

# Blackheath Conservatoire

## Safeguarding Policy

2024-25

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# THE SAFEGUARDING OF CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

## Introduction

The Blackheath Conservatoire of Music and Arts Limited ("The Conservatoire"), is fully committed to promoting the safety and well-being of all visitors. We recognise that we have a particular responsibility in relation to vulnerable learners and the welfare of the vulnerable is paramount. All those visiting the Conservatoire and accessing courses or events have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.

Safeguarding is a relatively new term, which is broader than 'child protection' as it also includes prevention. In common with all charities, the trustees have a duty of care towards those to whom it offers a service and with whom those employed, volunteering at, or contracted by, the Conservatoire might come into contact. An effective safeguarding policy protects the charity (trustees), the learner, other visitors and all staff, contractors and volunteers working within the organisation.

The policy is applicable within The Conservatoire and all other agencies working either in partnership with or under the auspices of The Conservatoire. It also covers aspects of work and performance which take place outside of The Conservatoire building.

Any allegation or concern about abuse must be reported, responded to and escalated, as appropriate. Safeguarding and promoting the welfare and well-being of vulnerable learners is everybody's business, although individual roles within the process may be different.

This Policy must be read and considered alongside the Conservatoire's Code of Conduct, copies of which are circulated to, and signed for, by every member of staff, tutor, trustee or volunteer.

## Objectives of the Policy

- To explain the responsibilities of The Conservatoire and its staff, trustees, volunteers, contractors and all others working under the jurisdiction of The Conservatoire have in respect of protecting and safeguarding vulnerable learners.
- To support the procedures for safer recruiting of employees, volunteers etc. in accordance with the relevant legislation and guidance.
- To support the promotion of a safe working environment and a culture of care in which the rights of all learners, staff and tutors are protected and respected.
- To provide an overview of the legislation surrounding vulnerable learners which sets the context within which people are expected to work.

## Responsibilities

Safeguarding is the responsibility of everyone working within The Conservatoire. It is not up to individual tutors or admins to decide whether a vulnerable learner is suffering from harm as a result of neglect or abuse. However, it is the responsibility of anyone working for, or on behalf of, The Conservatoire who suspects a form of abuse is being perpetrated against a vulnerable learner, either by someone within The Conservatoire or outside of The Conservatoire, to report these concerns as soon as possible to the Designated Safeguarding Lead within the organisation.

All those working within The Conservatoire must be aware of the limitations of their role in cases of suspected abuse and appreciate that although they are seeking to help a vulnerable learner they consider to be at risk, their role is only to report their concerns to the person/s with responsibility for safeguarding within the institution. It is for other agencies with statutory powers to take action beyond the initial referral.

### Within The Conservatoire the persons with formal responsibility for Safeguarding are:

#### Designated Safeguarding Lead

Patrick Holden      Executive Director      patrick.holden@conservatoire.org.uk      020 8852 0234

#### Deputy Designated Safeguarding Lead

Mairéad Sheerin      Artistic Director      mairead.sheerin@conservatoire.org.uk      020 8852 0234

#### Deputy Designated Safeguarding Lead

Dee De Bellotte      Operations Director      dee.debellotte@conservatoire.org.uk      020 8852 0234

#### Trustee Safeguarding Lead

Emma Smillie      Trustee      emmaparkere14@gmail.com      020 8852 0234

# Definitions

## Vulnerable Learners

For the purposes of this policy, all learners under the age of 18 are automatically deemed vulnerable.

Some adults over the age of 18 may also be vulnerable. Both groups may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a learner who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently
- excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

For a variety of reasons, learners with additional needs face an increased risk of abuse and neglect, therefore adults are expected to take extra care to correctly interpret apparent signs of abuse or neglect. Indications of abuse will be reported as for other learners. Those learners with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration
- Learners with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Difficulties may arise in overcoming communication barriers

Lastly, some learners might be described as 'vulnerable' if they have low self-esteem, are socially excluded or have a history of offending or substance misuse.

For the purposes of this policy document, the above groups shall, together, be termed "vulnerable learners".

## **Definition of Safeguarding and Child Protection**

The term 'Safeguarding' is used to include Child Protection.

Safeguarding and promoting the welfare of vulnerable learners is defined as:

- Providing help and support to meet the needs of vulnerable learners as soon as problems emerge
- Protecting vulnerable learners from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of vulnerable learners' mental and physical health or development
- Ensuring that vulnerable learners grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

All those working with vulnerable learners must take reasonable measures to ensure that the risks of harm to their welfare are minimized. Where there are concerns about children, young people and vulnerable adults' welfare, all agencies must take appropriate action to address these concerns.

All staff should have an awareness of safeguarding issues that can put vulnerable learners at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that vulnerable learners are at risk.

## Key Conservatoire Safeguarding Policies

1. The Conservatoire requires all those working with vulnerable learners to address issues of Safeguarding as being of paramount importance. All those working within The Conservatoire will be expected to work within the framework of the Policy and Code of Practice and other, related Policies (specifically the Code of Conduct and Complaints Policy).
2. Employment contracts and contracts for services where someone is interacting with vulnerable learners will include the requirement to adhere to the Safeguarding policy, the Online Teaching Policy, the Code of Practice and the Code of Conduct.
3. All Conservatoire staff and tutors must read at least Part One of the most recent version of *Keeping Children Safe in Education (KCSIE)* annually.

### Disclosure and Barring Service (DBS)

4. All who work for or on behalf of the Conservatoire who may come into regular contact with vulnerable learners will be subject to an Enhanced DBS check with Children's Barring List check in order to work at The Conservatoire. Those who do not have unsupervised access to vulnerable learners (for example volunteers and trustees) will have an enhanced DBS check only. Everyone must have a valid DBS checked within the last three years, and this should be checked every three years after this. The Conservatoire will pay for DBS checks for staff, tutors, teaching assistants, holiday course tutors, volunteers and trustees. The Programme Manager and Assistant will administer the DBS checks on behalf of the Conservatoire.
5. During the time that a DBS check is being done, the individual concerned and their manager should ensure they do not have any unsupervised one to one contact with young people or vulnerable adults.
6. All parties have a duty to disclose any incidents that would otherwise appear on a DBS check if they occur during a period of employment or volunteering.

### Training

7. The Conservatoire is committed to training all staff, tutors and volunteers in safeguarding policy and procedures, and the accompanying Code of Practice, as part of the induction process. All staff, tutors, volunteers and trustees must undertake safeguarding training annually – whether through the Conservatoire or another organisation.
8. The Conservatoire keeps a record to ensure all staff complete the training at the point of employment and annually thereafter by the end of October each year.

### Contact with vulnerable learners outside the Conservatoire

9. Other than in exceptional circumstances and only with the full permission of the Executive Director, a tutor or others working within The Conservatoire must not make visits to the home of any vulnerable learner. Should such a visit be deemed necessary, then such a visit should usually be made with another senior member of The Conservatoire in attendance. Such visits must only be made once the permission of the parent/carer/guardian of the vulnerable learner has been received in writing.
10. Staff and tutors should not give a learner a lift in a vehicle except in exceptional circumstances with another adult present.

11. There should be no direct contact with learners under the age of 18 via email, text message or social media.
12. No photography or filming should be carried out without parental and Conservatoire permission. It is essential to follow the code of conduct on images of learners.
13. The use of mobile phones, laptops, iPads etc should be limited and no personal devices should be used to capture any images.
14. The Conservatoire has a Safeguarding Register where any disclosures from a vulnerable learner will be recorded.

