role.

For detailed information on vetting checks, please see Appendix A

Appendix A

Guidance on vetting systems

AccessNI

AccessNI is the system for the disclosure of an individual's criminal history to help organisations make safer recruitment decisions. It was established in April 2008 by the Northern Ireland Office as a result of the introduction in Northern Ireland of Part V of the Police Act 1997. Since then AccessNI has moved under Department of Justice. Registered bodies can process applications for standard and enhanced disclosure checks. Typically a Registered Body will be an employer seeking disclosures as part of the recruitment process. Registered Bodies must submit over 20 applications a year to maintain their status.

To become a Registered Body, an appropriate person, such as a senior staff member within the organisation, must register with AccessNI. The cost of registration is £150. Once registered the Lead Signatory may appoint Counter Signatories to assist in applying for and receiving disclosure certificates. A charge of £10 will be made for each Counter Signatory application. Signatories must be over 18 years of age. Any organisation wishing to nominate a signatory under 18 must contact AccessNI before attempting to register them.

Organisations who are not Registered Bodies can use the services of an organisation which has already registered with AccessNI and can deliver all of the necessary services on their behalf - an Umbrella Body. Full details of Umbrella Bodies and any costs are available on the AccessNI website.

Age of applicants

AccessNI will not accept applications for Basic, Standard or Enhanced checks where the individual is not aged 16 or over on the day the application was submitted. The only exception to this is where the applicant is seeking an Enhanced check and he/she is a member of a family, where an adult in that family is a registered childminder or is seeking to foster or adopt a child; or is living or working at the same premises where the childminding, fostering or adoption is to take place. In such circumstances, applications will continue to be processed provided the applicant is over 10 years of age.

Levels of AccessNI checks

There are different levels of disclosure certificates available through AccessNI, each returning different levels of information. Individuals can apply directly to AccessNI using the appropriate application form to obtain a Basic Disclosure. Standard and Enhanced Disclosures can only be accessed through Registered/Umbrella Bodies.

Information Disclosed

A Basic Disclosure Certificate contains details of all unspent convictions, or will state that no such convictions were found. Standard and Enhanced Disclosures contain spent and unspent convictions including informed warnings, cautions and diversionary youth conferences (all subject to filtering – see below). Where appropriate, Enhanced Disclosures will also contain Barred List information and/or additional police information.

A summary is set out below:

	Unspent Convictions	Spent*	Barred lists	Relevant Police Information
Basic	Yes	No	No	No
Standard	Yes	Yes	No	No
Enhanced	Yes	Yes	Yes**	Yes

*includes informed warnings, cautions, details of diversionary youth conferences and convictions.

**applies to regulated activity

Filtering

Filtering is the term given to the non-disclosure of information on certificates which is considered to be old and/or minor. From 2014 old and minor offences are removed or 'filtered' from Standard and Enhanced Disclosure checks. This means they won't appear on the disclosure certificate and the applicant does not have to tell a prospective employer about these offences. These offences which can be filtered are known as 'protected'.

AccessNI will apply the following rules to information held in central records, on any individual:

- Any conviction or caution, diversionary youth conference or informed warning for a specified offence will not be filtered;
- Any conviction resulting in a custodial sentence (including suspended sentences), regardless of offence, will not be filtered;
- A conviction will only be filtered if there is no other conviction on the individual's record;
- A conviction for a non-specified offence for an adult will be filtered after a period of 11 years and 51/2 years for those under 18 at the time of the conviction;
- Other cautions will be filtered after a period of 6 years for adults;
- Other cautions (including restorative cautions) and diversionary youth conferences will be filtered after 2 years for those under 18 at the date of the caution;
- Other informed warnings will be filtered after 1 year.

Some types of offences will always be disclosed including those which are serious, relate to sexual or violent offending or are relevant in the context of safeguarding. These are known as 'specified offences'. It would never be appropriate to filter such offences regardless of when they took place. A full list of specified offences is available on the AccessNI website

www.nidirect.gov.uk/sites/default/files/publications/List%20of%20Specified%20Offences%20.pdf

Note:

For Enhanced Disclosures only, the Police may decide to include information about cautions and/or convictions that have been filtered by AccessNI on the basis that they 'reasonably believe to be relevant and ought to be disclosed'. If this is applied, the information will appear in the Police information section of the certificate rather than in the convictions section.

