

# Safeguarding Policy

Version number	Date approved (including committee)	Reason for production/revision	Author	Proposed next review date
V8	10/08/21 Executive Committee	Annual review	Head of Student Services	Biennial and as required

## Related policies

- Safeguarding Procedure
- Staff Code of Conduct
- Student Charter
- Student Anti-Bullying Policy and Procedure
- Student Mental Health Policy and Procedure
- Support to Study Policy and Procedure
- Disability Policy and Procedure
- Admissions Policy and Procedure
- U18 Policy and Procedure

## External Reference

1. Equality Act 2010, <https://www.legislation.gov.uk/ukpga/2010/15/contents>
2. Prevent Duty (2015) Compliance
3. Counter-Terrorism and Security Act 2015
4. Sexual Offences Act 2003
5. Office for Students Prevent Monitoring Framework, <https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/how-we-monitor/>
6. The Children Act 1989 provides the legislative framework for child protection in the UK
7. The Children Act 2004
8. Children and Social Work Act 2017
9. Safeguarding Vulnerable Groups Act 2006
10. The Care Act 2014, legislation regarding safeguarding vulnerable adults. The Act sets out a legal framework for how local authorities and other organisations should react to suspicion of abuse or neglect.
11. Working together to safeguard children (Department for Education, 2018), last updated in December 2020, contains the key statutory guidance for anyone working with children in England. It sets out how organisations and individuals should work together and how practitioners should conduct the assessment of children.
12. The Modern Slavery Act 2015.
13. 'Safeguarding: A guide to Governors' – AdvanceHE – 2018.

## **1. Policy Statement**

- 1.1. The Institute of Contemporary Music Performance (ICMP) has a statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of children, young people and Adults at Risk receiving education and training.
- 1.2. Throughout this policy reference is made to “children and young people”. This term is used to mean those under the age of 18. ICMP recognise that some adults are also vulnerable, accordingly, the procedures maybe applied (with appropriate adaptations) to allegations of abuse and the protection of Adults at Risk.
- 1.3. The minimum age for students to study at ICMP is 16.
- 1.4. Children or young people engaged in outreach activity, school visits or attending an Experience Day unaccompanied, must be over the age of 16. Children under the age of 16 must be accompanied by a parent, responsible adult or representative from their current school. It is the responsibility of the visiting school to ensure that any adult accompanying the children / young people has undergone appropriate checks and is approved for such activity.

## **2. Definition**

- 2.1. ‘Children and young people’ - This term is used to mean “those under the age of 18”.
- 2.2. ‘Adult at Risk/vulnerable adults’ – is defined as an individual aged 18 years or over; who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to care of themselves, or unable to protect themselves against significant harm or exploitation<sup>1</sup>.

## **3. Purpose**

- 3.1. The Institute of Contemporary Music Performance is committed to carrying out its duty to protect and safeguard young people and vulnerable adults who may have suffered abuse, who may be at risk of abuse or who may wish to disclose allegations of abuse whether that alleged abuse concerns employees of the ICMP, other students or any other person unconnected with the ICMP.
- 3.2. The ICMP is committed to fulfil its duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people being drawn into terrorism (the Prevent Duty).
- 3.3. The ICMP, as an employer, also recognises that it has duties and responsibilities relating to the protection and fair treatment of its staff. Should allegations of abuse and or inappropriate behaviour be levelled against an employee, the ICMP will afford that employee the necessary support as is appropriate in the circumstance arising.
- 3.4. The ICMP also recognises that it has duties and responsibilities relating to the protection and fair treatment of its students. Should allegations of abuse and or inappropriate behaviour be levelled against a student, the ICMP will afford that student the necessary support as is appropriate in the circumstance arising.

## **4. Scope**

- 4.1. The Policy addresses all aspect of child protection and safeguarding within the work of ICMP.
- 4.2. The policy applies to all ICMP activities, undertaken at any campus or online including but not limited to outreach programmes, teaching activities, student work placements and work experience.
- 4.3. The policy applies to all staff and students of ICMP, including those that do not have a specific role in relation to safeguarding matters, and visitors or contractors engaged by ICMP who may come into contact with a child or vulnerable adult as part of their work or activities.

---

<sup>1</sup> The Care Act 2014

- 4.4. Staff, students and volunteers of the ICMP who encounter children, young people or vulnerable adults in another organisation whilst representing the ICMP must familiarise themselves with the host organisation's safeguarding procedures. The host organisation's procedures should be used if there are concerns about a child, young person or vulnerable adult.
- 4.5. Guidance in relation to the admission of students who are under the age of 18 is contained within the Admissions and U18 policies.

