Policy Number: SG001
Review Date: June 2026 — V7

SAFEGUARDING CHILDREN POLICY

1. PURPOSE AND SCOPE

This policy sets out Blenheim's approach to safeguarding and promoting the welfare of children. It applies to all aspects of Blenheim's work and anyone working on behalf of Blenheim including, but not limited to, all employees contracted by Blenheim, the board of trustees, volunteers, freelance sessional workers, contractors, consultants, partners and programme visitors including journalists, celebrities and politicians.

The purpose of this policy is to protect children from any harm that may be caused due to their coming into contact with Blenheim. This includes harm arising from:

- The conduct of staff associated with Blenheim and Blenheim's Partners
- The design and implementation of Blenheim's activities
- The use of Blenheim's site and services

The policy lays out the commitments made by Blenheim and informs employees of their responsibilities in relation to safeguarding.

2. LEGAL FRAMEWORK

Blenheim uses the definition of the term 'safeguarding' from statutory guidance, Working Together to Safeguard Children

Safeguarding children is defined in Working Together to Safeguard Children as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding applies consistently and without exception across our activities. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be child centred and also protect those accused until proven guilty.

3. POLICY STATEMENT

Blenheim believes that

- Children should never experience or be subject to any form of harm or abuse
- We have a responsibility to promote the welfare of children, to keep them safe and to practise in ways that protect them.

Blenheim recognises that

- The welfare of children is paramount
- Everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, ethnic origin, race, religion or belief has the right to equal protection from all forms of harm or abuse.
- Working in partnership with children, their parents, carers and other agencies is essential to safeguarding children and promoting their welfare.

4. PREVENTION

Blenheim responsibilities

Blenheim will:

- Ensure all employees have access to, are familiar with, and know their responsibilities within this policy and receive training on safeguarding and child protection.
- Appoint a Designated Safeguarding Officer, a Deputy Safeguarding Officer and a lead Trustee/ board member for safeguarding
- Ensure Managers are trained to receive concerns in the absence of the Designated and Deputy Safeguarding Officers and understand procedures for managing an incident
- Ensure a safe physical environment and undertake all activities in a way that protects people from any risk of harm that may arise from their meeting with Blenheim and acts in accordance with the law and regulatory guidance. This includes the way in which information about individuals in our activities is gathered, stored and communicated
- Maintain an environment that promotes positive health and wellbeing through effective policies and procedures including anti bullying, complaints and whistleblowing measures
- Ensure appropriate procedures are in place to prevent, identify and respond to radicalisation
- Implement stringent safeguarding procedures when recruiting, managing and deploying employees and associated personnel, including all necessary checks and appropriate training.
- Implementing a behavior code for all employees and associated personal.
- Use our procedures and due process to manage any reports of safeguarding concerns or allegations promptly and appropriately
- Agree safeguarding procedures with all contractors, partners and external organisation working with Blenheim.
- Review best practice and update this policy and all related policies, procedures and guidance annually or as required, in accordance with the law and regulatory guidance

Designated Safeguarding Officer	Deputy Designated Safeguarding Officer	Lead Board Member for Safeguarding
Heather Carter	Alice Bennett	Dominic Hare
Director of Operations	Health & Safety Coordinator	Chief Executive Officer

Designated Safeguarding Staff

Related policies, procedures and guidance documents
The following policies, procedures and guidance documents support Blenheim's safeguarding practice and should be read in conjunction with this policy

- Health and safety policies and procedures
- Disclosure of Malpractice in the Workplace (Whistleblowing) Policy
- Anti-bullying and harassment policy
- Equality and diversity policy
- Role of the Designated Safeguarding Officer
- Safeguarding guidance
- Code of Conduct

4a. CHILD PERFORMANCE LICENCES

Where any child under minimum school leaving age takes part in a public performance at Blenheim and Pye (including outdoor theatre, concerts, film or broadcast recordings, modelling, or public demonstrations), the organiser must ensure that a Child Performance Licence has been obtained from Oxfordshire County Council prior to the performance. This requirement arises under the Children and Young Persons Acts 1933 and 1963 and the Children (Performances and Activities) (England) Regulations 2014.

