

# SEM

Safeguarding Policy: Safeguarding Children, Young People and  
Vulnerable Adults

Effective September 2019  
Next Review Date August 2020

SEM

### **What is Safeguarding?**

Protecting children, young people (under 18) and vulnerable adults from abuse or neglect. In the context of SEM, this usually means providing a safe environment for them to study, visit and participate in activities; we also have a responsibility to act where we become aware that a child, young person or vulnerable adult is at risk outside of the School.

### **Who is responsible for Safeguarding?**

Everyone has a responsibility to report a Safeguarding concern. This includes staff, students, visitors, volunteers, contractors etc. and to any activity organised and/or delivered by SEM representatives, regardless of where it takes place. External groups and organisations running activities on our premises are required to do so in accordance with approved risk assessments and safeguarding policies.

### **What is a vulnerable adult/adult at risk?**

'A person aged 18 or over who is or 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 take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' No Secrets (DH 2012).

### **When should I report a Safeguarding concern?**

Immediately, so that the appropriate action can be taken to protect the individual and to support you.

### **How do I report a Safeguarding concern?**

If you feel that a child, young person or a vulnerable adult is at risk of abuse or neglect, you should immediately contact the Head of Student Services on 0161 833 4722.

### **What happens once I report my concern?**

The Head of Student Services will talk to you about your concerns and assess what action to take. As this can sometimes be a difficult process, support will be available to you for as long as required afterwards.

### **In the event of any uncertainty about the scope of this policy or who to contact in the first instance, the Head of Administration and Student Welfare will be happy to help with any advice or support needed:**

Lawrence Allen  
School of Electronic Music  
Bexley Chambers  
Manchester  
M3 6DB  
Tel: 0161 833 4722  
E-mail: [lawrence@semmanchester.com](mailto:lawrence@semmanchester.com)

### **Purpose of the policy**

The protection and welfare of children, young people and vulnerable adults is an important element of our values.

The purpose of this policy is to:

- Protect children, young people and vulnerable adults associated with SEM
- Provide staff, students, visitors, contractors etc. with the overarching principles that guide our approach to safeguarding and ensure appropriate support and advice is available to them.

All staff, students, contractors or representatives of SEM are expected to comply with this policy and promote the welfare of children, young people and vulnerable adults. Line managers are responsible for monitoring that relevant staff members are made aware of and follow the policy, as appropriate to individual job roles. If there is a concern that the policy is not being followed correctly, advice should be sought from the Head of Student Welfare.

We recognise that:

- The welfare of children, young people and vulnerable adults is paramount, as enshrined in the Children Act 1989.
- All children, young people and vulnerable adults using our facilities or engaged in SEM facilitated activities should be protected from harm, regardless of age, disability, gender, race, religious belief, sexual orientation or identity and have a right to equal protection from all types of harm or abuse.

We will seek to keep children, young people and vulnerable adults safe by:

- Valuing them, listening to and respecting them.
- Providing effective management by adopting child protection practices through our policies and procedures and providing support and training for our staff
- Sharing information about child protection and good practice with children, parents, staff and students as appropriate.
- Sharing concerns with agencies who need to know, and involving parents and children, young people and vulnerable adults appropriately.

We will take all reasonable measures to:

- Ensure that all have the opportunity to participate in SEM activities in a safe and secure environment.
- Identify and prevent anyone who is unsuitable to work with children, young people and vulnerable adults from doing so.
- Ensure that any child, young person or vulnerable adult who is at risk of, or experiencing significant harm is identified and responded to appropriately and without delay; developing and implementing appropriate procedures for responding to accidents, incidents, alleged or suspected harm.
- Ensure that all concerns are taken seriously, responded to appropriately and without delay.

### **Legal Framework**

SEM's approach to safeguarding is based on the principles recognised within UK and international legislation and government guidance.

### **Roles and responsibilities**

The Head of Student Services: The School's Principal Safeguarding Lead.

This role oversees the framework and acts as the lead for safeguarding and protecting children and vulnerable adults. The Head of Student Welfare maintains key safeguarding records centrally and securely.

Please also see below for staff, volunteer and subcontractor guidance on responsibilities.

### **Training and support**

Those with designated roles and responsibilities, as detailed above, will be provided with specialist safeguarding training and continuing support to ensure that they are competent and confident to undertake these important roles. Specialist support will also be available to them (and any member of staff involved in a safeguarding case).