### **E-Safety**

15. The DSL has responsibility for ensuring that appropriate E-safety controls are in place. These include:
  - URL Filtering – Publicly accessible WIFI and all Conservatoire devices will have appropriate URL filters.
  - URL Monitoring – The system of URL filtering will itself be monitored and approved by the Board annually.
  - Staff Training – This will include an understanding of the roles and responsibilities in relation to filtering and monitoring.
  - Achieve and Maintain the *Friendly WIFI* certification
  - Working towards the *CyberSecurity Standards for Schools and Colleges*.

### **Off-Site Activities**

#### *Planning and Organisation*

16. All off-site activities will be risk assessed from both a Safeguarding and Health & Safety Perspective. The Conservatoire's Safeguarding and other relevant policies will apply to any off-site activities.
17. A method of communication will be in place between the offsite activity leaders and the Conservatoire main office.

#### *Running off-site activities*

18. Activity leaders should avoid all situations where they and an individual learner are unobserved.
19. When physical touching is required (e.g. when demonstrating how to hold an instrument or coaching a dance posture) permission should be sought from the child and the activity conducted openly – ideally with other staff present.
20. Comfort or reassure a distressed child or young person in an age-appropriate way, whilst maintaining clear professional boundaries.
21. Follow reporting procedures if a child or young person makes a disclosure of abuse or if anything of concern is observed.



## **Operations**

22. *Vulnerable Learners use of Practice Rooms* - All learners under the age of 16 who wish to use a practice room or studio must be accompanied by an adult.
23. *Learner's traveling home unaccompanied* – *Learners may be allowed to travel home unaccompanied depending on their school year:*  
Yr 5 or under - Must be picked up by a known parent/guardian  
Yr 6 - Can be allowed to leave alone with prior written permission from a parent or guardian  
Yr 7 - Can be allowed to leave alone
24. *Court orders restricting access to learners* - If we have received notification of court orders restricting access (eg to estranged parents or other persons) these to be noted on Paritor and identified on the class register. In these rare cases, tutors will ensure learners are picked up by the appropriate adult only.
25. *Learners left in reception* - Learners may only be left in reception in exceptional emergencies.
26. *Unaccompanied Learners* – In general, learners below Yr7 are not permitted to wait unaccompanied, for example between or after classes.

## **Continuity and Record Keeping**

27. Staff and student records will be kept for the statutory minimum period for the type of record in question. Class and tutor registers will be kept for 25 years.
28. Should the Conservatoire cease operations, these records will be transferred to the LB Lewisham Multi-Agency Safeguarding Hub (MASH).

## Types of abuse

Abuse is a form of maltreatment of a vulnerable person. Somebody may abuse or neglect a vulnerable person by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on vulnerable persons of all forms of domestic abuse, including where they see, hear or experience its effects. Vulnerable persons may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Vulnerable persons may be abused by an adult or adults or by a young person or persons.

### *Physical abuse*

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a vulnerable learner. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to, a vulnerable person under their care. A person might do this because they enjoy or need the attention they get through caring for someone that is sick. Physical abuse, as well as being a result of an act of commission can also be caused through the failure to act to protect.

Possible signs of abuse: Look for clusters of these signs:

- Unexplained burns, broken bones, bite marks, cuts, bruises, or welts in the shape of an object.
- Resistance to going home.
- Fear of adults.

Consider the possibility of physical abuse when the parent or other adult caregiver:

- Offers conflicting, unconvincing, or no explanation for the learner's injuries.
- Describes the learner in a very negative way, for example as "evil".
- Uses harsh physical discipline with the learner.
- Has a history of abuse as a child.
- Emotional abuse

### *Emotional abuse*

Emotional abuse is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on that person's emotional development. It may involve making someone feel or believe that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person.

Emotional abuse 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 the 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 cyberbullying),

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, although it may occur alone

Possible signs of emotional abuse:

- Apathy, depression
- Hostility
- Difficulty concentrating
- Overly compliant or demanding behaviour, extreme passivity, or aggression.
- Extremes in behaviour, such as being either inappropriately adult (parenting other children, for example) or inappropriately infantile (frequently rocking or head-banging, for example).
- Delayed in physical or emotional development.
- Has attempted suicide.
- Reports a lack of attachment to the parent.

Consider the possibility of emotional abuse when the parent or other adult caregiver:

- Constantly blames, belittles, or berates the child.
- Is unconcerned about the child and refuses to consider offers of help for the child's problems.
- Overtly rejects the child.

### *Sexual Abuse*

Sexual Abuse involves forcing or enticing a vulnerable person to take part in sexual activities, not necessarily involving violence, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving vulnerable people in looking at, or in the production of, sexual images, watching sexual activities, encouraging vulnerable people to behave in sexually inappropriate ways, or grooming a vulnerable person in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the Conservatoire's policy and procedures for dealing with it.

Possible signs of sexual abuse:

- Inappropriate interest in or knowledge of sexual acts.
- Seductiveness.
- Avoidance of things related to sexuality, or rejection of own genitals or body.
- Either over compliance or excessive aggression.
- Fear of a particular person or family member.
- Difficulty walking or sitting.
- Suddenly refuses to participate in physical activities.

Consider the possibility of sexual abuse when the parent or other adult caregiver:

- Is unduly protective of the learner or severely limits the learner's contact with other people, especially of the opposite sex.
- Is secretive and isolated.
- Is jealous or controlling with family members.

### ***Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)***

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### ***Child Criminal Exploitation (CCE)***

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

#### ***Child sexual exploitation (CSE)***

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour
- Physical signs such as bleeding
- Being frightened of some people, places or situations.

There are three main types of child sexual exploitation:

- Inappropriate relationships - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- Boyfriend/Girlfriend - Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.
- Gangs: Gangs use sexual exploitation to exert power and control, for initiation and also use sexual violence as a weapon Children can be invited to parties or gatherings with others of their own age or adults and given drugs and alcohol. They may be assaulted and sexually abused by one person or multiple perpetrators.

If colleagues have concerns about any learners at risk of CSE, they should ensure that their concerns are passed promptly on to the DSL so that a referral is made to the appropriate agency.

### *Child-on-Child Abuse*

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

### *Sexting*

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

[Online safety in schools and colleges: Questions from the Governing Board - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### *Neglect*

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

*Possible signs of neglect:*

- Clothing unsuited to the weather.
- Child dirty or unbathed.
- Extreme hunger.
- Apparent lack of supervision.
- Has not received help for physical or medical problems brought to the parents' attention.
- Has learning problems (or difficulty concentrating) that cannot be attributed to specific physical or psychological causes.
- Is always watchful, as though preparing for something bad to happen.
- Lacks adult supervision.
- Is overly compliant, passive, or withdrawn.
- Comes to activities early, stays late, and does not want to go home.
- Is frequently absent from school.
- Beggars or steals food or money.
- Lacks needed medical or dental care, immunizations, or glasses.
- States that there is no one at home to provide care.