Key requirements:

- Applications to Oxfordshire County Council at least 21 days before the performance backdated licences cannot be issued.
- A Body of Persons Approval (BOPA) may be used for amateur group performances where no payment is made, the child need not be absent from school, and has not performed more than three days in the previous six months.
- Separate changing facilities must be provided for boys, girls, and adults.
- A sign-in/sign-out register must be maintained.
- Strict time restrictions apply by age (e.g. ages 5–9: max 8 hours at venue, max 3 hours performing). External event organisers using Blenheim's grounds for any such performances must confirm compliance with these requirements in writing before any booking is confirmed, and the Designated Safeguarding Officer must be notified at the earliest opportunity.

4b. PHOTOGRAPHY, FILMING AND USE OF CHILDREN'S IMAGES

Photographs and video recordings of children are personal data under UK GDPR and the Data Protection Act 2018. Blenheim and Pye has a legal and ethical duty to handle such data lawfully, fairly, and securely. The following requirements apply to all staff, volunteers, contractors, event partners, and media personnel on site.

Consent: Written, opt-in consent must be obtained from a parent or guardian before any photograph or video of an identifiable child under 16 is taken, used, or shared by or on behalf of Blenheim. Consent forms must clearly specify each intended use (e.g. internal records, website, printed materials, social media, marketing). Images must not be used for any purpose not covered by the original consent; fresh consent is required for new uses. Children aged 16–17 should also provide their own consent alongside parental consent. Children of any age must be consulted and their views respected. Consent may be withdrawn at any time in writing; upon withdrawal, images must be removed from active use promptly and not shared further. All consent records must be retained and available to the Designated Safeguarding Officer on request.

Vulnerable children: No photographs or videos may be taken of any child who is looked-after, adopted, subject to a care order, or about whom there are active child protection concerns, without prior written agreement from the relevant authority. Staff must check with the Designated Safeguarding Officer before photography involving any child in these circumstances.

Social media and public sharing: Images of children must not be posted on Blenheim's social media, website, or shared with third parties including press and media, unless specific consent for that purpose has been obtained. Where images are captured incidentally during events, reasonable steps must be taken to avoid focusing on or identifying individual children. External photographers and film crews must be briefed on this policy, sign a declaration of compliance, and hold appropriate DBS clearance where

they will have unsupervised access to children. Any data protection breach involving children's images must be reported immediately to the Designated Safeguarding Officer and Data Protection Officer.

5. ENABLING REPORTS

Blenheim will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to employees, associated personnel and the communities we work with.

Any employees reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Blenheim Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

Blenheim will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Employee members who have a complaint or concern relating to safeguarding should report it immediately to the Designated Safeguarding Officer. If the Designated Safeguarding Officer is off site it should be reported to the Deputy Designated Safeguarding Officer. If the employee member does not feel comfortable reporting to the Designated Safeguarding Officer (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the Deputy Designated Safeguarding Officer. In the absence of the appointed safeguarding personnel concerns should be reported to Managers

Designated Safeguarding Officer

Heather Carter
Operations Director
External phone number: 07887 881755
Internal Phone number: 531
Email: HCarter@blenheimpalace.com

