



Safeguarding Young People Policy

Updated December 2024

South West Music School (SWMS) is registered in England as a company limited by guarantee (Company No. 7307202) and a charity (Charity No. 1138482). Registered office: Bishop Fleming, 10 Temple Back, Bristol, BS1 6FL.

Introduction and Policy Statement of Intent

South West Music School (SWMS) is committed to safeguarding and promoting the welfare of children. Our aim is to promote an inclusive and safe learning environment that meets the needs of all pupils, and protect pupils from harm. We recognise that SWMS has a responsibility for the safety of the children and young people involved in our activities.

These policies apply to all staff, the board of trustees, employed staff, freelance staff, temporary staff, mentors, workshop leaders, musicians, volunteers, partner organisations, contractors and third parties working on behalf of South West Music School.

Purpose of the SWMS Safeguarding Young People Policy

The purposes of this policy are:

- To set out how SWMS will safeguard young people through processes, procedures, and organisational culture.
- To give guidance to trustees, employees, house parents, tutors and mentors about their safeguarding responsibilities and what procedures they should adopt if they suspect a young person may be experiencing, or is at risk of, harm.

Safeguarding Principles

We recognise that:

- The well-being and safety of each student is our primary concern
- We have a responsibility for the safety of all children and young people taking part in our activities, regardless of age, disability, gender, race, religious belief or lack thereof, sexual orientation or identity, in line with our Equal Opportunities policy.
- We respect the rights of every child we work with.
- Relationships between staff, freelance staff and children should be based on mutual trust and respect.
- Working in partnership with children and young people, their parents/carers and other agencies is essential in promoting children's welfare.
- The feelings and concerns of any child or their parent/carer are respected, listened to and acted upon.
- In creating the SWMS Safeguarding Young People Policy, we have referred to advice, guidance and legislation to ensure the policy is up to date, **please see Appendix 1.**

We will seek to safeguard young people by:

- Assigning clear roles and responsibilities to individuals who are accountable and responsible for safeguarding.
- Ensuring that trustees, employees, and freelance workers are aware of the risks of harm to young people and that clear lines of communication and reporting are in place.
- Ensure that all students are aware of how to report any safeguarding concerns they may have either regarding themselves or others.
- Ensure that all trustees, employees, tutors, mentors and house parents undergo CPD accredited safeguarding training on a regular basis, linked to up-to-date Government guidelines.
- Ensuring that recruiting trustees, employees and freelance workers is done safely, and that all necessary checks are made, with appropriate training provided.
- Assessing risk in relation to all activities, and making risk assessment documents available to all employees and freelance workers engaged in the activity. Recognising all risk assessments are living documents, to be updated and referred to before, during and after activities.

We recognise that any serious or significant incidents should be reported to the Department of Education Grant Manager immediately for information purposes and to provide advice.

Review

This policy will be reviewed on a yearly basis by the General Manager and Designated Safeguarding Lead and updated where appropriate. A copy of this current policy document will be available on our website, www.swms.org.uk

October 2024

Emergency Numbers

SWMS DSL (Jennie Troup) 07515 902847

SWMS General Manager (Tracy Hill) 07970 553794

NSPCC Helpline 0808 800 5000

NSPCC Sexual Harassment & Abuse In Education 0800 136663

Victim Support Helpline 0808 1689 111

Cornwall Multi Agency Referral Unit (MARU) 0300 123 1116

Devon Multi Agency Safeguarding Hub (MASH) 0345 155 1071

Portsmouth Multi Agency Safeguarding Hub 0300 5551373

Plymouth Multi Agency Safeguarding Hub 01732 668000

Wiltshire Multi-Agency Safeguarding Hub (MASH) 0300 456 0108

Bristol First Response Team 0117 903 6444

South Gloucestershire Front Door Service 01454 866000

Gloucestershire Front Door Service 01452 426565

National Prevent Advice Line 0800 011 3764

Whistleblowing Advice: NSPCC: 080 8800 5000

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Safeguarding Structure at SWMS

Roles and Responsibilities

General Manager	Tracy Hill
Designated Safeguarding Lead	Jennie Troup
Lead Trustee for Safeguarding	Dr Oliver Leaman