## 5. Principles

- 5.1. The ICMP has designated senior members of staff with the responsibility for all safeguarding issues relating to young people and vulnerable adults.
- 5.2. The Corporate Board have agreed to prevent compliance and governance oversight of the implementation of the ICMP's Prevent duty obligations. The Board receive a quarterly Prevent duty compliance report.
- 5.3. The Business Development Director is the Corporate Board representative for Safeguarding.
- 5.4. The Executive Committee receive a quarterly Safeguarding report, which details all issues / incidents relating to safeguarding / child protection.
- 5.5. The ICMP is committed to ensuring that it:
  - Provides a safe environment for young people and adults at risk to learn in
  - Identifies young people and adults at risk who are suffering, or likely to suffer, significant harm, and
  - Takes appropriate action to see that such young people and adults at risk are kept safe, both at home and within the ICMP.
- 5.6. In pursuit of these aims, the ICMP will approve and regularly review policies and procedures with the aim of:
  - Raising awareness of issues relating to the welfare of young people and adults at risk and the promotion of a safe environment for the young people and adults at risk learning within the school;
  - Aiding the identification of young people and adults at risk of significant harm, and providing procedures for reporting concerns;
  - Establishing procedures for reporting and dealing with allegations against members of staff;
  - The safe recruitment of staff.
- 5.7. In developing the policies and procedures, the ICMP will consult with, and take account of, guidance issued by the Department for Education (DfE), the Local Safeguarding Children's Board (Brent LSCB), Brent Safeguarding Adults Board, (BSAB), Office for Students (OfS), and other relevant bodies and groups.
- 5.8. The ICMP will refer concerns that a young person or adult might be at risk of significant harm to the appropriate agencies; LSCB, BASB, the police and / or in cases of radicalisation to the Local and/or Regional Prevent Co-ordinator as appropriate.
- 5.9. All staff working at ICMP will receive relevant safeguarding and prevent training with refresher training as specified in the staff training plan for safeguarding.

## 6. Roles and Responsibilities

- 6.1. Effective safeguarding requires key role holders to understand their responsibilities and to ensure these are carried out.
- 6.2. The **Designated Safeguarding Lead (DSL)** is responsible for:
  - Ensuring compliance in this area;
  - Oversight and management of safeguarding policies;
  - Implementing and promoting this Policy
  - Ensuring that the policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and vulnerable adults;

- Acting as the main point of contact within ICMP for the protection of children and adults at risk;
- Raising awareness of issues relating to the welfare of children and vulnerable adults, and the promotion of a safe environment for the children, young people and vulnerable adults at ICMP;
- Overseeing the referral of cases of suspected abuse, extremism, radicalisation or allegations to the local safeguarding children board, adult social services, Prevent co-ordinators or other relevant investigating agencies as appropriate;
- Liaising with the Local Authority Safeguarding Officer and Adult Social Services and other appropriate external agencies where required;
- Maintaining confidential records of reported child abuse and action taken. All personal data will be processed by the ICMP in accordance with the requirements of GDPR;
- Ensuring that appropriate ICMP staff are provided with information, advice and training about safeguarding.

6.3. The **Deputy Safeguarding Lead and Deputy Prevent Lead** and will deputise for the Designated Safeguarding Lead

6.4. The **Safeguarding Team** care responsible for:

- Providing support, advice and guidance to staff and students about this Policy;
- Referring cases of suspected abuse or allegations to the DSL;
- Ensuring detailed and accurate written records of referrals/concerns are kept and that they are secure and confidential;
- Assisting in the review of safeguarding policies and procedures.

6.5. The **Admissions Manager** is responsible for:

- Informing the Designated Safeguarding Lead on the admission of students who are aged under 18 onto any programme of study at ICMP.
- Informing the Head of Undergraduate Programmes on the admission of students who are aged under 18.

6.6. The **Head of Student Services** is responsible for:

- Advising on the admission and support of students who are aged under 18.
- Monitoring the welfare of students who are aged under 18.

6.7. The **Academic Team** are responsible for:

- Informing the Head of Student Services of any students who, as part of their programme of study, go on placements or conduct research which involves working with children, young people or vulnerable adults.
- Advising on the screening of students who, as part of their programme of study, go on placements or to conduct research which involves working with children, young people or vulnerable adults.

6.8. The **Head of Human Resources** is responsible for:

- Advising on the employment of staff who are aged under 18, including those on work experience schemes;
- Monitoring the welfare of staff who are aged under 18 (in conjunction with the relevant Line Manager).
- Providing guidance on whether individuals who are employed in any capacity by the ICMP should be subject to a DBS check.
- Undertaking an annual audit of all DBS checks and providing a quarterly DBS compliance report.

- Ensuring that the recruitment and selection of staff or students for positions or activities which may entail contact with children, young people or vulnerable adults comply with ICMP's Recruitment Policy and Safer Recruitment.

6.9. The **Student Acquisition and Student Events Manager** is responsible for:

- Undertaking risk assessments for activities with groups of young people on campus.
- Ensuring all staff and volunteers helping at school outreach activities, experience days, etc. have completed relevant training, have read and understood the Safeguarding Code of Conduct (Appendix A) and understand the referral procedure for children and young people. (MyICMP/ Summer Schools).