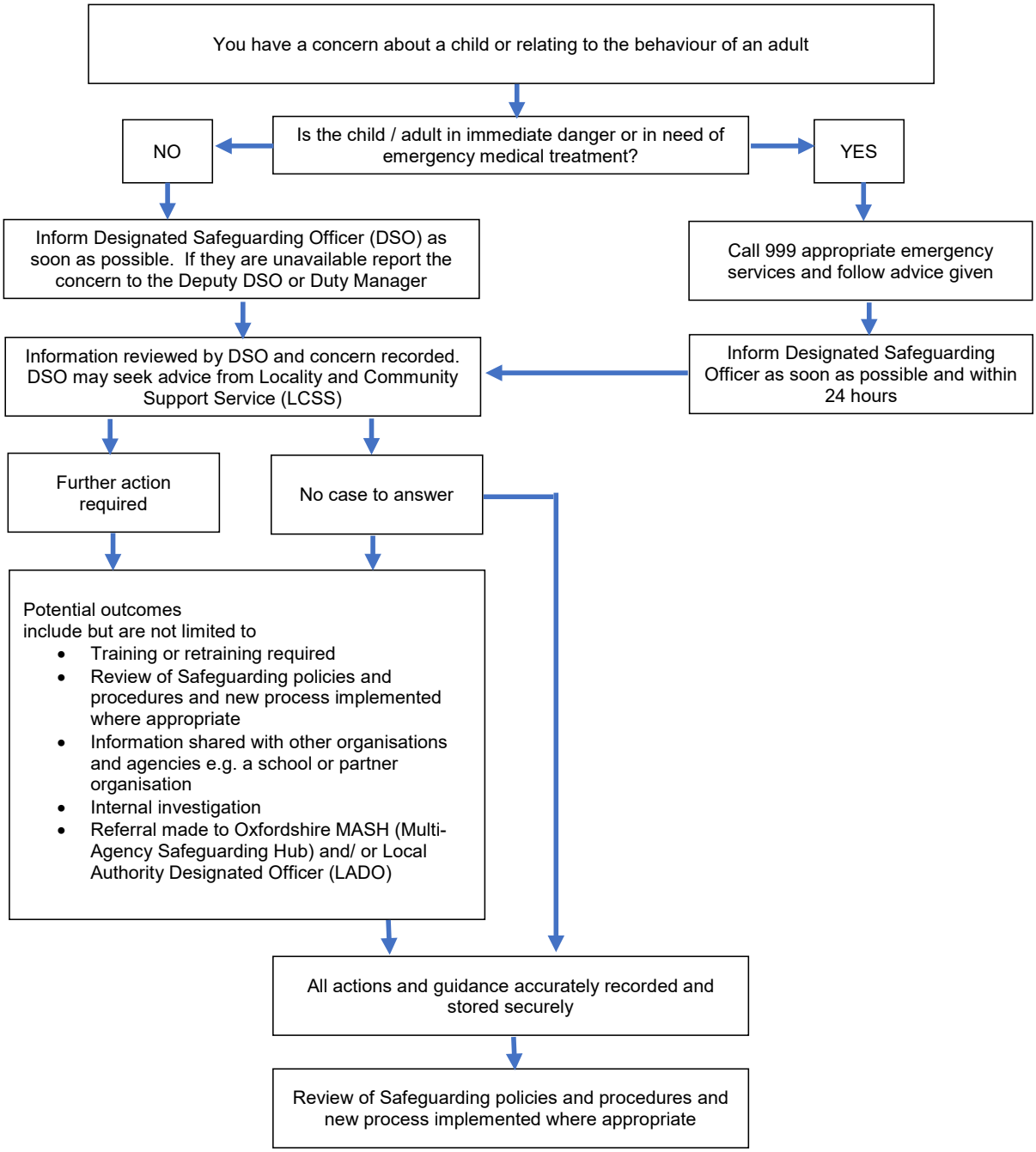
Deputy Designated Safeguarding Officer

Alice Bennett
Health & Safety Coordinator
External phone number: 01993 815 653
Mobile phone number: 07469359300
Email: abennett@blenheimpalace.com

Complaints or concerns from external sources should be reported to:
Safeguarding@blenheimpalace.com