The Designated Safeguarding Lead is responsible for:

- Overseeing annual DBS checks of trustees, employees, and freelance workers
- Arranging enhanced DBS checks of potential new trustees, employees, and freelance workers, as appropriate
- In collaboration with the General Manager, overseeing updates and renewals to this policy
- Overseeing safeguarding decisions regarding young people
- Ensuring safeguarding concerns are acted upon correctly and in accordance with the Safeguarding Policy
- Reporting to the General Manager on safeguarding concerns
- Reports to the Board of Trustees on major safeguarding incidents and updates to policies and practices
- Ensuring that suitable CPD safeguarding training is provided and undertaken by employees, trustees, and freelance workers, as appropriate
- Writing Risk Assessment documents for all activities, sharing and discussing with relevant employees and freelance workers

The Lead Trustee for Safeguarding is responsible for:

- Identifying organisational risk from safeguarding incidents and supporting the Safeguarding Lead in overseeing safeguarding decisions.
- Ensuring that the Board of Trustees are given appropriate levels of information about safeguarding practices and incidents and can assess organisational risk.

All trustees, employees and freelance workers are responsible for:

- Adhering to the SWMS Safeguarding Policy and following the practices and behaviours expected.
- Being vigilant to the signs that may indicate that a young person is experiencing harm or is at risk of harm.
- Following SWMS guidance when receiving disclosures from a young person.
- Understanding the SWMS safeguarding structure and following SWMS reporting procedures by reporting any concerns to the Designated Safeguarding Lead.
- Full details of staff responsibilities will be detailed in employment contracts.

House Parents Team for Residential Courses

The House parenting team have a safeguarding responsibility and take a leading role in dealing with safeguarding incidents and concerns during SWMS residential courses. The team will meet ahead of each residential course to familiarise and discuss the risk assessment document, identifying specific risks relating to the course, personnel, and venue, as appropriate. The team will liaise and report directly to the Designated Safeguarding Lead present on site.

All young people, parents and carers will be informed of the House Parent team ahead of the residential, noting the on-site Safeguarding Lead responsible for responding to, and making decisions about safeguarding or Child Protection situations.

Training

All adults who work with SWMS students will be required to have an appropriate level of Safeguarding Training.

Safeguarding training will be delivered online by a CPD accredited training company. The level of training required is determined by the level of contact with young people and the role that they play in their interactions. All adults involved with SWMS have a responsibility to foster an environment of positive pastoral care and promote the welfare of young people.

All safeguarding training will be refreshed every 2 years.

Roles	Individuals who:	Training Required
Designated Safeguarding Lead General Manager	Have responsibility and accountability for safeguarding	Level 3 Safeguarding Training
SWMS Pastoral Team	Have operational responsibility for safeguarding during residential courses	Level 2 Safeguarding Training
SWMS Admin employees and Trustees	Work in the management team at SWMS but have limited contact with young people and no direct impact on safeguarding	Level 1 Safeguarding Training

SWMS Regular Tutors and Mentor team	Have infrequent, direct contact with young people, but do not have direct responsibility for safeguarding and/or are supervised	Level 1 Safeguarding Training
Guest tutors	Attend a SWMS activity for a short amount of time and will not have any unsupervised direct contact or interactions with Young People	Introduction to Safeguarding briefing ahead of the activity

DBS Checks	All adults with direct contact with young people will be required to have an Enhanced DBS Check. SWMS processes DBS checks via Devon County Council Safer Recruiting Services.
SWMS Safeguarding Young People Policy	All adults will be required to read and acknowledge the SWMS Safeguarding Policy as part of their contract agreement.
SWMS Safeguarding Training	Safeguarding Training will be provided by a CPD accredited online training company and will be renewable every 2 years.
Safeguarding Briefing	Safeguarding briefings for guest tutors will be provided by a member of the team with Level 3 Safeguarding training. This will include an overview of the SWMS Safeguarding Policy and discussing appropriate information taken from the relevant activity's Risk Assessment.
Safeguarding Briefing ahead of all Residential Courses	Prior to the start of all residential courses, the Pastoral Team will receive a site orientation tour and safeguarding briefing to discuss the course Risk Assessment and overview of the SWMS Safeguarding Policy

Recruitment and induction of employees and freelance staff

When recruiting or contracting adults to work with SWMS students the following procedure will be undertaken.