### **Recruitment and selection of staff and engagement of contractors**

SEM has published guidelines to assist recruiters with the safeguarding element of their work:

- Recruitment and selection policy
- Disclosure and Baring Service (DBS)

SEM's Human Resources leads on the current arrangements for DBS checks for those posts, which are eligible for such a check. Whilst the DBS potentially provides additional safeguards, it is important to remember that it is part of a wider framework of safe recruitment and selection practices. In particular, it does not replace the need for on-going vigilance in matters concerning safeguarding. Nor does it remove the need for SEM to maintain robust recruitment procedures including, where necessary, checking identity, qualifications, taking up references

which indicate an individual's suitability to work with children, young or vulnerable people, and enquiring into career history.

All SEM staff who are employed by SEM to work with children, young people and vulnerable adults and whose posts have been risk-assessed and eligible for DBS checks will be subject to those checks and safe recruitment processes. Any person employed to work with children, young people or vulnerable adults on activities is required to complete a self-disclosure whilst awaiting DBS checks.

Contractors who are engaged in regulated activities relating to children and vulnerable adults on behalf of the School are required to conduct relevant DBS checks in accordance with the requirements of the Safeguarding Vulnerable Groups Act (SVGA) and otherwise to comply with the vetting and reporting requirements of the SVGA. All contractors on SEM premises are expected to follow this policy and procedures.

### **Reporting concerns**

Anybody reporting a concern in good faith and in the genuine belief that there are concerns relating to safeguarding will be supported to do so even in the event of that concern subsequently being found to be unsubstantiated.

It is not the responsibility of anyone working for SEM, in a paid or voluntary capacity, to decide whether or not abuse is taking place. However, there is a responsibility to act on concerns in accordance with this policy to protect children, young people and vulnerable adults from harm.

- SEM staff have no investigative role.
- It is not the place of SEM employees or students to make a judgement about whether abuse has occurred - this is the remit of external agencies.

Any incident which causes concern in respect of a child, young person or vulnerable adult should be reported immediately to the HoSS. Below are examples of incidents that are required to be reported:

- There is a concern that a child, young person or vulnerable adult is, or may be subject to abuse, neglect or harm.
- There is an approach by a child young person or vulnerable adult revealing that she/he is being, or has been harmed or groomed
- There is a concern that a relationship is developing which may be an abuse of trust
- There is a concern that a child, young person or vulnerable adult is becoming attracted to a colleague or member of staff
- There has been a need to physically intervene to prevent a child, young person or vulnerable adult from harming themselves or another or from causing significant damage to property
- There has been a report from a child, young person or vulnerable adult who is alleging abuse by a staff member, volunteer or a member of an external organisation using SEM's facilities
- It becomes apparent, or likely that a child, young person or vulnerable adult is being recruited or is recruiting into extremist organisations

### **Responding to an Allegation**

All concerns relating to a child, young person's or vulnerable adult's welfare will be taken seriously and responded to proportionately and appropriately. The impact is potentially distressing for all concerned. It is important that all allegations are handled correctly and proper records are kept. The HoSS will consider all concerns and complete the appropriate documentation. They will provide support and where appropriate telephone the referral into Children's Social Care/ Adult Social Care. They will also ensure that the appropriate referral form for external agencies (CSC/ EDT or ASC) is completed within 24 hours.

### **Dealing with allegations or suspicion of abuse against an employee of SEM at work**

There may be three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence

- Enquiries and assessment by children's or adult social care about whether a child, young person or vulnerable adult is in need of protection or in need of services
- Consideration by SEM as the employer, of action under the disciplinary policy, in respect of the employee against whom the allegation has been made. Note – an investigation would always be undertaken before disciplinary action was taken.

If action is warranted the Principal will be consulted about student issues and staff issues will be referred to HR, who will arrange for the Principal Safeguarding Lead to advise the member of staff as soon as possible after the discussion between the Principal Safeguarding Lead (Operational) and Local Authority Designated Officer (LADO). It should be made clear to the employee that the meeting is not an investigatory meeting or disciplinary hearing.

The possible outcomes from the action may include the following:

- That there should be an immediate referral to child protection agencies to deal with the matter. HoSS will be responsible for liaising with Children's Social Care and other relevant agencies).
- That the allegation is without foundation and does not warrant further investigation.
- If the allegation was prompted by inappropriate behaviour by the employee this may need to be considered under SEM's Disciplinary Procedure.