Consider the possibility of neglect when the parent or other adult caregiver:

- and learner rarely touch or look at each other.
- Shows little concern for the learner.
- Denies the existence of—or blames the learner for—the learner's problems in school or at home.
- Asks teachers or other caretakers to use harsh physical discipline if the learner misbehaves.
- Sees the learner as entirely bad, worthless, or burdensome.
- Demands a level of physical or academic performance the learner cannot achieve.
- Looks primarily to the learner for care, attention, and satisfaction of emotional needs.

*Domestic Violence*

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual
- financial
- Emotional
- In extreme cases this could include murder.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their

everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

#### *Children and young people witnessing domestic abuse*

Witnessing domestic abuse is really distressing for a child and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear the abuse from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse

#### *Female Genital Mutilation (FGM)*

FGM affects girls particularly from north African countries, including Egypt, Sudan, Somalia and Sierra Leone.

It is illegal in the United Kingdom to allow girls to undergo Female Genital Mutilation either in this country or abroad. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison. Staff have a **legal duty to report concerns** we have about girls at risk of FGM to the police and social services.

FGM occurs mainly in Africa and to a lesser extent, in the Middle East and Asia. Although it is believed by many to be a religious issue, it is a cultural practice. There are no health benefits.

Communities particularly affected by FGM in the UK include girls from:

- Somalia
- Kenya
- Ethiopia
- Sierra Leone
- Sudan
- Egypt
- Nigeria
- Eritrea
- Yemen
- Indonesia
- Afghanistan

In the UK, FGM tends to occur in areas with larger populations of communities who practice FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include: London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes. In England and Wales, 23,000 girls under 15 could be at risk of FGM.



#### Key Points:

- FGM is not a religious practice
- Occurs mostly to girls aged from 5 – 8 years old; but up to around 15
- Criminal offence in UK since 1985
- Offence since 2003 to take girls abroad
- Criminal penalties include up to 14 years in prison

#### Reasons for this cultural practice include:

- Cultural identity – An initiation into womanhood
- Gender Identity – Moving from girl to woman – enhancing femininity
- Sexual control – reduce the woman's desire for sex
- Hygiene/cleanliness – un mutilated women are regarded as unclean

#### Risk Factors include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the family's country of origin
- talk about a 'special' event or procedure to 'become a woman'

#### FGM High Risk Time

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Tutors should be alert to the possibility of FGM as a reason why a girl in a high-risk group is absent from school or where the family request an 'authorised absence' for just before or just after the summer school holidays.

Although, it is difficult to identify girls before FGM takes place, where girls from these high-risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

#### Post-FGM Symptoms include:

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

#### Longer Term problems include:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections

- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Safeguarding Lead. The duty does not apply in relation to at risk or suspected cases.

If we have concerns about FGM, we will discuss these with parents/carers where appropriate, and the young person concerned, before taking any further action. In cases where it is deemed likely that discussing preliminary concerns with the family may put a child(ren) at risk of any kind, we may not discuss this with parents/carers before reporting to the relevant authorities.

#### *Forced Marriage/Honour-Based Abuse*

As of February 2023, the age of marriage has been increased to 18 years old. Forcing a person into a marriage is a crime in England and Wales. In addition, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff should be aware that family and community pressures can result in multiple perpetrators.

A child who is being forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Significant harm is defined as a situation where a child is suffering, or is likely to suffer, a degree of physical, sexual and / or emotional harm (through abuse or neglect), which is so harmful that there needs to be compulsory intervention by child protection agencies into the life of the child and their family.

The reasons given by parents who force their children to marry include protecting their children, building stronger families, strengthening family links, protecting family honour (e.g. promiscuity or homosexuality), retaining or acquiring wealth, appeasement etc.

Suspicious that a child may be forced into marriage include:

- A family history of older siblings leaving education early and marrying early;
- Depressive behaviour including self-harming and attempted suicide;
- Unreasonable restrictions such as being kept at home by their parents ('house arrest') or being unable to complete their education;
- A child being in conflict with their parents;

- A child going missing / running away;
- A child always being accompanied including to school and doctors' appointments;
- A child talking about an upcoming family holiday that they are worried about, fears that they will be taken out of education and kept abroad; or
- A child directly disclosing that they are worried s/he will be forced to marry.

Information about a forced marriage may come from one of the child's peer group, a relative or member of the child's local community, from another professional or when other family issues are addressed, such as domestic violence between parents.

Situations where a child fears being forced into marriage have similarities with both domestic violence and honour-based abuse. Forced marriage may involve the child being taken out of the country (trafficked) for the ceremony, is likely to involve non-consensual and/or underage sex, and refusal to go through with a forced marriage has sometimes been linked to so-called 'honour killing'.

Professionals should respond in a similar way to forced marriage as with domestic violence and honour-based abuse (i.e. in facilitating disclosure, developing individual safety plans, ensuring the child's safety by according them confidentiality in relation to the rest of the family, completing individual risk assessments etc).

If staff have a concern regarding a child who might be at risk of honour-based abuse or has suffered from honour-based abuse, they should speak to the DSL (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where Female Genital Mutilation appears to have been carried out on a girl under 18 years old, teachers must personally report it to the police. Unless the teacher has good reason not to, they should also discuss any such case with the DSL (or a deputy) who will involve local authority children's social care as appropriate.

### *Radicalisation*

Terrorism is defined in KCSIE 2023 as "an action that endangers or causes violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause".

Extremism is defined in KCSIE 2023 "is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces."

Radicalisation is referred to in KCSIE 2023 as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."

Possible indicators to support this identification include:

- Displaying feelings of grievance and injustice
- Feeling under threat
- Searching for identity, meaning and belonging
- Who have a desire for status amongst their peers

- Shows empathy for extremist causes
- Glorifying violence, especially other faiths or cultures
- Who have a desire for excitement and adventure
- Displaying a need to dominate and control others
- Who have a susceptibility to indoctrination
- Displaying a radical desire for political or moral change
- Who are susceptible to opportunistic involvement
- Who have family or friends involved in extremism
- Susceptible to being influenced or controlled by a group
- With relevant mental health issues
- Secretive behaviour
- Advocating messages similar to illegal organisations or other extremist groups

# Disclosures and Reporting

## Where a learner makes a disclosure:

Staff may have a concern about a child / young person's wellbeing, based on:

- Something the learner/carer has told you
- Something you have noticed about the learner's behaviour, health, or appearance
- Something another professional said or did

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are okay or if you can help in any way.

Even if you think the concern is minor, the DSL may have more information that, together with what you know, represents a more serious worry about a child. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small. Under no circumstances should you ask a vulnerable learner to remove an item of clothing to show you a bruise or other injury that is not visible.

## Following a disclosure

There are four key steps to follow to help staff identify and respond appropriately to possible abuse and/or neglect.

1. Be alert
2. Question behaviours
3. Ask for help
4. Refer

It may not always be appropriate to go through all four stages sequentially, if a child is in immediate danger or is at risk of harm, the DSL must refer to police or social care without delay, so it is important staff share any concerns in a timely manner to ensure children are safe.