- Consent will be obtained from an applicant to apply for an enhanced Disclosure and Barring Service check via Devon County Council Safer Recruiting Team.
- Applicants will be informed that online searches will be carried out.
- Evidence of identity will be required (eg passport or driving licence with photo)
- Once a clear check has been confirmed, SWMS will issue a contract including terms of engagement.
- A link to all policies is provided by SWMS as part of the contractual agreement.
- All contracted individuals should sign and return the contract to show they have read and understood and agree to follow SWMS code of conduct and Child protection procedures as part of their contractual obligation.
- All contracted individuals will be provided with the appropriate level of Safeguarding training, as indicated in the above table.

South West Music School is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.

We are an equal opportunities employer, fully committed to creating and ensuring a non discriminatory, inclusive, and respectful working environment for all our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Examples of good practice in this area:

- Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support Modern Slavery. We make our processes known to potential staff and suppliers as a means of encouraging good practice.
- We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them.
- We also ensure that any recruitment agency we use for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.

Interview and induction permanent staff

All permanent staff will be required to undergo an interview, in line with the charity's Equal Opportunities Policy. All employees should receive a formal induction where safeguarding procedures and health and safety policies will be explained.

Identifying Safeguarding Concerns

At times SWMS staff may have to respond to concerns about the welfare of children and young people through observation or disclosures made.

All trustees, employees, freelance workers, and volunteers should be vigilant to the behaviours of young people and should be concerned if they exhibit unusual behaviours. This section outlines some of the things to look out for if a young person:

- Shows changes in behaviour and fails to develop through the contact that they have with other young people on residential courses.
- Has an injury which is not typical of a young person's bumps and scrapes, regularly has unexplained injuries, or frequently has injuries and/or gives confused or conflicting explanations of how injuries were sustained.
- Exhibits significant changes in performance or attitude.
- Exhibits extremist beliefs that may infer the young person has been 'radicalised'.
- Indulges in sexualised behaviour which is unusually explicit / inappropriate for their age.
- Discloses an experience in which they may have been harmed.

Types of abuse, neglect and exploitation, and abuse, neglect and exploitation indicators

There are four categories of abuse as defined under the Children Act 1989:

Physical abuse	Include physical chastisement, deliberate, malicious injuries, inappropriate restraint, lack of supervision resulting in accidents and harm
Neglect	Failure to meet a young person's needs – physical and psychological. Includes the failure to protect a child from exposure to danger resulting in impairment of a child's health and/or development
Emotional abuse	Includes persistent ridicule, rejection, humiliation, an atmosphere of fear, intimidation, inappropriate expectations, bullying and scapegoating
Sexual abuse	Includes giving child access to pornographic images, involving them in sexual activity or talking in sexually explicit ways

In addition, there may be occasions when a young person will disclose historic abuse from their past, This should always be treated in exactly the same way as a disclosure or suspicion of current child abuse as the abuser may still represent a risk to children now. Abusers can be both adults and other young people.

Peer-on-peer abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, or coercive control, exercised between children and within children's relationships. Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, sexual abuse, and/or gender-based violence.

Bullying is a particularly harmful form of emotional abuse which can occur between peers. Staff should aim to identify and correct unkind behaviour before it develops into bullying behaviour. In correcting unkind behaviour, Staff should consider the likelihood that the young person who is perpetrating the abuse may also be at risk of harm and in need of safeguarding.

In the case of abuse by a participant, or group of participants, the key issues identifying the problem as abuse are:

- the frequency, nature and severity of the incidents.
- Whether the victim was coerced by physical force, fear, or by a participant or group of participants significantly older than him or having power or authority over him.
- Whether the incident involved a potentially criminal act, and if the same incident (or injury) had occurred to a member of staff or other adult, whether it would have been regarded as assault or otherwise actionable.

Where an allegation of abuse against one or more participants has been made or where you are concerned about peer-on-peer abuse, the child protection procedures set out in this policy should be followed and the DSL informed. The participant(s) accused of abuse and the victim of abuse will both be treated as at risk and a referral will be made to children's social care in respect of either pupil if that participant is suffering or is at risk of harm.