Where allegations of abuse call for immediate referral to child protection agencies or Local Safeguarding Adults' Boards

- Subsequent action taken will be in accordance with the Local Safeguarding Children's/ Vulnerable Adult's Boards procedures.
- The HoSS will not be part of the investigating team but they will be expected to contribute to discussions on how the investigation will be conducted.
- The HoSS will liaise with the agencies to obtain information on the progress of the investigation and update the Principal.

SEM will conduct an internal investigation. However, any investigation by the police, child or adult protection agencies will usually take priority and any internal processes will be held pending the outcome of these, though in appropriate cases, the School may proceed before an investigation is completed. The circumstances in which an internal SEM investigation should take place will be discussed with the appropriate Local Authority Designated Officers for adults or children. As a general rule, an internal investigation will commence after the child or adult protection agencies have completed their investigation. All records relating to the matter and the investigation will be kept confidential by the School.

### **Procedures for dealing with an allegation of abuse by an individual of an external organisation using SEM facilities**

If a child, young person or vulnerable adult alleges abuse by an employee of an external organisation, a referral must be made to the HoSS. Following the outcome to any related investigation, the HoSS will consider with appropriate senior management whether or not the external organisation should be permitted to continue using SEM's premises and facilities.

### **Legal Context for this Policy**

- Children Act 2004
- Children Act 1989
- Working Together to Safeguard Children (HM Government 2013)
- No Secrets 2012
- Protection of Vulnerable Adults (POVA) guidance 2005- now Adult's List guidance
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Human Rights Act 1998
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974
- UN Convention on the Rights of the Child 1989
- Data Protection Act 1998
- Care Act 2014

- LCC Local Safeguarding Children Board Policy and Procedures
- LCC Safeguarding Adults Board Policy and Procedures

## **Glossary & Definitions**

### **Adult at Risk**

There is currently a move away from the terminology 'vulnerable adult' as it has been recommended that this be changed to 'an adult at risk' as it has been suggested that the term 'vulnerable adult' reflects a medical model of disability. The new terminology is more in keeping with a social model of disability and recognition that a person should not be defined by their vulnerability and that many of the risks posed to individuals are situational as oppose to inherent. Adults are people 18years of age and over.

### **Child**

Throughout this document references are made to 'child/children' and 'young person/people'. These terms are used interchangeably and refer to people under the age of 18 years. 'Children' are defined as any young person under the age of 18 within UK legislation<sup>2</sup> and are therefore recognised as having additional vulnerabilities and requiring of greater protection. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children Act 1989.

### **Child Abuse**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by a stranger. The four types of abuse<sup>3</sup> are:

#### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

#### **Emotional Abuse**

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued insofar as they meet the needs of another person. 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, 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 ill treatment of a child, though it may occur alone.

#### **Sexual abuse**

Sexual abuse involves grooming, forcing or enticing a child; young person or vulnerable adult is to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

## **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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food or clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Child Protection**

Child protection is an important element of safeguarding and promoting welfare which relates to specific children or young people who are who are suffering, or are likely to suffer, significant harm.

Child protection refers to the activity that is undertaken to protect specific children and young people. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

## **Local Safeguarding Children or Vulnerable Adult Boards**

All local authorities must have a Local Safeguarding Children and Vulnerable Adult Board . They are made up of senior managers from the Statutory, Independent and Voluntary sector. They provide the framework, rules and guidelines in a locality for safeguarding children and vulnerable adults. The Boards are the key mechanism for agreeing how the relevant organisations (including SEM) in each local area will co-operate to safeguard and promote the welfare of children and vulnerable adults locally, and for ensuring the effectiveness of what they do.

## **Regulated Activity**

At the core of the Disclosure and Barring Scheme (DBS) is a concept known as regulated activity. The Safeguarding Vulnerable Groups Act 2006 states that a person is engaging in regulated activity if, on a frequent or intensive basis, they are either carrying out a specified type of work with children or vulnerable adults, or any form of work that takes place at a specified place. "Frequent" is defined as once a month or more on an on-going basis and "intensive" as three or more times within a thirty-day period, or overnight (between 2.00am and 6.00am).

Regulated activities can include, but are not limited to, any of the following:

- Unsupervised teaching, training or instruction, or any form of care or supervision of children
- Any form of advice or guidance on physical, emotional or educational well-being provided wholly or mainly for children
- Any form of healthcare treatment provided to children or vulnerable adults.
- Driving a vehicle that is being used for the specific purpose of conveying children or vulnerable adults
- Working in a specified place e.g. schools

## **Safeguarding**

Safeguarding and promoting the welfare of children and young people is defined as:

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

Safeguarding therefore refers to the actions taken to promote the welfare of all children and young people and the measures we put in place to ensure a child-focused environment and workforce and to minimise the risks of harm.