If a vulnerable learner makes a disclosure, the following guidelines should be followed:

- React calmly so as not to frighten or worry the learner
- Allow the vulnerable learner to make the disclosure at their own pace and in their own way
- Avoid interruption, except to clarify what the vulnerable learner is saying
- Under no circumstances should you probe for information that is not offered voluntarily.
- Treat any allegations extremely seriously and act towards the child as if they believe what they are saying
- Tell the child that they are right to tell you
- Reassure the child that they are not to blame
- Be honest about their position, who they have to tell and why.
- Tell the child what they are doing and when, and keep them up to date with what is happening.
- Wherever possible, record the key elements of the disclosure

The person receiving the disclosure should not:

- Panic
- Allow their shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Approach the alleged abuser
- Interrogate the child. It is the job of the experienced police and social services to investigate the situation
- Cast doubt on what the child has told them and not to interrupt or change the subject
- Say anything that makes the child feel responsible for the abuse

No member of staff or tutor working within The Conservatoire must at any time agree to learner's request to 'keep a secret' if a learner wishes to make a disclosure. They must inform the learner that they may have to share what they are told with others if the contents of the disclosure are putting the learner at risk or are impacting negatively upon their welfare and well-being.

It is not up to the staff or tutors to decide whether a child or young person or vulnerable adult is suffering from harm as a result of neglect or abuse, but it is up to the individual (responsible adult) to report any concerns as soon as possible to the name person within the organisation. It is not wrong to be concerned about the well-being of a vulnerable learner and their well-being and staff and tutors should be adopt a "better to be safe than sorry" approach. The important factor is how responsible adults react and respond.

Staff should make a written record **as soon as possible after an incident and always within the same day it occurred**, noting:

1. Name of child
2. Date, time and place
3. Who else was present
4. What was said / What happened / What you noticed, for example, speech, behaviour, mood, drawings, games or appearance
5. If child or parent spoke, record exactly what they said rather than your interpretation
6. What you observed and why it is a cause for concern

### **Reporting procedure for staff**

Staff should report suspicions or disclosures of abuse to either:

- Executive Director (Designated Safeguarding Lead),
- Artistic Director (Deputy Designated Safeguarding Lead)
- Operations Director (Deputy Designated Safeguarding Lead).

It is vitally important that any disclosure made in confidence is recorded factually, accurately and as soon as possible on the day of the incident.

The Executive Director will then use appropriate reporting systems for the situation. This may be reporting the matter to social services or the police. Report forms are freely available in Reception or can be

downloaded from the Conservatoire Website. Completed forms will be signed by the Chair of the Board and stored safely to ensure confidentiality.

If it is thought that returning the learner home would put them in immediate danger, advice will be sought from social services.

### **Making a Report**

Those making a report should make their best effort to complete forms as accurately and completely as possible. They should not attempt to interpret what has been said or give their own opinion. Reports should record the learner's own words wherever possible.

The report should include everything that was said and done including:

- The nature of the allegation.
- A description of any visible bruising or other injuries.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred. Please indicate on the body map in Appendix 4.
- Witnesses to incident.
- The date and time of what has occurred
- The names of people involved
- What was said or done by whom
- Any action taken by the group to gather information and refer on
- Any further action e.g. suspension of a volunteer
- Where relevant, reasons why there is no referral to a statutory agency
- Names of person reporting and to whom reported

### **Confidentiality in Reporting**

In the event of any member of staff or Tutor becoming aware of or expressing concern about a learner's welfare and well-being, the member of staff or Tutor *must* immediately inform the Nominated Person with responsibility for Safeguarding. The Conservatoire recognises that all matters relating to safeguarding vulnerable learners is confidential.

All those who perform services on behalf of The Conservatoire should only receive and/or circulate personal information about a vulnerable learner on a need-to-know basis.

All those who perform services on behalf of The Conservatoire must be aware that they cannot promise to keep any disclosure made by a vulnerable learner a secret as this may compromise the person's safety or well-being of that learner or another.

### **Case Escalation**

If the child is in danger, or at risk of harm, then staff should contact the Police immediately. Do not wait for others to do so.

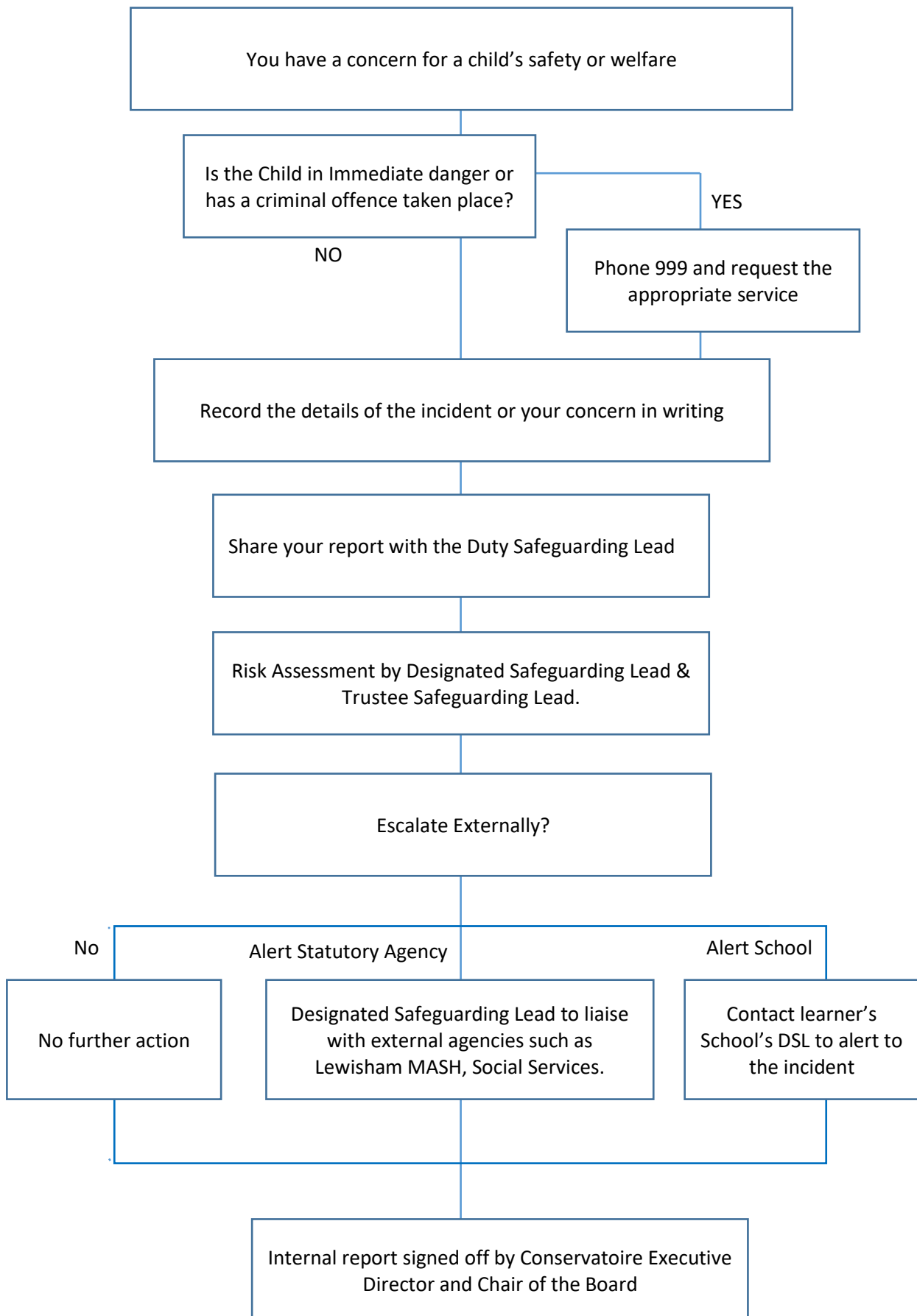
All submitted Safeguarding cases will be escalated to the DSL who will review with the Trustee Lead for Safeguarding. There are clear guidelines in KCSIE for further escalation to the Local Authority Designated Officer (LADO).