6.10. The **Summer School Coordinator** is responsible for:

- Informing the Head of Student Services of all staff engaged in the provision of Summer School activity;
- Reporting any concerns about safeguarding individuals to the Head of Student Services / Designated Safeguarding Lead.

6.11. **All staff** are responsible for:

- Reporting any concerns about safeguarding individuals to the Head of Student Services / Designated Safeguarding Lead.

6.12. **All staff and/or students** who intend to, or may be put in the position of working with children, young people or vulnerable adults are responsible for:

- Ensuring that they understand the implications of this Policy before commencing any programme, event, visit or other activity.

## 7. Organising Activities for Children and Young People

- 7.1. The ICMP strives to produce a safe and secure environment. However, buildings and their safety precautions are designed with an adult population in mind and may not be enough on their own to keep children/ vulnerable adults safe. Although ICMP does not act in *loco parentis* it does have a greater duty of care in these circumstances.
- 7.2. A risk assessment must be completed before any new or changed programme, event, visit or any other activity involving children, young people or vulnerable adults both onsite and online.
- 7.3. The risk assessment process should encompass all aspects of health and safety e.g. fire, security etc. It should also consider practical arrangements e.g. transport and safe collection of children and young people.
- 7.4. Risk assessments must be carried out on all visiting faculty, guest lecturers and professional practitioners, in accordance with the External Speakers & Events Policy and should consider reasonable and proportionate adaptations to their activities where children/ vulnerable adults are / may be present.
- 7.5. If the activity is in conjunction with or organised by another organisation there must be a written agreement as to whose responsibility it is to undertake the risk assessment. The ICMP must have a copy of the other organisation's risk assessment.
- 7.6. Photographs may be taken of children and young people involved in outreach activities on campus. It is essential that children, young people and their parents or carers give permission for their photographs to be used.

## 8. Work Experience, Apprenticeships and Employment

- 8.1. Young people employed by the ICMP and children and young people on work experience at the ICMP must have an individual risk assessment which details any

risks associated with the role and controls which have been put in place to mitigate these risks.

- 8.2. It is the responsibility of the Head of Department to ensure that a risk assessment is completed before offering work experience and apprenticeships or before employing an under 18.
- 8.3. Staff working with a child or young person should familiarise themselves with the Safeguarding Code of Conduct in Appendix A

## **9. Undergraduate Programmes which have Students under 18.**

- 9.1. It is the responsibility of the Dean of Academic Studies to ensure that modules or programmes which may present a risk to young people are clearly identified as part of the module and programme approval process.
- 9.2. It is the responsibility of the Head of Undergraduate Programmes / Head of Student Services to ensure that an individual risk assessment is completed for any student who is under 18.
- 9.3. Staff working with a child or young person should familiarise themselves with the Safeguarding Code of Conduct in Appendix A

## **10. Staff Training**

- 10.1. ICMP request all staff to complete three compulsory training modules as part of the Induction process, Educare 'Safeguarding Young People for Colleges and Universities', Home Office 'Prevent' E-Learning module and Educare 'Equality & Diversity'. Refresher training is required every three years.
- 10.2. The Designated Safeguarding Lead (DSL) and Safeguarding Team have undertaken appropriate safeguarding / child protection training. The DSL and Deputy Prevent Lead have also completed the Train the Trainer WRAP (Workshop to Raise Awareness of Prevent). Refresher training is required every two years.
- 10.3. ICMP provide appropriate guidance and training on this Policy as part of the Induction process.

## **11. Monitoring Effectiveness**

- 11.1. Where an allegation has been made against a member of staff, the Executive Committee should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the school's procedures and/or policies and/or which should be drawn to the attention of the Brent LADO. Consideration should also be given to the training needs of staff.



The Institute  
of Contemporary  
Music Performance

## Appendix A:

### Safeguarding Code of Conduct

The following code of conduct sets out good practice in relation to dealing with children, young people and vulnerable adults:

- Treat all children, young people and vulnerable adults equally and with dignity and respect at all times.
- Try to work in an open environment and avoid being alone with a child, young person or vulnerable adult. Where a one-to-one meeting is required it should be conducted in an office with an open door or with visual access.
- Maintain a safe and appropriate distance, avoiding physical contact which, however well-intentioned, may be misinterpreted.
- Do not divulge home telephone numbers/personal mobile phone numbers, addresses or personal social media and email accounts to young people and vulnerable adults, ensure that there is no physical contact with them, avoid inappropriate familiarity or discuss matters of a sexual nature.
- Never promise that a conversation will be kept wholly confidential.
- Keep a record of any incident or injury sustained by a child or vulnerable adult. Where an accident has occurred, ensure that accident reporting procedures have been followed.
- Never allow allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon.
- Avoid taking responsibility for tasks for which training is required but has not been provided or which a child, young person or vulnerable adult can do for themselves.
- Ensure co-operation with all ICMP regulations and HR policies and procedures.
- Where recruitment and selection of staff or students for positions or activities which may entail contact with children, young people or vulnerable adults is taking place, comply with the ICMP's Recruitment Policy and the ICMP's Admissions and U18 policies.