Sexting

Sexting is defined as the production and/or sharing of sexual photos and videos of and by people who are under the age of 18. It includes nude and nearly nude and/or sexual acts.

Radicalisation and Prevent

We recognise the positive contribution SWMS can make towards protecting young people from radicalisation to violent extremism. SWMS will empower children and young people to create communities that are inclusive and resilient to extremism and promote the development of spaces for free debate where shared values can be reinforced.

As part of the Counter Terrorism and Security Act 2015, schools and out of school settings have a duty to 'prevent people being drawn into terrorism'. This has become known as the Prevent Duty. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

Although a few possible behavioural indicators are listed below, adults should use their professional judgement and discuss with the Designated Safeguarding Lead if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature or iconography, including online material, emails, and text messages
- Behavioural changes
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The DSL is expected to refer cases to the **Channel programme** where there is a radicalisation concern as required and support staff who make referrals to the Channel programme (as outlined in the '**Keeping Children Safe In Education**', **Managing Referrals guidance**, September 2023).

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. 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 and/or 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.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female genital mutilation (FGM)

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Responding to Safeguarding Concerns

If you are concerned about a young person or are worried about a young person's behaviour/safety, yet they have not specifically disclosed any abuse, this should be discussed privately with the Designated Safeguarding Lead and/or the General Manager.

What to do if a disclosure is made to you

If a young person discloses to you information that gives you cause to be concerned for their well-being you should follow the guidance below:

1) Ready?

Someone may want to talk to you at any point. If this involves safeguarding, you must be prepared to listen immediately.

2) Receive

The child has chosen you. You are in a position of trust. Listen carefully to what they say. Do not show shock or disbelief. Take it seriously.

3) Reassure

- Tell the child that they have done the right thing in talking
- Do not make promises you cannot keep (e.g. 'it will be alright now')
- Do not promise confidentiality – you have a duty to refer
- Reassure the child that information will only be shared with those who need to know
- Alleviate guilt – the child is not to blame

4) Respond

- Listen to the child to establish whether you need to refer the matter, but do not interrogate them
- Ask open questions e.g. 'is there anything else you want to tell me?'
- Do not ask leading questions i.e. 'did he/she do X to you?'
- Do not criticise the alleged perpetrator
- Do not ask the child to repeat the matter to another member of staff
- Explain that you will need to talk to the DSL

5) Record

- Make brief notes at the time if you can, and write these up as soon as you can
- Keep your original notes
- Record the date, time, place, and the actual words used by the child (if you can)
- Record statements and actions rather than your own interpretations

6) Report

Immediately contact the DSL or, if unavailable, another Designated Person. The DSL may have to make your record available to Children's Services

What to do if you are concerned about a child/adult at risk or a colleague:

**Is the person in immediate danger?
For all emergencies dial: 999**



What to do if you are concerned about a child/adult at risk or a colleague:

- You receive a direct report of current or historical abuse/harm/potential risks/concerns of radicalisation, etc:
- You observe/hear something, but you are not sure it is a safeguarding issue;
- You receive third party information indicating potential safeguarding risk/harm

- Report immediately to the **SWMS DSL** on the same day the concern was raised: **07515 902847**
- You can also ask advice or report concerns to the **SWMS General Manager** who will contact the **DSL: 07970 553794**

- The **DSL** will consider immediate safety, and further actions required, gather initial information and offer support and guidance
- All concerns will be recorded and the **General Manager** kept informed
- If an allegation is made against a member of staff, the General Manager will be contacted immediately to liaise directly with the appropriate **Local Authority Designated Officer (LADO)**

- The DSL will discuss concerns with **parents/carers** of the child and explain next steps (if this does not put the child at further risk or affect a police investigation)
- The DSL will contact the relevant **Local Authority Safeguarding Unit**
- The DSL will report potential criminal activity to the **Police**

Allegations involving SWMS staff

If you have reason to suspect that a trustee, employee, or freelance worker may have abused a young person at SWMS or elsewhere, you must inform the DSL or General Manager immediately. You should make a record of the concerns, including a note of anyone else who witnessed/has information about the incident or alleged incident.