Organisations may now only ask applicants for details of convictions and information that is not subject to filtering.

For further information about informed warnings, cautions and details of diversionary youth conferences visit the Department of Justice Northern Ireland website.

Cost

Registered bodies can apply for the appropriate disclosure using the AccessNI application form. The following charges apply.

Basic Disclosure £26

Standard Disclosure £26

Enhanced Disclosure £33

Checks for volunteers

Checks for volunteers are FREE except where the volunteering is directly for a statutory organisation or where a non-profit organisation is delivering statutory services under contract or in a specific project for which that organisation has received funding from Government which includes provisions covering the costs of Standard and Enhanced Disclosures for volunteers.

Process

AccessNI now operates an online application system, ensuring a more effective and efficient process. Organisations will have a PIN number for an AccessNI counter signatory, whether as a registered body or when using the service through an Umbrella Body. This PIN number should be provided to each new applicant so they can use the AccessNI online facility to apply for their disclosure check.

Following the guidance on the AccessNI website, applicants will create an online account and submit their disclosure application online to the identified counter signatory. Organisations should ensure they are available to provide support to the applicant during this process if required.

Once the application is received and processed by the counter signatory, it will be forwarded to AccessNI to process, and issue a disclosure certificate. During this time the applicant can track the progress of their application by logging into their account.

Since 2 November 2015 AccessNI no longer issues a copy of the disclosure certificate to the Registered/Umbrella Body. Organisations should ensure they request the disclosure certificate to be produced once the applicant has received it.

Registered Bodies that process and countersign applications online will be able to use the case-tracking service to determine when a certificate has been issued to the applicant. In addition, if the 'status' box on the case tracking tool states 'Certificate Issued (N)' this means that no information has been disclosed on that certificate. The Registered Body can then take the appropriate recruitment decision in the knowledge there is no criminal record or other information on the certificate. If the annotation '(N)' is not in the case tracking status, (i.e. it simply shows 'Certificate Issued') the organisation will have to request the disclosure certificate to be produced once the applicant has received it. A sample request letter can be found on the AccessNI website.

Appeal

Under the Justice Act (NI) 2015, an applicant can ask the Independent Monitor (IM) to review police information on their enhanced certificate where they believe it is inaccurate or is not relevant for the purpose for which the certificate was sought (i.e. the type of work set out on the application) or it ought not to have been included on the certificate. Applicants are required to complete the new Certificate Dispute Form available on the AccessNI website. AccessNI will continue to inform Registered Bodies if an individual has sought such an appeal, but only where the applicant has given permission on their form for AccessNI to do so.

Portable Disclosure Service

AccessNI is working to develop and deliver a new Portable Disclosure Service. The service will allow individuals to apply for a criminal record check which can be reused in future when applying for a similar role.

Further information is available on the AccessNI website www.nidirect.gov.uk/accessni

Appendix B

Useful Contacts

ACE (Advisory Centre for Education) Advice on bullying	www.ace-ed.org.uk Helpline 0808 800 5793
Anti-bullying Alliance	www.antibullyingalliance.org
Behaviour Management	www.parenting-ed.org
Bullying Good advice for children on bullying is outlined here - how to recognise it, and what to do if you are the victim or know of someone who is. For those unwilling to tell anybody, help is available on the site via email.	www.bullying.co.uk