This email is monitored by Designated Safeguarding Staff only

Reporting a Concern Procedure

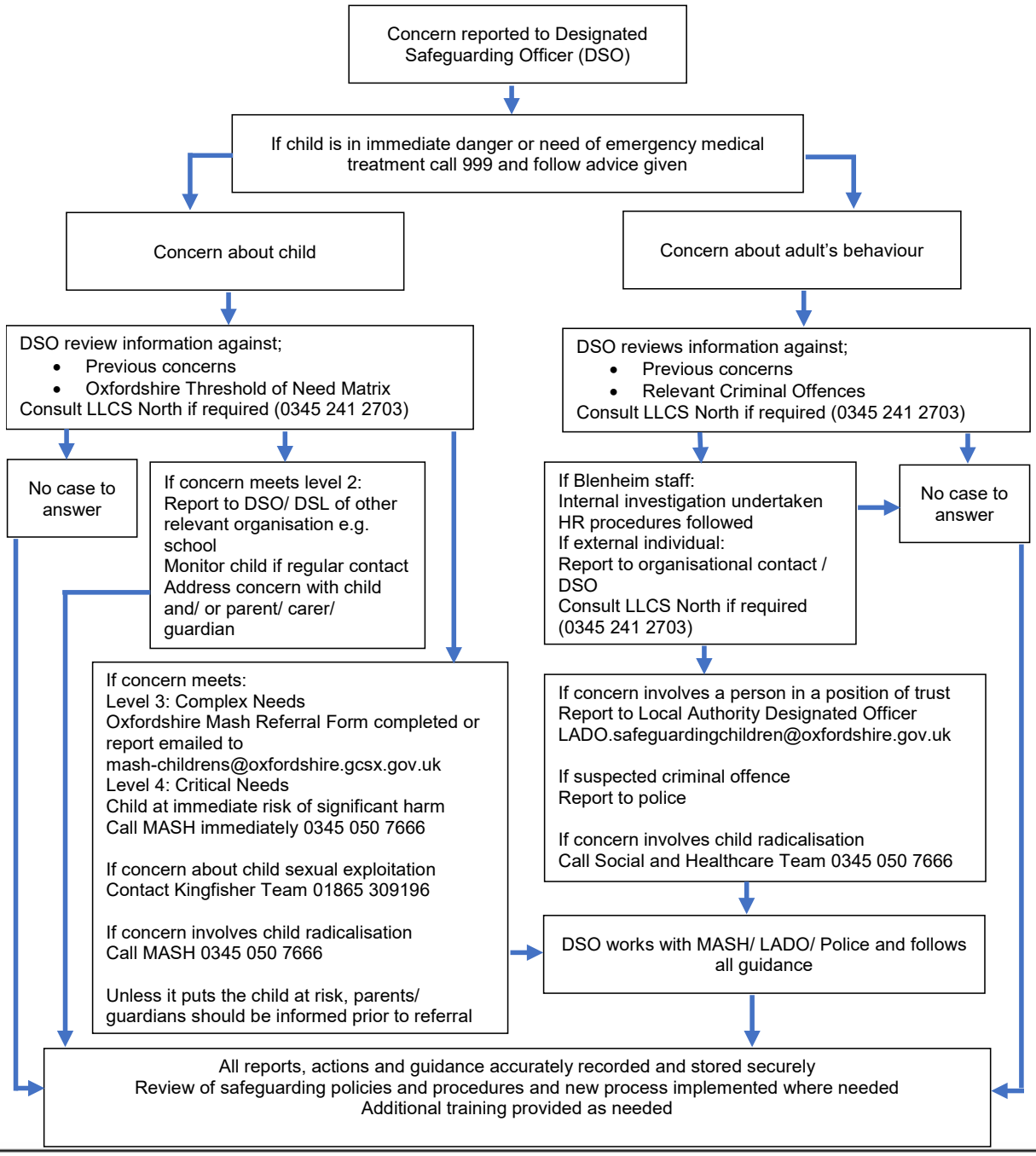

You have a concern about a child or relating to the behaviour of an adult
Is the child / adult in immediate danger or in need of emergency medical treatment?
NO
YES
Inform Designated Safeguarding Officer (DSO) as soon as possible. If they are unavailable report the concern to the Deputy DSO or Duty Manager
Call 999 appropriate emergency services and follow advice given
Information reviewed by DSO and concern recorded. DSO may seek advice from Locality and Community Support Service (LCSS)
Inform Designated Safeguarding Officer as soon as possible and within 24 hours
Further action required
No case to answer
Potential outcomes include but are not limited to
Training or retraining required
Review of Safeguarding policies and procedures and new process implemented where appropriate
Information shared with other organisations and agencies e.g. a school or partner organisation
Internal investigation
Referral made to Oxfordshire MASH (Multi-Agency Safeguarding Hub) and/ or Local Authority Designated Officer (LADO)
All actions and guidance accurately recorded and stored securely
Review of Safeguarding policies and procedures and new process implemented where appropriate

6. RESPONSE

Blenheim will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. Blenheim is committed to working with local safeguarding partners to respond to safeguarding concerns and reports, sharing all relevant information.

Blenheim will apply appropriate disciplinary measures to employees found in breach of policy.

Child Protection Procedure



7. CONFIDENTIALITY

It is essential that confidentiality in maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should always be kept secure.

7.1 Communication across the business

Any concerns that have been raised by a member of staff regarding another member staff, it may not be appropriate to relay to their line manager or anyone other than safeguarding team initially.

The factors below will need to be considered.

GLOSSARY OF TERMS

Age of a child
A child, as defined by the UN Convention of the Rights of the Child and the Children Act 1989, is anyone under the age of 18

Child protection
Child Protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse
As defined in Working Together to Safeguard Children abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults, or another child or children. There are four defined types of child abuse, physical, emotional, sexual and neglect.

- Physical Abuse
- Physical abuse is deliberately hurting a child and causing physical harm through physical acts such as hitting, kicking, shaking, burning, suffocating and poisoning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- Emotional Abuse
- The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- Sexual Abuse
- Sexual abuse is any sexual activity with a child whether or not the child is aware of what is happening and does not necessarily involving a high level of violence. The activities may involve physical contact, including assault by penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

- Neglect
- The ongoing failure to meet a child's basic physical and emotional needs. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
    - provide adequate food, clothing and shelter (including exclusion from home or abandonment)
    - protect a child from physical and emotional harm or danger
    - ensure adequate supervision (including the use of inadequate caregivers)
    - ensure access to appropriate medical care or treatment

Child sexual exploitation
Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants,
and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child criminal exploitation
As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited
even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Safeguarding Partners
A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:
(a) the local authority
(b) a clinical commissioning group for an area any part of which falls within the local authority area
(c) the chief officer of police for an area any part of which falls within the local authority area

Radicalisation
Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism
Extremism is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

7.2 Incident / Concern Triage Reporting Process and group discussion

Triage Process

Should any safeguarding issues arise that require further reporting, a triage panel will be convened by the Safeguarding officers. The panel will be convened over the phone where possible but if not, remotely by mobile phone (radios must not be used for Safeguarding). Discussions will be anonymised unless information sharing is in the best interests of safeguarding.

Triage Principles

The decisions will relate to:

- The immediate response at the event
- Decisions about at what level each case will be dealt with (minor poor practice through
- to suspected abuse) and
- The route a case will take (no further action, referral in writing to employing/deploying
- organisation or country for disciplinary proceedings to be initiated and/or external
- referral to statutory agencies).
- The offices will also act on any emerging themes such as bullying behaviour. The panel
- will record all information gathered and all decisions and track actions as required.
- The panel members will be: - Safeguarding offices
- Triage is done through online reporting platform Eco Online all documents saved on there, HR maybe asked to save documents to staff files also.