Following these guidelines, cases will be escalated to the LADO in the following instances:

- A police investigation of a possible criminal offence
- Children's Social Care (section 47 of the Children Act 1989) enquiries and/or assessment about whether a child is in need of protection or services
- Consideration by an employer of disciplinary action
- Whether action in regards to the person making the allegation should be considered where the allegation has no foundation and may be malicious



# Safeguarding Reporting Flowchart



## Whistle-blowing

It is difficult to expect vulnerable learners to raise concerns in an environment where staff fail to do so. Therefore, all staff, Tutors, volunteers and others working within the constructs of The Conservatoire should be aware of their duty to raise concerns about the attitude or actions of a colleague. If necessary, they should speak to the nominated Safeguarding Lead or Second Designated Person within The Conservatoire.

All incidents of whistle-blowing will be treated as confidential. If, however, upon investigation it is found that allegations made via this route are malicious, The Conservatoire reserves the right to take action against the person making a malicious or mischievous allegation.

### **Allegations against staff, tutors, volunteers or others working within the Conservatoire**

Conservatoire staff, tutors, volunteers, trustees and others, should take care not to place themselves in a vulnerable position with any learners whether designated vulnerable or otherwise.

The Conservatoire understands that a vulnerable learner may make an allegation against a member of staff, volunteer or other. If such an allegation is made to the Conservatoire, the member of staff receiving the allegation shall immediately inform the Executive Director or the Deputy Designated Safeguarding Lead if the Executive Director is not present. If the allegation made to a member of staff concerns the Executive Director, the person receiving the allegation will immediately inform the Chair of the Board, who will consult the Local Authority or the Police, as appropriate.

Following any allegation, the Executive Director, in consultation with the Chair of Trustees, shall decide whether it is appropriate to suspend the member of staff, tutor, volunteer or other, from all work and any contact with learners and staff at The Conservatoire whilst the allegation is being investigated. The investigation will be carried out by the Executive Director or Second Designated Person who will interview any relevant individuals. The Safeguarding Lead will inform the Trustees of the outcome of the investigation and, where the allegations are found to be partially or wholly substantiated, the Executive Director, in consultation with the Chair of the Trustees, shall decide what further actions should be taken against the individual concerned. If appropriate, this would include informing the police. The person making the allegation and any appropriate parent/carer/guardian will be informed of the outcome of the investigation.

Any member of staff, tutor, volunteer or trustee being convicted of a criminal offence of a nature which impacts on the appropriateness of them working with vulnerable learners has a legal obligation to immediately notify the Executive Director who, after consultation with the Chair of the Trustees, will consider whether the said employee, contractor or volunteer should continue their involvement with the organisation. The Conservatoire reserves the right to withdraw offers of employment with immediate effect.

If any of the following incidents should occur, you should report them immediately to the DSL or one of the deputies and make a written note of the event. Parents, guardians and carers should also be informed of the incident:

- if you accidentally hurt a learner
- if he/she seems distressed in any manner
- if a learner appears to be sexually aroused by your actions

## Safer Recruitment

The Conservatoire recognises that sometimes people who want to cause harm to vulnerable learners actively seek employment that provides them access to young people. We will protect our learners from having to come into contact with people with the propensity to cause harm by thorough and rigorous scrutiny of all applications.

We make use of the Safer Recruitment Consortium – and our code of conduct is based on the *Guidance For Safer Working Practices For Adults Who work With Children In Educational Settings*.

We will:

- Verify applicant's identity
- Check applicant's qualifications/experience/ employment/history
- Carry out online searches for all shortlisted candidates.
- Obtain professional and character references
- Check applicant's health and physical capacity to undertake the job
- Hold a face-to-face interview for all candidates with at least one member of the Conservatoire's panel who has attended safer recruitment training
- Ensure all adults in regulated activity with the children have been DBS checked and barred list checked.
- Make staff aware of their contractual, legal, administrative and pastoral responsibilities. A key document to support staff's understanding in this area is 'Keeping Children Safe in Education' (2023) which will be made available to all staff.

In recruiting and appointing staff, the Conservatoire's Executive Director and Board have key responsibilities to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse vulnerable learners.

### **Advertising / Shortlisting / Interviews**

We ensure that the advertisement makes clear the Conservatoire's commitment to safeguarding and promoting the welfare of children. All job descriptions make reference to the responsibility for safeguarding and promoting the welfare of children. All person specifications include specific reference to suitability to work with children. Shortlisted candidates will be informed that online searches will be undertaken as part of the Conservatoire's due diligence checks. We ask for written information about previous employment history and check that information is not contradictory or incomplete. If a candidate for a teaching post is not currently employed as a tutor or teacher, we will check with the most recent employer to confirm details of their employment and their reasons for leaving.

We will always seek at least two references to obtain objective and factual information to support our appointment decisions. These will be scrutinised and any concerns need to be resolved satisfactorily, before the appointment can be confirmed.

We endeavour to seek references on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview. We will always request references directly from the referee and employers and will not rely on open references, for example in the form of 'to whom it may concern' testimonials.

On receipt, references will be checked by the Executive Director or another senior member of staff to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate: for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate. Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post. We verify that the successful applicant has all the academic or vocational qualifications claimed. We check his or her previous employment history and experience. We conduct a face-to-face interview that explores the candidate's suitability to work with children as well as his or her suitability for the post. We verify the successful applicant's identity, when they arrive for an interview.

### **Offer of appointment**

An offer of appointment to a successful candidate, including one who has lived or worked abroad, will be conditional upon satisfactory completion of our pre-employment checks. Before new staff are appointed, we will:

- Verify a candidate's identity from current photographic ID and proof of address;
- Obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities.

### **Recording DBS information**

- The DBS document number and date of issue (and date of check if on the Update service) should be recorded under the Tutor information section on the Single Central Record.
- ID documents should be stored as e-copies on the Conservatoire's Sharepoint server. Scans or paper copies of the DBS should not be stored long-term in either paper or e-format.
- Our agency usually produces DBS checks within one or two days but occasionally DBS checks can take several weeks to complete, which can make it difficult to ensure that this is done before someone starts working. Any contract of employment or for services will be subject to a valid DBS check being done within 3 months of starting work at the Conservatoire. A risk assessment will be carried out and appropriate action to mitigate risks will be taken.

## **Additional checks on individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff. In addition, we will make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered.

We will verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow the guidance on the GOV.UK website.

All statutory schools have a statutory duty under the new Home Office guidance issued on 6 April 2017, which states that:

*"All Tier 2 (General) visa applicants who want to work in specified health, education or social care sectors must provide a criminal record certificate and so for all new appointments, schools must consider additional checks, including obtaining a Certificate of Good Conduct, where staff have ever lived or worked abroad".*

The requirement is applicable to all Tier 2 (General) staff from any country (excluding the United Kingdom and Northern Ireland), where an individual has lived or worked for more than 12 months either in total or continuously as well as within the previous 10 years.