Child Exploitation Online Protection	www.ceop.gov.uk
Child Protection in Sport Unit (CPSU) Newsletter email “subscribe” to cpsu@nspcc.org.uk	pstephenson@nspcc.org.uk www.thecpsu.org.uk 028 90351135
Childline Northern Ireland Got a problem? Childline has helped hundreds of thousands of children in trouble or danger. If you feel you can't face ringing them, check out their website. There are fact sheets on many subjects including bullying.	www.childline.org.uk Helpline 0800 11 11 1st Floor, Queens House , 14 Queen Street, Belfast BT1 6ED. Tel: 0870 336 2945
Children’s Law Centre	www.childrenslawacentre.org Philips House, York St, Belfast, BT15 1AB CHALKY Helpline 0808 808 5678
Counselling for young people	www.contactyouth.org
Department Of Culture Arts and Leisure	www.dcalni.gov.uk
Domestic Violence	www.womensaid.org.uk
Drugs and alcohol	www.contactyouth.org
Health	www.kidsallergies.co.uk
Health and Social Care Trust Gateway Teams Belfast HSC Trust Gateway Team Northern HSC Trust Gateway Team South-Eastern HSC Trust Gateway Team Southern HSC Trust Western HSC Trust Out of Hours Contact There will be a recorded message at each of the above numbers which will provide Emergency Out of Hours numbers.	028 9050 7000 028 7032 5462 028 9334 0165 0800 783 7745 028 7131 4090
Internet Safety	www.iwf.org.uk
Kidscape Open Monday to Friday between 10am and 4pm. Nearly everyone is bullied at some time in their lives according to this charity. It offers information and support to young people and their parents.	www.kidscape.org.uk 020 7730 3300
National Children’s Bureau	www.ncb.org.uk
NI Anti-Bullying Forum	www.niabf.org.uk

NI Commissioner for Children & Young People	www.niccy.org
NSPCC Child Protection Helpline	www.nspcc.org.uk Helpline 0808 800 5000
Parentline Plus Advice for parents on supporting a child who is being bullied.	www.parentlineplus.org.uk Freephone 0808 800 2222
Parents Advice Centre Parenting Education Project, Parenting Forum NI and The Men's Project -	www.parentsadvicecentre.org Freephone 0808 8010 722
Parents Centre	www.parentscentre.gov.uk
Special Education Needs	www.throughtheroof.org
Sport Northern Ireland	www.sportni.net Tel: 028 90381222
Suicide and self-harm	www.pipsproject.com www.samaritans.org
There4Me NSPCC On line advice service for 11- 16 year olds	www.there4me.org.uk
Volunteer Development Agency 028 90236100	For further information on developing Safeguarding policy and procedures are provided in the documents Our Duty to Care and Getting it Right available at www.volunteering-ni.org

Appendix C

Recognition of Abuse and Poor Practice

What is Abuse?

Abuse is a 'single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights'. 6

Abuse is the misuse of power and control that one person has over another. It can involve direct and indirect contact and can include online abuse.

Child Abuse is defined as falling into the following five categories:

- Physical:** Physical abuse is the deliberate physical injury to a child, or the wilful or neglectful failure to prevent physical injury or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room or cot, or inappropriately giving drugs to control behaviour.
- Neglect:** Neglect is the persistent failure to meet a child's physical, emotional and/or psychological needs, likely to result in significant harm. It may involve a parent or carer failing to provide adequate foods, shelter and clothing, failing to protect a child from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation or lack of supervision. It may also include non-organic failure to thrive (faltering growth).
- Sexual:** Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at or the production of pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- Emotional:** Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Smothering a child's development through over-protection can also be a form of abuse. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone. Domestic violence, adult mental health problems and parental substance misuse may expose children to emotional abuse.

Exploitation: Exploitation is the intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.

“Adult Safeguarding: Prevention and Protection in Partnership” (DOH and DOJ, July 2015) outlines the main forms of abuse:

Physical abuse is the use of physical force or mistreatment of one person by another which may or may not result in actual physical injury. This may include hitting, pushing, rough handling, exposure to heat or cold, force feeding, improper administration of medication, denial of treatment, misuse or illegal use of restraint and deprivation of liberty. Female Genital Mutilation (FGM) is considered a form of physical AND sexual abuse.