If the concerns are about the DSL or General Manager, or if you feel the policies are not being observed or enforced, you should contact the Chair of the Board of Trustees.

The DSL will not investigate but will assess whether it is necessary to refer to the Local Children's Services. The DSL will discuss the situation with the General Manager and/or the Chair of Trustees as appropriate.

If a referral is not necessary, the DSL will consider if there needs to be an internal investigation and follow guidelines as laid out in our **low-level concerns policy statements in the following section of this document**. The DSL will discuss the situation with the General Manager and/or the Chair of Trustees.

If a referral is made, the member of staff against whom the allegation has been made should not be informed of the allegation until action is agreed with the Local Children's Services and the Local Authority Designated Officer (LADO). Action may include suspension until the matter has been investigated and internal disciplinary action may be taken following the conclusion of the investigation.

If after the initial discussion with the LADO it is agreed that the allegation meets the criteria a multi-agency meeting will be convened, and the senior person will be invited. This might result in a criminal investigation, a Social Care investigation and or an investigation to inform whether disciplinary action is required.

If at the meeting it is agreed that the allegation does not meet the criteria the LADO will record the initial discussions and send it to the management team for record.

Further action

Further meetings might be required, and these will be always convened by the LADO with SWMS input.

The DSL will refer cases to the Disclosure and Barring Service as required, where a person is dismissed or have left due to risk/harm to a child (as outlined in the 'Keeping Children Safe in Education' document, September 2024)

All freelance workers are required to sign a contract, which includes their commitment to abiding by the SWMS Safeguarding Young People Policy.

Record keeping and retention

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This record should include the date, time and place of the conversation and detail of what was said and by whom and who was present.

The record should be signed by the person writing it.

Further information on the allegation's management process can be found in the government document: 'Working together to safeguard children in Education', updated 2024.

Low Level Concerns

This Policy ensures South West Music School's compliance with Part 4, para 430 of Keeping Children Safe in Education (2024) which states that:

430. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

This applies to all concerns (including allegations) about members of staff that do not meet the harm threshold. For the purpose of this document, 'members of staff' includes employed and contracted members of the SWMS team, mentors, music tutors, pastoral team members, and adult volunteers.

Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns with the DSL/Headteacher/Chair of Governors/Local Authority Designated Officers
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Reporting a low level concern

- Low level concerns about a member of staff should be reported to the DSL/General Manager
- If the concern is about the General Manager this should be reported to the Chair of Trustees.
- Low level concerns about volunteers, contracted staff and other visiting adults will also be reported to the DSL/General Manager.

Staff should use the South West School's Low-Level Concerns Reporting Form (appendix two.)

Responding to low-level concerns

The General Manager will be the ultimate decision-maker in respect of all low-level concerns, although it is recognised that depending on the nature of the concern, the General Manager may wish to consult with the Designated Safeguarding Lead (DSL) and take a more collaborative decision-making approach. If concerns relate to the General Manager and/or the Designated Safeguarding Lead, then the Chair of Trustees should decide on whether the concern is a low-level concern or not.

If the concern is raised via a third party, the General Manager/Chair of Trustees will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

The General Manager/Chair of Trustees will use the information collected to categorise the type of behaviour and determine any further action, in line with South West Music School's Code of Conduct. The person responsible will also ensure:

- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low level concerns that South West Music School feel may need further guidance on will be referred to the LADO for advice
- Low level concerns that South West Music School feel they can deal with internally will be dealt with via the behaviour policy/code of conduct.
- South West Music School will engage with the Chair of Trustees/LADO where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

All low-level concerns will be recorded in writing (see appendix 2). In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the General Manager/Chair of Trustees will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual is no longer working with South West Music School

Reviewing a low-level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the General Manager/Chair of Trustees will decide on a course of action, which may include;

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates to volunteers, or any other concerns arise, South West Music School can contact the LADO for further advice.

Social Media Code of Conduct, Photo and filming permission/storage

(For more detailed information, please refer to our [Social Media Policy](#))

All SWMS parents, guardians and students are requested to fill in a photo and filming permission form on acceptance of the student offer.

The photographs or video recordings will only be used for the purposes set out in the consent form.

Young people must never be fully named in images of any kind without prior parental permission.