We will risk assess all prospective employees/volunteers/trustees who declare that they have lived or worked outside the UK, within the last ten years, for more than 12 months either in total or continuously since the age of 18 years, to determine the level of additional checks required. This must check be done for each separate country where the person has spent more than 12 months.

## **Deputies**

Tutors are responsible for ensuring that their deputies have an Enhanced DBS document with a Children's Barring List check no older than three years. These must be provided to Reception and a scan taken and sent to the Programme Manager before deputies can teach.

A risk assessment will be undertaken for deputies that have within the last ten years lived or worked outside the UK for more than 12 months, either in total or continuously since the age of 18 years to determine the level of additional checks required.

## Single Central Record

We keep a single central record for the Conservatoire's staff, tutors and volunteers. This document records whether the following checks have been carried out or certificates obtained, and the date on which the checks were completed:

- identity check
- barred list check
- enhanced DBS check
- prohibition from teaching check where possible
- further checks on people living or working outside the UK where possible
- checks of professional qualifications
- check to establish the person's right to work in the United Kingdom.

The single central record will cover the following people:

- Staff (including tutors and supply staff)
- Others who work in regular contact with children at the Conservatoire including volunteers.
- Trustees

In order to comply with the requirements of the Data Protection Act, we will not retain a copy of the individual's Disclosure and Barring Service (DBS) Certificate. However, copies of other documents used to verify the successful candidates identity, right to work and required qualifications will be kept on their personnel file.

### **Volunteers E.g. Parents/Carers and Work Experience Students**

Under no circumstances should a volunteer or work experience student in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

We will obtain an enhanced DBS certificate with barred list check for all volunteers in regulated activity who will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis. However the Conservatoire may still choose to request one as they judge necessary but may not request a check of the barred list.

If a volunteer is not engaging in regulated activity and is therefore supervised at all times, e.g. a parents accompanying their children on a trip, the Conservatoire will undertake a risk assessment and use their professional judgement and experience, when deciding whether to seek an enhanced DBS check. A barred list check is legally not allowed under these circumstances.

### **Trustees**

Governing bodies must apply for a ~~enhanced criminal records certificate~~ basic DBS check for any trustee who does not already hold one. They must do this within 21 days of appointment. All new trustees will be asked to declare their overseas history and where necessary, we will complete a risk assessment and check as required, in line with our procedures.

# External Contractors

## Aims

The aim of the safeguarding measures will be to manage the risk of harm to pupils and vulnerable adults. The measures adopted shall be proportionate to the risk.

Safeguarding measures to be considered will include any or all of the following depending on the outcomes identified by the Conservatoire in their security risk assessment:

- Segregate - To avoid contact\* between contractors and pupils as far as possible
- Supervise - To supervise any contact\* that does take place with a member of staff or a suitably vetted volunteer
- Code of conduct - To require contractors to observe a code of conduct
- Regulate Access - To regulate access to the premises
- Checks - To undertake checks where appropriate.

\* 'Contact' in this context shall be taken to mean any opportunity for contractors' staff to converse with pupils or to communicate with them in any other way, e.g. by passing messages, without a member of staff or suitably vetted volunteer being able to monitor the contact and intervene where necessary.

## Segregate

The risk of harm to pupils can be managed if contact between non-vetted contractors' staff and pupils can be avoided altogether.

Segregation can be achieved by physical means or by time, or by a combination of both. For larger building projects lasting a number of weeks physical separation would normally be achieved by the contractors' staff working within secure areas behind fencing, hoardings, barriers and the like where pupils would normally be excluded for routine health and safety concerns (this practise is already adopted on all Property Services contracts). Outside such secure areas, separation can be maintained by confining the movements of the contractors' staff to specific areas and to specific times to avoid contact at break times and at the beginning and end of the working day. In this context, a marked-up plan agreed with the contractor to show where and at what times during the day access will be permitted would be useful.

For routine maintenance visits or for emergency repairs lasting less than a day physical separation can be achieved by simply confining the movements of contractors to within clearly defined areas and specific times. Should any contact between the contractors' staff and learners occur then it should be supervised by a member of staff or suitably vetted volunteer.

Where works are to be undertaken outside opening hours then safeguarding measures should be implemented for any learner attendance scheduled for this time.

## Supervise

Measures should always be instigated to segregate non-vetted contractors' staff from learners as much as is possible not just in the context of this document but also for H&S reasons. However, where such measures to segregate are in place but some contact may occur between non-vetted contractors' staff and learners then any such contact should always be supervised by a member of staff or suitably vetted volunteer.

The requirement to supervise can be limited to the times when contact is likely to occur, e.g. at break and class changeover times. It is not necessary to monitor the building works themselves, only any contact that might take place between the contractors' staff and learners.

### **Code of Conduct**

The code of conduct should be used to inform all contractors of what might be considered inappropriate behaviour. It will enable any inappropriate behaviour to be recognised and challenged by all concerned.

The code of conduct for contractors is given in Appendix #1. The Premises Manager should ensure that any order for works or building contracts include the clear condition that failure to observe the code will entitle the Conservatoire to exclude a member of a contractors' staff from the premises.

To ensure the effectiveness of any code it shall either be:

- Issued to contractors when quotations or tenders are invited
- Stated as a condition on any order for works or building contract no matter how or by whom the contractor is appointed
- Issued to all contractors by the Premises Manager when they first attend
- Before any work has commenced.

Additionally, where appropriate, the code should be:

- Highlighted and discussed in any pre-start meetings for larger building contracts
- Posted on the building site
- Posted on the Conservatoire notice board
- Included as part of any contractors site safety briefings
- Issued to contractors' staff

### **Identify**

A suitable means of identification shall be provided by all contractors and be agreed and produced for checking by the Conservatoire in advance of any works taking place. If a contractor fails to produce such ID they shall be refused entry to the site.

The means by which any contractors' staff are to be identified will be determined in each case to suit the location and nature of the work being undertaken. In the case of Conservatoire issued ID badges or contractors own photo ID, these shall be worn and be visible at all times when the contractor is on the site.

Typical methods may include:

- ID badges
- Photo ID
- Branded workwear
- Signing in book

Identification should only ever be used as a supplementary measure to the principal safeguarding measures of segregation and supervision.



## **Checks**

Whether or not contractors' staff should undergo a DBS check and ISA registration should be determined by a suitable risk assessment. Further advice may be sought from the Local Authority.

The risk assessment should take account of the likely amount of contact that the contractors' staff might have with learners, and other measures such as segregation and supervision have been considered. In some cases where measures to segregate and supervise are in place it may still be necessary to consider checks.

DBS checks would not be required where there would be no contact between contractors' staff and learners; for example, where a building was being built on a separate site, or where the works were to be undertaken outside opening hours. Although consideration must of course be given to extended activities on the site.

Similarly, DBS checks would not normally be required for contractors' staff working on site building an extension or undertaking repairs where they are segregated from learners and that any contact that did take place was supervised by the Conservatoires.

However, where a member of the contractors' staff is likely to have either frequent or prolonged contact with learners then it would be appropriate to obtain a check in addition to measures to supervise any contact. For example, a check may be appropriate where a contractors' representative (e.g. foreman, site manager, etc.) needs to liaise with Conservatoire staff on a day-to-day basis. A check may also be considered appropriate in the case of a contractors' representative where such staff are responsible for ensuring compliance with other safeguarding measures such as segregation, identification, code of conduct etc. Similarly, where contractors' staff regularly visit sites to undertake routine maintenance (boilers, electrical tests and the like) then a check may be deemed appropriate in addition to measures to supervise any contact.