Sexual violence and abuse is ‘any behaviour (physical, psychological, verbal, virtual/online) perceived to be of a sexual nature which is controlling, coercive, exploitative, harmful, or unwanted that is inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability). Sexual violence and abuse can take many forms and may include non-contact sexual activities, such as indecent exposure, stalking, grooming, being made to look at or be involved in the production of sexually abusive material, or being made to watch sexual activities. It may involve physical contact, including but not limited to non-consensual penetrative sexual activities or non- penetrative sexual activities, such as intentional touching (known as groping). Sexual violence can be found across all sections of society, irrelevant of gender, age, ability, religion, race, ethnicity, personal circumstances, financial background or sexual orientation.

Psychological/emotional abuse is behaviour that is psychologically harmful or inflicts mental distress by threat, humiliation, or other verbal/non-verbal conduct. This may include threats, humiliation or ridicule, provoking fear of violence, shouting, yelling and swearing, blaming, controlling, intimidation and coercion.

Financial abuse is actual or attempted theft, fraud or burglary. It is the misappropriation or misuse of money, property, benefits, material goods or other asset transactions which the person did not or could not consent to, or which were invalidated by intimidation, coercion or deception. This may include exploitation, embezzlement, withholding pension or benefits or pressure exerted around wills, property or inheritance.

Institutional abuse is the mistreatment or neglect of an adult by a regime or individuals in settings which adults who may be at risk reside in or use. This can happen in any organisation, within and outside Health and Social

Care (HSC) provision. Institutional abuse may occur when the routines, systems and regimes result in poor standards of care, poor practice and behaviours, inflexible regimes and rigid routines which violate the dignity and human rights of the adults and place them at risk of harm. Institutional abuse may occur within a culture that denies, restricts or curtails privacy, dignity, choice and independence. It involves the collective failure of a service provider or an organisation to provide safe and appropriate services, and includes a failure to ensure that the necessary preventative and/or protective measures are in place.

Neglect occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support which is required by another adult. It may be through a lack of knowledge or awareness, or through a failure to take reasonable action given the information and facts available to them at the time. It may include physical neglect to the extent that health or well-being is impaired, administering too much or too little medication, failure to provide access to appropriate health or social care, withholding the necessities of life, such as adequate nutrition, heating or clothing, or failure to intervene in situations that are dangerous to the person concerned or to others particularly where the person lacks the capacity to assess risk.

“Adult Safeguarding: Prevention and Protection in Partnership” does not include self-harm or self-neglect within the definition of an ‘adult in need of protection’. Each case will require a professional HSC assessment to determine the appropriate response and consider if any underlying factors require a protection response. For example self-harm may be the manifestation of harm which has been perpetrated by a third party and which the adult feels unable to disclose.

Exploitation is the deliberate maltreatment, manipulation or abuse of power and control over another person; to take advantage of another person or situation usually, but not always, for personal gain from using them as a commodity. It may manifest itself in many forms including slavery, servitude, forced or compulsory labour, domestic violence and abuse, sexual violence and abuse, or human trafficking.

This list of types of harmful conduct is not exhaustive, nor listed here in any order of priority. There are other indicators which should not be ignored. It is also possible that if a person is being harmed in one way, s/he may very well be experiencing harm in other ways.

Related Definitions

There are related definitions which interface with Adult Safeguarding, each of which have their own associated adult protection processes in place.

Domestic violence and abuse is ‘threatening, controlling, coercive behaviour, violence or abuse (psychological, virtual, physical, verbal, sexual, financial or emotional) inflicted on anyone (irrespective of age, ethnicity, religion,

gender, gender identity, sexual orientation or any form of disability) by a current or former intimate partner or family member'. Domestic violence and abuse is essentially a pattern of behaviour which is characterised by the exercise of control and the misuse of power by one person over another. It is usually frequent and persistent. It can include violence by a son, daughter, mother, father, husband, wife, life partner or any other person who has a close relationship with the victim. It occurs right across society, regardless of age, gender, race, ethnic or religious group, sexual orientation, wealth, disability or geography.

The response to any adult facing this situation will usually require a referral to specialist services such as Women's Aid or the Men's Advisory Project. In high risk cases a referral will also be made to the Multi-Agency Risk Assessment (MARAC) process. Specialist services will then decide if the case needs to be referred to a HSC Trust for action under the safeguarding procedures. If in doubt anyone with a concern can contact the Domestic and Sexual Violence helpline (0808 802 1414) to receive advice and guidance about how best to proceed.

Human trafficking/Modern Slavery involves the acquisition and movement of people by improper means, such as force, threat, or deception, for the purposes of exploiting them. It can take many forms, such as domestic servitude, forced criminality, forced labour, sexual exploitation and organ harvesting. Victims of human trafficking/modern slavery can come from all walks of life; they can be male or female, children or adults, and they may come from migrant or indigenous communities.

Hate crime is any incident which constitutes a criminal offence perceived by the victim or any other person as being motivated by prejudice, discrimination or hate towards a person's actual or perceived race, religious belief, sexual orientation, disability, political opinion or gender identity.

The response to adults at risk experiencing hate crime will usually be to report the incident to the Police Service.

Bullying:

Bullying is the repeated use of power by one or more persons to intentionally harm, hurt or adversely affect the rights and needs of another or others (NI Anti Bullying Forum). Although bullying is not defined as abuse, in its more extreme form it would be regarded as a form of abuse. It can take many forms but the main types are:

Emotional – excluding, being unfriendly;

Physical – hitting, kicking, theft;

Racist – racial taunts, graffiti, gestures;

Sexual – unwanted physical contact or sexually abusive comments;

Homophobic – because of or focusing on the issue of sexuality;

Verbal – name calling, sarcasm, spreading rumours, teasing;

Cyberbullying (e.g. text message, picture/video-clip and phone call bullying via mobile phones; email, website bullying).

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, causes them significant harm. In these circumstances bullying should be considered as child abuse and treated as such.

Those with a Disability:

Safeguards for those with disability should be the same as those for other children. Special input may be required if the child has severe or multiple disabilities as children who are disabled are at a higher risk of abuse.

Not every child with a disability is vulnerable in every situation. However it can be said that certain factors may mean that children with a disability are more vulnerable and could therefore be more open to abuse. The following list examines some of the reasons why children with a disability may be more vulnerable:

- Historically, children with a disability have been encouraged to comply with other people's wishes, for example, in residential homes and hospitals; this has meant they are more vulnerable to be bribed and manipulated.
- Limited life experiences and social contacts may mean that many young person with a disability have not had the same opportunities to acquire the social skills that non-disabled peers have had to assess the behaviour and attitudes of other people. This could also lead to them being unable to understand what is appropriate or inappropriate adult or peer behaviour.
- Individuals with dependency and support needs may have found that it is easier to be pleasing and compliant than challenge those caring for them because of the consequences. Any challenge or complaint could lead to more abusive practice or retribution.
- Continuing dependency on others may make some people feel powerless.
- Communication difficulties may make it hard to complain or be understood. This could be that the individual is unable to speak to tell anyone or does not have the vocabulary to describe what has happened to them.
- Individuals requiring intimate care could be in an increased vulnerable situation, especially if they have to rely on a number of different carers to support their needs.
- The general thought that a young person with a disability are not abused may make it difficult for them to be believed if they report an incident.

- Intrusion into body space for physical and medical care can lead to young people with a disability never developing ownership of their own bodies.
- Some disabilities may mean that an adult's emotional and developmental age is less than their chronological age.

Poor Practice

Poor practice can be viewed as the behaviour that can place a child or young person in a risky situation or leave a leader vulnerable to allegations that they were acting inappropriately. The following are a list of some incidents of poor practice but is not exhaustive;

- working in a private or unobserved situations and encouraging an environment of secrets,
- not treating young people with respect and dignity,
- not following agreed guidelines if physical support is needed, or seeking the parents'/ carers' views,
- not being up to date with the technical skills, qualifications and insurance for the activity,
- banning parents or carers, or
- constantly giving negative criticism.

Appendix D

REPORT FORM FOR AN ALLEGATION OR SUSPICION OF ABUSE

As an employee or artist employed by Brassneck, you have a duty of care to ensure that the children who work with us are kept safe from harm. Abuse of a child or of an adult at risk is a criminal offence. If you have a suspicion that someone is being or has been abused, or if an allegation of abuse has been made to you by a child or another individual, it is vitally important that you faithfully, truthfully and swiftly record the details. It is also important that you comply fully with the Child Protection and Adult at Risk procedures in place of the host organisation in which you are working, Brassneck's Safeguarding Policy and Procedures and the full requirements of the law.

You may not be able to, and are not expected to, complete all of this form. It is designed to act as a checklist for you to record your suspicions or any allegations made to you. There is space provided for you to add any other information you feel relevant and you can provide as many additional sheets as you need.

In addition to completing this form, you must comply with the reporting system demonstrated during your induction. Any suspicion or allegation must be directed to the Child Protection Officer or Adult Safeguarding Champion of the host organisation who is listed on their completed Questionnaire supplied to Brassneck, or to Brassneck's Youth Company Coordinator (the Artistic Director in their absence). If you are touring with a Brassneck Theatre Company show, you should inform the Production Manager that you have a concern and you have the right to be accompanied by them to see the Child Protection Officer or Adult Safeguarding Champion.

Please remember you should not discuss the details of your concerns with any other party outside of those directly involved.

Name of child/adult: _____ Age: _____ yrs

Any special factors: _____

Are you expressing your own concerns or passing on those of somebody else? If you are passing on concerns, please record some details about the person who has raised these to you.

What has raised these concerns? Please include dates, times, etc of any specific incidents.

Have you perceived any physical or behavioural signs?

Has the child/adult spoken to you? If so, what was said (include what was said to them as well as by them if possible).

Has anybody been alleged to be the abuser? If so, record details.

Has anyone else been consulted or spoken to?

Have you any further details you wish to add?

Signed: _____

Your Name: _____

Your Address: _____

Your Contact Tel No: _____

Appendix E
Induction Register

Name:

Date:

I can confirm that I have been given induction training on Brassneck's Safeguarding policy.

This covered in detail the following areas:

- **Code of Conduct**
- **Recognising Abuse**
- **Reporting Abuse**
- **Guidelines on the use of Photography**

I have been given copies of:

- **Brassneck's Safeguarding Policy**
- **Report Form**
- **Designated Officer contact details**
- **Code of Conduct**
- **Brassneck's Complaints Procedure**

I understand that any breach of policy or code of conduct will result in disciplinary action.

Signed:

Dated:

Appendix F

Training Register

Name	Disclosure check	Induction training	Refresher training	Refresher training

Appendix G

Documentation Clearance Form

Many of the activities organised by Brassneck Theatre Company Productions are recorded on film, still photography and sound devices for archive and promotional purposes. Equally young audience/participants create artefacts, drawings, collages etc in our associated workshop activities.

This form asks parents/guardians permission to record and use these (images, sound, artefacts) for Brassneck Theatre Company Productions archival and general promotions only.

Also on occasion local press and broadcast media record Brassneck Theatre Company events. Importantly, Brassneck Theatre Company **will not publish any address details or surnames of any young people** in captions associated with any film, still photography, sound or artefacts.

Participation in any filming is always optional. If you choose to withhold your permission your **child will not be excluded or penalised, unless the entire activity is being recorded.**

Parents/Guardians who wish to give permission for their children to be included/recorded in such activities **please sign below**

Name of young person _____

Name and date of Activity _____

Signature of Parents/Guardian _____

Date: _____

Parents/Guardians who do not wish their children to be included in such activities, are asked to contact Brassneck Theatre Company in writing, stating the name of the child and the arts activity they are involved in. Please send these details to **Brassneck Theatre Company, 2 Hannahstown Hill, Belfast, BT17 0LT** or by email to alison@brassnecktheatrecompany.com

If you have any queries regarding the above, please do not hesitate to contact me. Thank you for your co-operation with this matter.

Maria McCourt

Chairperson

Appendix H

INFORMATION ON SAFEGUARDING FOR HOST GROUPS – SCHOOLS, YOUTH CLUBS AND VENUES

Brassneck Theatre Company is a professional theatre company dedicated to provision of art for children and young people. It operates a Safeguarding Policy committing it to making sure children are protected and kept safe from harm while they are with the company. Brassneck Theatre Company is also committed to ensuring that the rights of children are respected and understood by its employees, including freelance artists, and volunteers.

As an organisation interested in or booked to host an Brassneck Theatre Company activity, the following outlines some additional information that relates specifically to Child Protection over and above practical arrangements for our visit.

What we expect from you

Brassneck Theatre Company expects that most organisations will have a formal Child Protection Policy and Procedures. If you do not, we would encourage you to seek advice about developing a policy. Brassneck's policy is available from the company's office or on the website www.brassnecktheatrecompany.com.

In the Questionnaire sent when you book an Brassneck Theatre Company project, we will ask for a named contact and Child Protection Officer. These might not be the same people but we would ask you to consider the time of day or the date we will visit you (i.e. at least one of these people should be there when we are).

We will also ask about the number of children/young people and the number of adults who will be there. It is your responsibility to provide adequate supervision for your group for the full duration of the activity. Under no circumstances should a Brassneck Theatre Company employee be left alone with the children at any time.

If we feel what we will be doing will provoke emotional or difficult responses, we will provide you with pre-or post- activity resources. We expect you to do any pre-work we ask if you have received it in time.

If we are unhappy at the level of supervision, inadequate facilities or if we feel our staff are being mistreated or abused, Brassneck Theatre Company will reserve the right to halt or cancel an activity.

What you can expect of us

You can be assured that anyone from Brassneck Theatre Company who visits your organisation has committed themselves to Brassneck's Safeguarding Policy and undertaken induction. They will be trained professionals who understand how to work with young people and they will show you and your children the respect you deserve. They will also have received induction in recognising signs of abuse, reporting allegations and concerns and receiving disclosures. They will have also undergone an Enhanced Disclosure check by Access NI.

If there is an emotionally sensitive content to the work we are doing with you (either in workshop or performance) we will provide you with appropriate resource materials, if necessary in advance to enable group preparation.

If you have any concerns about the appropriateness of an activity, we will be open to your comments and will examine whether or not a particular aspect of our work should be adjusted accordingly. For some of our projects, we will carry out a preliminary phone check with you about your group.

If at any point you have a concern about the behaviour of one of our employees, contact **Brassneck's Chairperson Maria McCourt** at mariainoz@hotmail.com If she is not immediately available, please explain that it is an urgent call. A message will be passed to her and your call will be returned as soon as possible and within 24 hours.

Appendix I

Whistleblowing Policy

Whistleblowing occurs when a staff member or volunteer raises a concern about misconduct or abusive practices by individuals and/or an organisation, where such practices cause harm or risk of harm. This will include situations where a staff member or volunteer's concerns are not acted upon by the Designated Child Protection Officer or Designated Adult Safeguarding Champion.

1. Our Commitment

At Brassneck Theatre Company, we:

- are committed to the highest possible standards of conduct, openness, honesty and accountability;
- take poor practice or malpractice seriously;
- will ensure staff or volunteers are enabled to access confidential advice from an independent source;
- where possible, will respect the confidentiality of a member of staff raising a concern through the whistleblowing procedure;
- recognise that it is a disciplinary matter to both victimise a bona fide whistleblower and for someone to maliciously make a false allegation

2. Aim of the policy

The aims of this policy are to:

- provide an effective way for staff members and volunteers to raise serious concerns
- ensure that feedback is received on any action undertaken by us as a result of serious concerns being raised
- ensure that the member of staff or volunteer will be protected from reprisals or victimisation for having raised concerns in good faith
- signpost staff or volunteers to further options available if they are dissatisfied with our response, or if internal investigation is not appropriate
- allow Brassneck Theatre Company to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

3. Who this policy applies to

This policy applies to everyone who works for and volunteers with Brassneck Theatre Company. This means Brassneck employees, volunteers, freelancers, interns, and contractors.

4. Protecting individuals using this policy

Who is protected:

It's in the public interest that the law protects whistleblowers so that they can speak out if they find malpractice in an organisation.

As a whistleblower you're protected from victimisation if you're:

- a worker
- revealing information of the right type by making what is known as a qualifying disclosure
- revealing it to the right person and in the right way making it a protected disclosure
- 'Worker' has a special and wide meaning for these protections. As well as employees it includes agency workers and people who aren't employed but are in training with employers.

Where protection applies:

Qualifying disclosures

To be protected, you need to make a qualifying disclosure.

You need to reasonably believe that the disclosure is being made in the public interest and that malpractice in the workplace is happening, has happened or will happen.

Disclosures which can be characterised as being of a personal rather than public interest will not be protected.

The types of malpractice the law covers are:

- criminal offences
- failure to comply with a legal obligation
- miscarriages of justice
- threats to people's health and safety
- damage to the environment
- The law also covers a deliberate attempt to cover-up any of these.

It's important to remember, however, that you may not be protected if you break another law in blowing the whistle. For example, if you've signed the Official Secrets Act as part of your employment contract.

Protected disclosures

For your disclosure to be protected by law, you must make it to the right person and in the right way.

If you make a qualifying disclosure to your employer, or through procedures which your employer has authorised, the law protects you.

You can also complain to the person who is responsible for the area that is of concern to you. For example, you might raise concerns about Child Protection with the Designated Child Protection Officer.

For a disclosure to a 'prescribed person' to be protected, you must fulfil the following requirements:

- reasonably believe that the information is substantially true
- reasonably believe you are making the disclosure to the right prescribed person

In certain circumstances you can also make disclosures to others. These include disclosures:

- to your legal adviser
- to a government minister
- 'in other cases' to others such as a professional standards body

However, there are different sets of rules as to when each of these disclosures will be protected. For example, the rules covering disclosures 'in other cases' are extremely strict, among other things, you must not be acting for personal gain.

If you're unsure, you should always get professional advice before you go ahead and make a disclosure.

Anything you say to a legal adviser to get advice is automatically protected.

5. Malicious disclosures

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the appropriate Brassneck Theatre Company policy.

6. Non-whistleblowing concerns

This policy is only to be used in the exceptional circumstances as outlined in section 4, above. There are a number of Brassneck Theatre Company policies that will be relevant in other circumstances, for example, the Children and Adults at Risk Protection Policy or the Dignity at Work policy.

7. Procedure for raising a concern

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

You can make your disclosure orally but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- provide any relevant context and background, including relevant dates, venues, names etc
- state clearly the reason why the situation causes for concern.

You must say that you are raising your concern using the whistleblowing policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your concern confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible.

We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

Who should I raise it with?

You should always look to raise the matter with your line manager in the first instance.

Where this is not appropriate because they may be involved in the alleged malpractice, wrongdoing or illegal acts or omissions in some way, raise your concern with their manager or the designated safeguarding person.

In some circumstances where it would be inappropriate for you to approach your manager or their manager or the designated safeguarding person, you should raise the matter directly with the Board of Trustees:

Chairperson: Maria McCourt
Email: mariainoz@hotmail.com

What happens next?

The form of the investigation will depend on the nature of the concern and the people involved but will usually start as an internal inquiry involving members of staff at an appropriate level who have the skills and experience relevant to the concern raised. If necessary, we may appoint external investigators and may inform external regulators or other bodies.

Brassneck will inform you:

- Who is responsible for handling the matter.
- How they can be contacted.
- Whether further assistance may be needed.

If requested, Brassneck will write to you summarising your concern and detailing how we propose to handle it. If your concern is covered by other company procedures, we will let you know. The investigation may result in recommendations for changes to our practices or processes and may lead to disciplinary action against individuals involved in any wrongdoing. The Whistleblowing policy allows genuine public concerns to be reported, investigated and remedied within the organisation.

8. Raising a concern externally

We strongly encourage you to exhaust the internal processes set out above in the first instances.

In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies, for example, to the Charity Commission for Northern Ireland