Freelance staff and partner organisations are not permitted to take any photographic or film footage within our activities without prior consent of the DSL or General Manager.

Parents/Carers, Freelance staff and partner organisations are requested to not share images or film on social media, other than that of their own child.

Mobile phones

We ask that no mobile phones are accessed during workshop delivery. A tutor may occasionally request that students record themselves as part of the activity in a managed environment.

The General Manager and DSL may take activity images according to our parental consent forms during workshops.

During residential activities SWMS acknowledges that mobiles are helpful to keep in contact with parent/guardians/carers. However, we request that access is limited to private time.

All students are requested to respect our code of conduct related to mobile phone and social media when on residential activities and workshops as outlined for each activity.

Storage of personal/confidential information associated with the grant application process for the DfE – The process of grant applications requires financial disclosure and personal information. SWMS adheres to the GDPR guidelines and is signed up to the code of standards of the ICO (Information Commissioner's Office) The DfE operates a secure portal.

Safeguarding at SWMS Activities

Supervision and Staffing at SWMS activities

We follow NSPCC Supervision guidance ensuring that appropriate adults are engaged to a ratio of 1:10 (one adult to every ten young people). All adults involved in SWMS activities have a safeguarding responsibility and therefore suitable supervisory adults include SWMS employees, contracted freelance tutors and pastoral staff. All SWMS group activities will have a minimum of two adults supervising the project.

The SWMS Pastoral House Parent team is a dedicated team of freelance house parents whose role is solely to supervise and support young people. The number of House Parents engaged for activities will be determined by the logistical needs, ensuring a minimum of 1:10 ratio is always observed.

Every SWMS residential course will include at least one adult who is Level 3 Safeguarding Trained and one adult who is First Aid Trained with a valid 'First Aid At Work' qualification.

For every SWMS workshop and residential course, an adult will hold an emergency mobile phone which will be accessible throughout the course. The number will be shared with young people, parents/carers and other staff members ahead of the start of the course.

Arriving and Departing from projects

Most students are delivered and collected from projects by their parent/carer. For those students arriving by train, prior arrangements are put in place to ensure there is a member of the SWMS chaperone team to collect from the destination station and oversee their transport to the activity venue.

On arrival at the venue, all students are signed into the course, collecting up-to-date medical information and any parent/carer updated contact information.

Once a young person has signed into the SWMS activity, they will be required to remain within the boundaries of the venue unless given express permission by a SWMS team member to leave for a short time.

Accommodation & Toilets

Young people who identify as non-binary, transgender, gender fluid or any other identity will be treated with full and equal respect and support with their safety and comfort central to all decisions.

Accommodation and toilets will be arranged based on male and female genders. In each case of people who identify as non-binary, transgender, gender fluid or other identity, a bespoke plan will be created where appropriate, which could entail private facilities.

In a residential environment, adults should not invite a young person into their bedroom area. If a need arises to enter a young person's room, it should be with their permission and where possible with the direction of the Safeguarding Lead. Staff should never enter alone, always in pairs.

Young people will not be required to share changing facilities with adults at any times. Wherever possible, bathrooms and toilets will be separated between young people and adults. In instances where this is not possible, appropriate measures will be put in place.

Young people attending residential courses will be given a clear curfew. They will be expected to remain in their own bedrooms overnight until the wake-up call by a member of the pastoral team.

Any young person who becomes unwell, needing help or support overnight will be able to phone or text the Lead House Parent, who will be able to assist as appropriate.

One-to-One meetings

SWMS mentoring and some tutoring sessions are held 1-2-1 with the young person and their allocated professional mentor. The following steps are in place to ensure these individual sessions are managed as safely as possible:

- All sessions are pre-arranged, with parents/carers fully informed of the venue, date and time
- Where sessions are held online, mentors are to refer to the Online Safeguarding Policy
- Where sessions are held in the young person's home, it is expected that a parent/carer will be on site within the building and within earshot
- Where parents are unable to oversee sessions within the home, they should be held in an alternative public or semi-public area such as in a local coffee shop, or during a SWMS workshop or residential course
- All mentors and tutors hold an enhanced DBS certificate linked to the Government's Update Service. Certificates are checked annually
- All mentors and tutors are formally contracted, with a requirement to have read and abide by our Safeguarding Young People Policy document
- All mentors and tutors are required to have completed safeguarding training to a minimum CPD accredited Level 1, updated every 2 years

SWMS Auditions

SWMS Audition sessions follow the same safeguarding procedures as all other SWMS activities. Within the auditions themselves, other than for exceptional cases, all auditions will be conducted with no fewer than two members of staff in the audition room with the young person. The informal Q&A session will be carried out with a member of the SWMS team with level 3 safeguarding training and an enhanced DBS certificate.