Significant Harm was introduced in the Children Act 1989 as the threshold that justifies compulsory intervention to protect the best interests of children.

### **Guidance: Working with children, young people and vulnerable adults**

Staff, students and volunteers participating in SEM events and activities may be in contact with children, young people or vulnerable adults. To keep everyone safe, please follow the guidance detailed below. This will:

- Provide guidance for everyone about acceptable and unacceptable behaviours with children, young people and vulnerable adults
- Identify staff, volunteers and students working for SEM who need further safeguarding training
- Deter anyone who wished to harm a child, young person or vulnerable adult from seeking employment at SEM

### **Staff Guidance**

SEM wishes to ensure that anyone working for SEM, with children, young people and or vulnerable adults understands how to keep everyone safe. Staff and students will follow this guidance in order to protect themselves, children, young people and vulnerable adults. The following examples will create a positive and safe environment for vulnerable groups as they participate with us in SEM activities.

Staff should:

- Treat everyone with fairness and respect and provide an example that they would wish others to follow
- Work openly avoiding private or unobserved situations and working in isolation. Aim to ensure that they are not the only adult present and are at least within sight or hearing of others.
- Maintain a safe and appropriate distance and be aware that physical contact may be misinterpreted
- Ensure that if any form of manual handling/ physical touching is required, it should be – engaged in an open observable environment, taking into account the person's reasonable expectation of privacy
- Unacceptable behaviour by staff or students should be challenged and all allegations or suspicions of abuse should be reported to the HoSS
- The welfare of the child, young person or vulnerable adult must be the first priority.

### **Staff or volunteers should never:**

- Spend excessive time alone with children, young people or vulnerable adults away from others
- Discuss their personal life
- Give out their personal contact details (personal phone or mobile number, email or home address)
- Become 'friends' on social networking sites
- Leave groups of children or young people unsupervised e.g. summer schools
- Allow a child, young person or vulnerable adult to use inappropriate language without challenging it
- Do things of a personal nature that children, young people or vulnerable adults can do for themselves (If a child has a disability any tasks should be performed only with the knowledge and consent of the parent or guardian and, where possible, the child or young person themselves)
- Allow allegations made by a child, young person or vulnerable adult to be ignored, not recorded or not acted upon
- Engage in rough physical or sexually provocative games
- Make sexually suggestive comments, even in fun
- Allow or engage in any form of inappropriate touching

### **How to deal with a disclosure**

If a child, young person or vulnerable adult says or indicates that he or she is being abused, or information is obtained which gives concern that they are being abused, the person receiving this information should:

- Seek advice from the HoSS without delay- this must always be a same day discussion.
- Ensure the immediate safety of the child, young person or vulnerable adult
- If the child, young person or vulnerable adult needs immediate medical treatment, telephone an ambulance, informing the call centre that that this is a safeguarding issue
- Not promise to keep secrets and remind the child, young person or vulnerable adult of the limits to confidentiality
- React in a calm and considered way so as not to frighten or deter the child, young person or vulnerable adult
- If appropriate, reassure the child, young person or vulnerable adult he/she is not to blame for what has happened and that he/she was right to share this information
- Take what the child, young person or vulnerable adult says seriously, recognising the difficulties inherent in interpreting what is said by a child, young person or vulnerable adult who has speech disability and/or differences in communication or language
- Keep any questions to the minimum required to clarify the concern and ensure a clear and accurate understanding of what has been said. Only use open questions.
- Do not ask leading questions or make suggestions about what may have happened
- Listen without interrupting if the child, young person or vulnerable adult is recounting significant events
- Reassure the child, young person or vulnerable adult and tell them what you will do next

Ideally, where the child, young person or vulnerable adult has made a disclosure, a verbatim record of their account of what occurred in their own words should be recorded and should include details of the nature of the allegation or concern, a description of any injury (you must not remove clothing to inspect any injuries or take photographs), times, dates, places and any other details. Do not worry if you feel you have missed something – refer to the HoSS who will pick up further questions/actions.

The person receiving the disclosure or information should NOT:

- Panic or allow any shock or distaste to show
- Make promises of confidentiality but explain that they will need to pass on this information to those who need to know
- Show disbelief or fail to take the allegations seriously
- Ask questions other than to clarify that they have enough information to act
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Approach the alleged abuser
- Make promises or agree to keep secrets
- Fail to take responsibility for reporting the concern