Where checks are necessary then the contractor must confirm in writing to the Conservatoire that these are in place and the nature of these checks. However, under no circumstances should a member of a contractor's staff be allowed to have any unsupervised contact with learners, even those who have undergone a DBS check. It should be noted that not all contractors engaged by the Conservatoire will have been vetted in any way and DBS checks are not routinely requested unless specifically required due to the nature of the work they are undertaking.

The Trustee Safeguarding Lead should be contacted whenever specific guidance around checks via the Disclosure and Barring Service (DBS) or the Independent Safeguarding Agency (ISA) is needed.

## **Planning**

The safeguarding measures should be determined and agreed with any contractor well in advance of any planned works starting on site. This will enable sufficient time for Conservatoire staff to be briefed on the supervision required and on the access arrangements agreed with contractor and also enable checks where necessary to be completed and in place before works start.

## **Summary**

Wherever any type of building related work is undertaken of any duration, safeguarding measures shall always be implemented and include arrangements to segregate pupils from contractors' staff as far as reasonably practicable and for any contact between them to be supervised by a member of staff or suitably vetted volunteer.

Other steps such as codes of conduct, identification and DBS checks should be considered as supplementary measures where appropriate.

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**PERSONAL DECLARATION**

I have read, understood and agree to abide by the conditions of this policy in my capacity as a member of staff/tutor/trustee/volunteer working at The Conservatoire.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

**July 2024**

## Appendix 1 – Safeguarding Code of Practice for staff, tutors, trustees and others working within The Conservatoire

Any Conservatoire staff, tutor, volunteer, trustee or contractor working on behalf of The Conservatoire should observe the following guidelines as a matter of course, and in order to protect themselves from false allegations.

Everyone should recognise that their actions both inside and outside of the Conservatoire can impact on both their own and the Conservatoire's public reputation.

The general expectations of conduct are as follows:

- Treat learners with respect and understand the difference between friendliness and familiarity
- Act as a role model of good and appropriate professional behaviour
- Respect the learner's right to personal privacy
- Ensure that physical contact is appropriate and kept to a minimum
- Never touch a vulnerable learner in a way which could be misunderstood or misconstrued
- Challenge unacceptable behaviour
- Build balanced relationships based on mutual trusts which empowers learners to share in the decision-making process
- Give enthusiastic and constructive feedback rather than negative criticism
- Recognise the developmental needs and capacity of young learners
- Have an awareness of any medicines being taken by participants, or existing injuries;
- Refuse to allow learners to use inappropriate language unchallenged
- Refuse to allow bullying of one learner by another to go unchecked
- Wear ID badges in the venue

Specifically,

- Ensure an adequate ratio of tutor/staff to vulnerable learners which is appropriate to the activity being undertaken and to take account of gender differences. For all group classes, the maximum number of young learners to tutors will be 8:1. For Early Years (aged 0-3 years), parents accompany their children's activities at all times. From ages 3-5/6, parents may stay in class with their children. Between ages 5/6-18, parents do not usually accompany children to class but are always welcome to attend if required.
- Learners taken ill – where a vulnerable learner is taken ill, the tutor should accompany them to Reception, if taking an individual lesson, where their carer should be called. If the learner is in a group class, the tutor should contact Reception and arrange for the learner to be taken there.
- Learners under the age of eight should be supervised on the way to the toilet when there are other members of the public in the building. Tutors to exercise discretion for older learners who may need additional supervision. Parents are asked to ensure that their children have visited the toilet ahead of their class starting.
- All tutors should ensure vulnerable learners are picked up from class by a known carer after the class. Where a learner is left after a class without being picked up by a carer, they should be taken to Reception by the tutor.
- Where a vulnerable learner is found unsupervised in the Creativity Garden, a member of staff should take them to Reception.

- Apart from one-to-one teaching situations in the music rooms of The Conservatoire, a tutor should endeavour never to be alone with a vulnerable learner and, should such a situation arise, every effort should be made to ensure that others can either see or hear the tutor at work.
- Emails regarding vulnerable learners should be sent to the parent/guardian from a Conservatoire email address.
- Staff and tutors should never become “friends” or communicate with learners on Facebook or other social networking sites.
- Staff and tutors should not give gifts to children.
- Be fair and balanced in their recognition of learners’ achievements and the use of praise.
- Dress appropriately, i.e. in a way that:
  - is unlikely to be viewed as offensive, revealing or sexually provocative;
  - does not distract, cause embarrassment or give rise to misunderstanding;
  - is absent of any political or contentious slogans;
  - is not considered to be discriminatory or culturally sensitive.
- Learners’ personal data must be kept secure

***The parents of all learners under the age of 16 should sign a declaration of permission for photographic and recorded images to be used for publicity purposes. For images being used on social media sites, this needs to be explicitly communicated. Images of any learners should only be collected by permanent staff members of the Conservatoire or with their permission. Photographs should not be taken for staff or tutors’ personal collection***

## Appendix 2 – Code of Conduct for Contractors and Sub-Contractors

Everyone has responsibility for safeguarding and promoting the welfare of children, young persons under 18 years of age and adults at risk. As an external provider of services to the Conservatoire, you are asked to ensure that any person engaged on the contract, either directly employed by you or through subcontract arrangements, agrees to comply with the following:

1. to work safely and take responsibility for their own actions and behaviour;
2. to avoid any contact with a child, young person under 18 years of age or vulnerable adult which would lead any reasonable person to question their motivation and intentions;
3. not be in contact with a child, young person under 18 years of age or adult at risk whilst on site, unless accompanied by a colleague;
4. not give their personal contact details (including mobile number) to children, young people under 18 years of age or adults at risk;
5. not to make contact via social network sites with children, young people under 18 years of age or adults at risk;
6. to work and be seen to work in an open and transparent manner;
7. to wear an approved means of identification which include a photograph at all times;
8. to remain within the agreed work area and/or access locations;
9. to keep colleagues informed of their whereabouts;
10. to not use profane or inappropriate language;
11. to dress appropriately, i.e. dress in a way that:
  - is unlikely to be viewed as offensive, revealing or sexually provocative;
  - does not distract, cause embarrassment or give rise to misunderstanding;
  - is absent of any political or contentious slogans;
  - is not considered to be discriminatory and is culturally sensitive.

REMEMBER: Your actions, however well intended, could be misinterpreted. Be mindful to avoid placing yourself in vulnerable situations.

## Appendix 3 – Safeguarding Incident Report Form

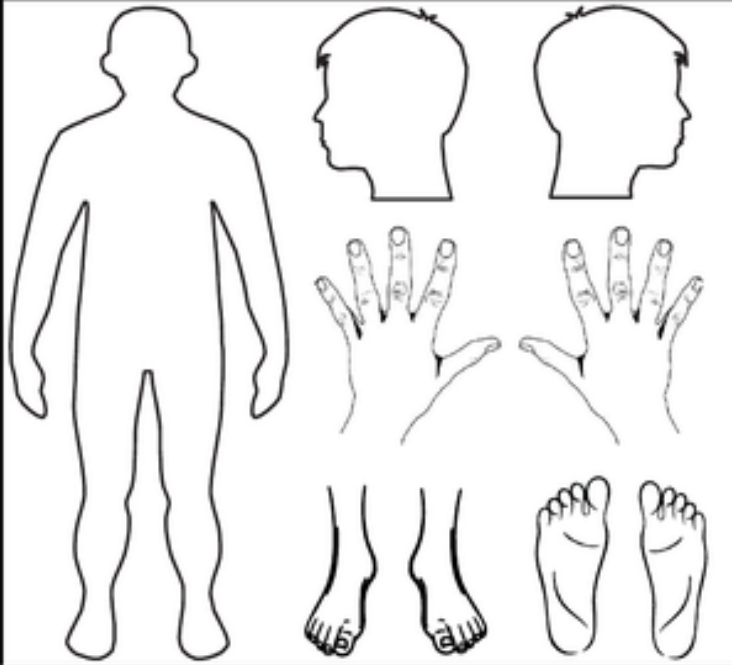
<b>Your Name:</b>
<b>Your Position:</b>
<b>Child's Name</b>
<b>Child's Address:</b>
<b>Parent/Carer/Guardian Name and Address:</b>
<b>Child's School</b>
<b>Child's Date of Birth</b>
<b>Date and Time of any Incident</b>
<b>Your Observations</b>
<b>Exactly What the Child Said and What You Said (Record actual details. Continue on separate sheet if necessary)</b>

<b>Action Taken so far:</b>	
<b>External Agencies Contacted (Date &amp; Time)</b>	
<b>Agency</b>  <b>Name and Contact Number</b>	<b>Details of Communication</b>
<b>Agency</b>  <b>Name and Contact Number</b>	<b>Details of Communication</b>
<b>Final Outcome:</b>	
<b>Signature:</b>  <b>Print Name:</b>	
<b>Date:</b>	

Signed.....  
Patrick Holden, Executive Director

Signed.....  
Chair of the Board

Appendix 4 – Disclosure Body Map

<b>CHILD PROTECTION BODY MAP</b>	
	<b>Name of child:</b> .....
	<b>Date of birth:</b> .....
	<b>Staff member raising concern:</b> .....
	<b>Date recorded:</b> .....
	<b>Observations:</b> ..... ..... .....



## Contact Details

All incidents concerning child protection should be reported to the Designated Child Protection Policy Officer. If this person is unavailable you should report to the Deputies.

Please see contact details below:

### **Designated Safeguarding Lead**

Patrick Holden, Executive Director

[patrick.holden@conservatoire.org.uk](mailto:patrick.holden@conservatoire.org.uk)

Tel: 020 8852 0234

### **Deputy Designated Safeguarding Lead**

Mairead Sheerin, Artistic Director

[mairead.sheerin@conservatoire.org.uk](mailto:mairead.sheerin@conservatoire.org.uk)

Tel: 020 8852 0234

### **Deputy Designated Safeguarding Lead**

Dee De Bellotte, Operations Director

[dee.debellotte@conservatoire.org.uk](mailto:dee.debellotte@conservatoire.org.uk)

Tel: 020 8852 0234

### **Conservatoire Trustees**

*Trustee Safeguarding Lead - Emma Smillie*

[emmaparkere14@gmail.com](mailto:emmaparkere14@gmail.com)

Tel: 020 8852 0234

*Co-Chair – Clare Cornwell*

[clare.cornwell@btinternet.com](mailto:clare.cornwell@btinternet.com)

Tel: 020 8852 0234

*Co-Chair – Jane Burton*

[jane.burton28@gmail.com](mailto:jane.burton28@gmail.com)

Tel: 020 8852 0234

## Support Services

### **POLICE**

#### **Police Station – Lewisham**

Lewisham Police Station  
43 Lewisham High Street  
SE13 5JZ  
Tel: 101  
Tel: 0208 297 1212

#### **Greenwich West Police Station (rarely manned)**

Tel: 0208 649 3536  
WestGreenwich.SNT@met.police.uk

### **LOCAL AUTHORITY CHILD PROTECTION SERVICES**

#### **Greenwich Children’s Services – Child Protection team**

Referral Team: 0208 921 3172  
Tel: 020 8854 8888 Out of Hours Emergency Duty Team  
[Mash-referrals@royalgreenwich.gov.uk](mailto:Mash-referrals@royalgreenwich.gov.uk)

#### **Local Authority Safeguarding Contacts:**

LADO, Caroline Aitken - [Caroline.Aitken@lewisham.gov.uk](mailto:Caroline.Aitken@lewisham.gov.uk).

#### **Lewisham Multi-Agency Safeguarding Hub (MASH)**

Tel 0208 314 6660  
Out of Hours Emergency Team: 0208314 6000

The Conservatoire is in Greenwich Borough and is deemed a school for safeguarding purposes and has had help and advice from Ken Palmer, Child Protection Co-ordinator – schools

Tel: 020 8921 4438  
[Ken.Palmer@royalgreenwich.gov.uk](mailto:Ken.Palmer@royalgreenwich.gov.uk)

#### **Childline 0800 1111**

**NSPCC Child Protection Helpline: 0808 800 5000**

## Legal and Procedural Framework

1989 The UN Convention of the Rights of the Child	Ratified in the UK in 1991. Includes many rights of protection for children including freedom from abuse and the right to have their views heard
1997 Sex Offenders Act	Register of sex offenders established. sex offenders are required to notify police of any changes to name or address
1998 Human Rights Act	Stresses the importance of protecting children and adults needing care and support
1998 The Data Protection Act	Regulates the handling of personal data, including that which a school or organisation working with children may handle relating to staff and learners
1999 The Protection of Children Act	Amalgamated police criminal records, List 99 and DoH consultancy index to create a single system for identifying people considered unsuitable to work with children. Criminal Record Bureau checks introduced
2000 No Secrets	Places a positive duty on public bodies to intervene appropriately to protect the rights of citizens
2000 The Sexual Offences (amended) Act	Made it an offence for any person aged 18 or over to engage in any sexual activity with a person under the age of 18 when they are in a position of trust in relation to the younger person
2000 Criminal Justice and Court Services Act	Courts are under an obligation to impose a disqualification order to prevent unsuitable people working with children on defendants aged 18 and over if convicted of violent or sexual crimes
2002 The Education Act	Requires local authorities and governing bodies of schools and further education institutions to make arrangements to safeguard and promote the welfare of children
2003 The Sexual Offences Act	Outlines a range of offences against children and adults with a mental health disorder
2003 Education (Prohibited from Teaching or Working with Children) Regulations	Changes to the barring regulations. Automatic barring offences extended to include child murder and possession of indecent photographs of children
2003 Disability Discrimination Act	Significantly extends the rights of disabled people
2005 Mental Capacity Act	Aims to protect people who cannot make decisions themselves due to a learning disability or mental health condition
2006 Safeguarding Vulnerable Groups Act	Strengthens local governance arrangements for safeguarding by placing adult safeguarding on a statutory footing
2012 Protection of Freedoms Act	Introduced changes to the vetting and barring regulations.

2015 Working Together to Safeguard Children	This incorporates the 15 recommendations of the Munro review into Child Protection (2010), and the interim report The Child's Journey (2011) and A Child-Centre System (2012)
Keeping Children Safe in Education (KCSIE) 2023	Statutory Guidance for schools and colleges on safeguarding children and safer recruitment

**Updated version 31/07/2024**

**Next Review – July 2025**