Medical Care

During all residential activities, SWMS will have a qualified first aider (with a current 'First Aid at Work' level certificate) on site throughout the course. For one-day workshops where there is no SWMS qualified first aider in attendance, the venue will have an on-site qualified first-aider available for emergencies. The SWMS team member with pastoral responsibilities for the group will have access to the venue's first aid contact number and will be responsible for contacting them immediately if required.

All young people complete a medical form at the start of each academic year. Ahead of every residential course, parents are reminded to update their child's details if necessary. The medical form also outlines all allergies and dietary requirements which are checked ahead of the courses.

Where a young person has identified a serious allergy requiring epi-pen treatment, the House Parents will check if the student has brought their epi-pens with them at the start of the course.

When a child arrives with their own medication from home, this will be handed into the Lead House Parent at the start of the residential course, provided in a labelled container with clear instructions for administration of the medication.

Medical Emergencies

If a medical emergency occurs, an appropriate adult should ring 999 followed by contacting the General Manager. The First Aider will, as a general rule, accompany the young person to hospital with the ambulance crew. A member of the pastoral team will also attend where appropriate.

Communication with Parents/Carers

The Pastoral Team Leader or General Manager will be responsible for talking with the parents/carers and ensuring that they are aware of their child's medical condition throughout.

Appendix 1: Additional Resources

We comply with the guidance and procedures set out by the following legislations and guidance:

Department for Education's statutory guidance, **'Keeping Children Safe in Education'** (updated September 2024)

Department of Education's statutory guidance, **'Working together to safeguard children'** (updated February 2024)

Department for Education's Statutory Framework, **'Working Together to Safeguard Children Statutory Framework'** (updated February 2024)

Department for Education's 'After-school clubs, community activities and tuition: Safeguarding Guidance for Providers' (September 2023)

Department for Education's 'What to do if you're worried a child is being abused: advice for practitioners' (March 2015)

The Charity Commission's Strategy for Dealing with Safeguarding Issues in Charities (May 2013, updated December 2017)

The Department for Education's Guidance document, 'Safeguarding and protection people for charities and trustees' (November 2021, updated June 2022)

The Department for Education's guidance document, 'Managing risk of radicalisation in your education setting' (Updated September 2023)

The Charities Act 2011, which covers the meaning of a charity and the legal duties and responsibilities of charity trustees

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Department for Education's advice on Child performance and activities: licensing

Children and Young Persons Act 1963

Children (Performances and Activities) (England) Regulations 2014

Department of Educations' 'After-school clubs, community activities and tuition: safeguarding guidance for providers, September 2023)

Appendix Two: Low-Level Concern Form

South West Music School
Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with *setting name* staff code of conduct, including inappropriate conduct outside of work, **and**
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed, and dated and returned to the General Manager

Name of staff member:

Role (e.g. workshop tutor):

Details of Concern:

Date:

Signed:

Name:

General Manager to Complete.

Details of steps that have been taken to investigate this concern:

For low-level concerns that involve the behaviour/conduct of an adult working in or on behalf of SWMS, please also complete the following sections:

Set out below the individual's response to the concern:
Is this concern 'low level' or should it be treated as an allegation against staff? <i>To reach this decision, consider the information set out above. If you are unsure, seek advice from LADO and inform the Chair of Trustees. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO.</i>
Have 'low level' or other concerns been raised about this individual previously? <i>If so, please provide dates, brief details, and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold of harm.</i>
Details of further action required <i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i>
Completed by: <i>Low level concerns involving the conduct/behaviour of a member of staff must be dealt with by the General Manager or the Governor of Trustees if the LLC is regarding the General Manager:</i>
Name: Position: Date: Signature: