

## Safeguarding Policy

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

**Is the person in immediate danger?  
Contact Police Public Protection Unit 020 7601 2941 (or in an emergency 999)**

**If you are approached by a child/vulnerable adult, with a disclosure that s/he is being or had been harmed or abused**

**Stay Calm**

Don't promise to keep the information a secret

Don't question the individual except to clarify what they are saying

Record the information on the form and follow the procedure on page 2.

Include as much information as you can include date, time and persons present.

**If you are concerned that a child/vulnerable adult is, or may be subject to abuse or harm**

Make a written dated note of observations and inform the Designated Safeguarding Lead in your area following the procedure on page 2.

**If you are concerned that a student, colleague or visitor is in danger of being radicalised**

If you have concerns that people may be vulnerable to radicalisation and recruitment to a terrorist ideology or cause contact the Head of Safeguarding who will decide on the action to take.

**If you have a concern about the behaviour of a member of staff**

If the behaviour of a member of staff or other person is threatening or potentially threatening the well-being of a child or vulnerable adult, you must report your concerns immediately to the Director of Guildhall Young Artists or in her absence the Head of Safeguarding.

Any allegations concerning a member of staff will be referred to the LADO who will decide on any further action

**Please report any concerns even if you are unsure whether it is a safeguarding issue.**

**If you have a concern and are unable to contact the departmental leads or the Head of Safeguarding, do not hesitate to contact Children's Services, Adult Services or the police and inform the Head of Safeguarding of any referrals.**

**Contact details can be found on page 3**

## HOW TO REPORT A CONCERN ABOUT A CHILD / ADULT AT RISK

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

Report on the same day of disclosure / observation / information received to the Designated Safeguarding Lead of your department / programme.

**Immediate danger/ emergencies:** Agree with the DSL to ring Police / Emergency Services (See next page)

Designated Safeguarding Lead (DSL) to alert the Head of Safeguarding (HoS) **on the same day** of receiving information of a safeguarding nature.

Designated Safeguarding Lead (DSL) to alert the Head of Safeguarding (HoS) **on the same day** of receiving information of a safeguarding nature.

Safeguarding Incident Form (Appendix 2) to be completed by the DSL or staff member and emailed to the HoS **within 24 hours** of the date the concern was identified.

Feedback & support from the HoS to the DSL and staff member to agree next actions or closure of the notification (if safeguarding remit was not met)

## **EMERGENCY NUMBERS**

<b>City Children's Social Care Team</b>	020 7332 3621
<b>City Social Care Adult Services</b>	0207 332 1224
<b>Out of hours Adult Social Care</b>	020 8356 2579
<b>Out of hours Children's Social Care: Hackney Emergency Duty Team</b>	020 8356 2710
<b>Police Public Protection Unit</b>	0207 601 2941 (or in an emergency 999)
<b>City Prevent Team</b>	prevent@cityoflondon.gov.uk 0207 601 2420
<b>Extremism email helpline</b>	counter.extremism@education.gsi.gov.uk

### **Guildhall School Head of Safeguarding:**

**Hetsie van Rooyen**

**Email:** hetsie.vanrooyen@gsmd.ac.uk

**Phone:** 0207 628 2571 ext 3088

### **City of London Local Authority Designated Officer:**

**Name:** Pat Dixon

**Email:** pat.dixon@cityoflondon.gov.uk

**Phone:** 020 7332 1215

**NSPCC HELPLINE: 0808 800 5000**

### **Female Genital Mutilation Helpline**

**Email:** fgmhelp@nspcc.org.uk.

**Phone:** 0800 028 3550

### **Forced Marriage Unit**

**Phone:** 020 7008 0151

**Email:** fmu@fco.gov.uk

## GUILDHALL SCHOOL SAFEGUARDING & PREVENT REPORTING CHART

Guildhall School Board of Governors

Principal: Lynne Williams

Director of Guildhall Young Artists & Safeguarding: Alison Mears

Head of Safeguarding: Hetsie van Rooyen

**Regional Centres:**

**CYM Taunton**

DSL: Rachael Parvin

DDSL: Sarah-Jane Cross

**CYM Saffron-Walden**

DSL: Kate Nott

DDSL: Sophie Stafford

**CYM Norfolk**

DSL: Juliet Rickard

DDSL: David Stowell

**CYM Peterborough**

DSL: Kirsten Goldthorpe

DDSL: Lisa Roberts

**CYM London:**

**DSL:**

Geoff Harniess

**DDSL:** Gill Tarlton

**GYA Islington:**

**DSL:**

Spencer Down

**DDSL:** Christie Haddard

**Junior Guildhall:**

**DSL:**

Nigel Springthorpe

**DSL:** William Bruce

**STP Felsted**

DSL: Rachael Bull

**Creative Learning and Enterprise:**

Sean Gregory

**Creative Learning**

**DSL:** Jenny Mollica

**DSL:** Lauren Monaghan-Pisano

**Short courses:**

**DSL:** Laurie Michel-Hautteau

**DDSL:** Tom Steer

**Senior Guildhall:**

**DSL:**

Katharine Lewis

**DDSL:**

Stacey Balsdon

*DSL = Designated Safeguarding Lead*

*DDSL = Deputy Designated Safeguarding Lead*

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## **Guildhall School Safeguarding Policy 2019**

### **1. The purpose and scope of this policy**

**This policy applies to anyone working on behalf of Guildhall School of Music & Drama including Guildhall School Board of Governors, Senior Managers, the Board of Trustees, paid staff, volunteers, sessional workers, agency staff and students. It also includes contractors, support staff (such as cleaners / caterers / builders), visitors to the school, workshop leaders, freelance artists and Senior School students on work placements.**

Guildhall School works with children and adults as part of its activities.

The purpose of this policy statement is:

- to protect children and adults at risk who take part in our various programmes;
- to provide parents, staff and volunteers with the overarching principles that guide our approach to safeguarding.

### **2. Legal Framework underpinning the Guildhall School Safeguarding Policy**

This policy has been developed based on legislation, policy and guidance that seeks to protect children and adults in England. A summary of the key legislation and guidance:

- Keeping Children Safe in Education (Statutory guidance for schools and colleges) September 2019;
- The Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards;
- Children Act 1989 and 2004,
- Safeguarding Vulnerable Groups Act 2006;
- Working Together to Safeguard Children, July 2018;
- The Care Act, 2014 (Adult Safeguarding)
- Data Protection Act 2018 & the General Data Protection Regulation (May 2018).

### **3. Related Policies and procedures**

**This policy should be read alongside Guildhall School and the City of London's organisational policies and procedures, including:**

- Procedures for responding to concerns about a child or young person's wellbeing
- Dealing with allegations of abuse against a child or young person
- Role of the Designated Safeguarding Lead
- Managing allegations against staff and volunteers
- Safer recruitment policy and procedures
- Adult to child supervision ratios
- Code of conduct for staff and volunteers
- Online safety policy and procedures for responding to concerns about online abuse
- Photography and image sharing guidance
- Child protection records retention and storage policy

- Whistleblowing policy
- Relevant standards and guidance including: CITY OF LONDON CORPORATION Thresholds of Need, London Child Protection Procedures, 5th edition, 2017, City & Hackney Protecting Adults at risk: London multi-agency policy and procedures to safeguard adults from abuse.

#### **4. Our commitment to safeguarding**

Guildhall School strives to ensure the safeguarding of all students through robust safeguarding policies, training to staff, compliance with statutory guidance and stringent quality assurance processes.

##### **4.1 Guildhall School recognises that:**

- all children and adults, regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse;
- some students are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

##### **4.2 Guildhall School will seek to keep children, young people and adults safe by:**

- valuing, listening to and respecting them;
- appointing a Head of Safeguarding and various departmental Designated Safeguarding Leads and two Lead Board Members for Safeguarding;
- developing safeguarding policies and procedures which reflect best practice;
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately;
- creating and maintaining an anti-bullying environment and ensuring we have a procedure to help us deal effectively with any bullying that does arise;
- recruiting staff and volunteers safely, ensuring all necessary pre-appointment checks are made;
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures;
- implementing a Code of Conduct for staff and volunteers;
- using our procedures to manage any allegations against staff and volunteers appropriately;
- ensuring that we have effective complaints and whistleblowing measures in place;
- ensuring that we provide a safe physical environment for our students, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance;
- recording and storing information professionally and securely.

##### **4.3 The admission of students under 18 years of age to the Senior School**

Guildhall Senior School is an adult environment and the School has a specific duty of care towards any student admitted to a degree programme who is under the age of 18 at the time of enrolment. Special arrangements will be put in place in line with the "Policy in relation to the admission and support for students entering the School under the age of 18".

#### **5. How to report a concern about a child / young person / adult at risk**

*Please also refer to the process charts on pages 2-3 of this document and the definitions of abuse page.*

### **5.1 Safeguarding Leads:**

The Director of Guildhall Young Artists and Safeguarding has overall strategic responsibility for Safeguarding and Prevent for the School.

The Director of Guildhall Young Artists and Safeguarding will attend Board of Governors meetings, provide the Annual Safeguarding Report to the Board of Governors, attend the Senior Management Team meetings and be responsible for all Safeguarding Risks in the Institutional Risk Register.

The operational lead for safeguarding at Guildhall School is the Head of Safeguarding (HoS).

This role covers reporting of all safeguarding matters to the Director of Guildhall Young Artists and Safeguarding, developing and ensuring quality assurance processes for safeguarding across the school's programmes, monitoring of safeguarding training to staff, support to Designated Safeguarding Leads and direct interface with students, parents, staff and outside agencies. This role is line managed by the Director of Guildhall Young Artists and Safeguarding.

Each department has an identified Designated Safeguarding Lead (DSL) who will be responsible for safeguarding in their area. Each DSL will brief their departments on relevant safeguarding matters including training requirements. The DSL will report any safeguarding concerns directly to the HoS.

In the absence of the HoS the Director of Guildhall Young Artists and Safeguarding will be the main safeguarding contact. Should both the HoS and Director of GYA and Safeguarding be absent the Head of Junior Music Courses will act as the main safeguarding contact.

### **5.2 Process for reporting a concern:**

Any incidents / disclosures / suspicions of safeguarding concerns should be referred to the DSL who then will alert the Head of Safeguarding **on the day the incident occurs, or the disclosure is made.**

The **Safeguarding Incident Form** (please see Appendix 2) needs to be completed by the DSL and sent to the Head of Safeguarding within **24 hours** of the safeguarding information being received. If there was a direct disclosure to a staff member / professional / volunteer the professional would need to complete the Safeguarding Incident Form instead of the DSL, as they received the information first hand.

Once notified of safeguarding information the Head of Safeguarding will assess risk and ascertain next actions (for instance whether to refer to the relevant Local Authority or other support agencies). The Head of Safeguarding will inform the Director of Guildhall Young Artists and Safeguarding of all safeguarding incidents.

In all cases of allegations against staff and volunteers the Head of Safeguarding will notify the Director for Guildhall Young Artists & Safeguarding, Guildhall School Principal and the Local Authority Designated Officer (LADO) for the City of London (and/or the Local Authority in which the incident took place).

All safeguarding referrals / incident forms to the Head of Safeguarding will be recorded and confidentially stored in accordance with the Data Protection Act 2018.

If, at any point, there is a concern of immediate and/or ongoing serious risk of harm to a child a referral should be made to Children's Services or the Police **immediately**. Anybody can make such a referral however an alert should then be made on the **same day** to the Head of Safeguarding and the relevant Designated Safeguarding Lead to make them aware of the concerns. This will ensure vital follow up work will be completed for further support and protection of the student.



### **5.3 Prevent referrals:**

Concerns about a student, member of staff or visitor possibly being radicalised should be referred to the Head of Safeguarding or in the HoS absence to the Director of Guildhall Young Artists and Safeguarding immediately as per the above process. This will be dealt with in the same way as other safeguarding concerns referring to specialist agencies where appropriate. The Head of Safeguarding will seek consultation on a case by case basis with the City of London Prevent Team, the FE/HE Regional Prevent coordinators for London, the Director of Guildhall Young Artists and Safeguarding and where appropriate Children Services / Adult Safeguarding prior to any referrals. The Director of Guildhall Young Artists and Safeguarding will also alert the Principal; Head of Human Resources (where appropriate) and Safeguarding Lead Governors about any potential referrals to the Channel Programme (the Channel process is a key part of the Government's Prevent Strategy).

### **6. Safer Recruitment**

Safer recruitment is a set of safe practices which Guildhall School uses to recruit staff and volunteers who are suitable to work with children and adults.

Part of Guildhall School's safeguarding culture is to adopt recruitment procedures that help deter, reject or identify people who might abuse children or adults at risk. Governing bodies and proprietors must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence, including criminal record checks (Disclosure and Barring Service checks), Barred List checks and Prohibition checks, together with references and interview information.

For more information on Guildhall School's approach to recruiting staff or volunteers safely, please see the **Safer Recruitment Policy** link (Appendix 4) and for details on contractors / students working in professional contexts see Appendix 7.

### **7. Managing Allegations against professionals and volunteers**

Guildhall School will ensure that concerns or complaints from children, staff and volunteers are taken seriously and procedures for managing allegations are always followed as per national statutory guidance (see Keeping Children Safe in Education, 2019 and Working Together to Safeguard Children, 2018). For more information regarding the reporting process for an allegation against a professional or a volunteer, please see **Appendix 5**.

### **8. Creating a Safeguarding Culture**

*Please reference Appendix 3 for abuse definitions and other safeguarding topics such as Child Sexual Exploitation, Female Genital Mutilation, Prevent etc.*

#### **8.1 Safeguarding Inductions for new staff and mandatory safeguarding training for all staff:**

It is essential that all staff who have access to children and adults at risk understand their safeguarding responsibilities and what to do in the event a disclosure is made to them or they have reason to suspect that abuse is taking place.

All staff will receive training in safeguarding and Prevent as part of their induction. Staff will subsequently receive training and updates on safeguarding at least every three years. Designated Safeguarding Leads (DSLs) require the following training every two years: DSL Training, Safer Recruitment Training, Safeguarding Training and Prevent.

Owing to the nature of the School's staffing body, e-learning has been identified as the best tool for ensuring that staff, (some of whom may only be onsite on Saturdays or during the holidays) have access to training. However, there are ongoing "face to face" safeguarding briefings provided to staff by the Head of Safeguarding throughout the year, as well as access to other training events as appropriate.

All members of staff will receive a copy of the Guildhall School Safeguarding Policy and will be required to sign a Safeguarding Declaration form to confirm they have read the policy, understand the processes for and expectations of safeguarding at Guildhall School and agree to adhere to these expectations.

New members of staff also receive a Safeguarding Induction package from the Head of Safeguarding with valuable information regarding safeguarding processes.

### **8.2 Risk assessments of School activities not on School premises (children)**

If a missed lesson is to be made up it should ideally take place on School premises. If the lesson has to take place in a teacher's or student's house the parent/carer must sit in. Parents will be asked to sign a document acknowledging this. Staff must furthermore follow the guidance contained within the Code of Conduct policy.

Risk assessments must be carried out in advance of utilising non-Guildhall School premises for lessons or activities in line with the Hire of Outside premises policy and risk assessment process.

All travel within the UK and overseas will be organised in accordance with the relevant travel policy and guidance document and the risk assessment pro forma completed. Travel authorisation must be sought in advance from the Head of Department.

### **8.3 Guildhall School's Anti-Bullying and Anti-Discrimination statement:**

Guildhall school respect difference and welcome diversity in our students and staff. We strive to ensure that our activities and programmes are inclusive.

Guildhall students have the right to feel safe, secure and valued when they attend our programmes and therefore, we will have zero tolerance for bullying or discriminating behaviour.

We will promote a range of positive and supportive strategies to deal with any reports regarding bullying or discriminating behaviour.

Any concerns or incidents involving bullying will need to be reported to the Designated Safeguarding Leads or directly to the Head of Safeguarding.

Appropriate and proportionate action will be taken and if necessary, other agencies may be consulted or involved, such as: the police (if a criminal offence has been committed) or other local services if a student is felt to be at risk of serious or significant harm.

### **8.4 Guildhall School's commitment to the Prevent Duty**

From 18 September 2015 all schools and colleges have a duty under section 26 of the Counter – Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent Duty. Any concern should be reported to the Head of Safeguarding in the first instance. Guildhall School will consider the level of risk to identify the most appropriate referral, which could include the Channel Panel or Children's Social Care, for example. Guildhall school has policies which set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by students themselves – are suitable and appropriately supervised. Please see the Prevent Reporting flow chart at the start of this policy and also Appendix 4.

### **We are committed to reviewing our safeguarding policy and good practice annually.**

This Safeguarding Policy was submitted to the Board of Governors of the Guildhall School of Music & Drama for approval on 23 September 2019.

**Date of next revision August 2020.**

HVR/AM 02/09/2019

## Appendices

### Appendix 1

#### Key contact details

##### Director of Guildhall Young Artists and Safeguarding

**Name:** Alison Mears

**Phone:** 0207 382 7160

**Email:** [alison.mears@gsmd.ac.uk](mailto:alison.mears@gsmd.ac.uk)

##### Head of Safeguarding

**Name:** Hetsie van Rooyen

**Phone:** 0207 628 2571 ext 3088

**Email:** [hetsie.vanrooyen@gsmd.ac.uk](mailto:hetsie.vanrooyen@gsmd.ac.uk)

##### Designated leads for safeguarding (DSLs)

###### **i) Junior Guildhall**

##### DSL: Head of Junior Music Courses

**Name:** Nigel Springthorpe

**Phone:** 0207 382 7160

**Email:** [nigel.springthorpe@gsmd.ac.uk](mailto:nigel.springthorpe@gsmd.ac.uk)

##### DSL: Head of Strings

**Name:** William Bruce

**Phone:** 07590 826518

**Email:** [William.Bruce@gsmd.ac.uk](mailto:William.Bruce@gsmd.ac.uk)

##### DSL: STP Felsted

**Name:** Rachael Bull

**Phone:** 020 7382 7160

**Email:** [Rachael.Bull@gsmd.ac.uk](mailto:Rachael.Bull@gsmd.ac.uk)

**LADO SERVICES ESSEX:** 03330 139 797.

**ii) CYM London**

**London CYM DSL:**

**Name:** Geoff Harniess

**Phone:** 0207 928 3844

**Email:** gharniess@cym.org.uk

**Deputy DSL**

**Name:** Gill Tarlton

**Phone:** 0207 928 3844

**Email:** gtarlton@cym.org.uk

**LADO SERVICES LAMBETH:** 020 7926 4679 or email LADO@lambeth.gov.uk

**iii) CYM Regional Centres**

**Head of Regional Centres**

**Name:** Nikki Shepperd

**Phone:** 0208 819 9040

**Email:** nikki.shepperd@gsmd.ac.uk

**Taunton CYM DSL:**

**Name:** Rachael Parvin

**Phone:** 07754217993

**Email:** RParvin@cym.org.uk

**Deputy DSL**

**Name:** Sarah-Jane Cross

**Phone:** 07754217993

**Email:** sjcross@cym.org.uk

**LADO SERVICES TAUNTON:** Phone Somerset Direct on 0300 123 2224 for a referral

**Saffron Walden CYM DSL:**

**Name:** Kate Nott

**Phone:** 07527754671

**Email:** knott@cym.org.uk

**Deputy DSL:**

**Name:** Sophie Stafford

**Email:** sstafford@cym.org.uk

**LADO SERVICES SAFFRON WALDEN:** Essex duty LADO on 03330 139 797

**Norfolk CYM DSL:**

**Name:** Juliet Rickard

**Phone:** 07786 122374.

**Email:** jrickard@cym.org.uk

**Deputy DSL:**

**Name:** David Stowell

**Phone:** 07766 163576

**Email:** dstowell@cym.org.uk

**LADO SERVICES NORFOLK:** 01603 223473 or email query to LADO@norfolk.gov.uk

**Peterborough CYM DSL:**

**Name:** Kirsten Goldthorp

**Phone:** 07920160035

**Email:** Kirsten.Goldthorp@peterborough.gov.uk

**Deputy DSL:**

**Name:** Morag Richardson

**Phone:** 07908 223670

**Email:** morag.richardson@peterborough.gov.uk

**LADO SERVICES PETERBOROUGH:** 01733 864038

iv) **Creative Learning and Enterprise**

**Director of Learning and Engagement**

**Name:** Sean Gregory

**Phone:** 0207 628 7381

**Email:** sean.gregory@barbican.org.uk

**Director of Creative Learning**

**Name:** Jenny Mollica

**Phone:** 020 7382 2339

**Email:** Jenny.Mollica@barbican.org.uk

**Senior Creative Learning Manager**

**Name:** Lauren Monaghan-Pisano

**Phone:** 0207 382 6153

**Email:** lauren.monaghan-pisano@barbican.org.uk

**Short Courses DSL:**

**Name:** Laurie Michel-Hutteau

**Phone:** 0207 382 7191

**Email:** laurie.michel-hutteau@gsmd.ac.uk

**Deputy DSL:**

**Name:** Tom Steer

**Phone:** 020 7382 3065

**Email:** tom.steer@gsmd.ac.uk

**v) [GYA Islington](#)**

**Name:** Spencer Down

**Phone:** 020 3771 7003

**Email:** spencer.down@gsmd.ac.uk

**Deputy DSL:**

**Name:** . Christie Haddard

**Phone:** 020 3771 7003

**Email:** christie.haddard@gsmd.ac.uk

vi) [Senior Guildhall School DSL \(for Senior School student concerns\):](#)

**Secretary & Dean of Students**

**Name:** Katharine Lewis

**Phone:** 020 7382 7143

**Email:** [katharine.lewis@gsmd.ac.uk](mailto:katharine.lewis@gsmd.ac.uk)

**Deputy DSL:**

**Name:** Dr Stacey Balsdon

**Phone:** 0207 382 5272

**Email:** [stacey.balsdon@gsmd.ac.uk](mailto:stacey.balsdon@gsmd.ac.uk)

**Appendix 2**

**GSMD Safeguarding Incident & Disclosure Form**

**Date concern is reported or disclosed:**

Child /Young Person / Adult at risk's Full Name:

Date of birth:

Address of child/adult at risk:

Parent/carer contact details (where relevant):

**1. RECORD THE FOLLOWING IN THE CHILD / ADULT'S OWN WORDS:**

DATE OF THE ALLEGED INCIDENT:

WHO WAS INVOLVED?

WHERE DID IT HAPPEN?

ANY VISIBLE INJURIES OBSERVED? **YES / NO**

IF YES, WHERE ARE THE INJURIES LOCATED AND WHAT DOES IT LOOK LIKE?

**ANY OTHER OBSERVATIONS WHICH WILL ASSIST RISK ASSESSMENTS?**

**2. ACTIONS TAKEN**

WHO DID YOU REPORT THIS CONCERN TO?

DATE YOU REPORTED THE CONCERN:



ARE THE PARENTS OF THE CHILD / YOUNG PERSON AWARE OF THE DISCLOSURE OR CONCERN? **YES / NO**

IS THE CHILD AT IMMEDIATE RISK OF HARM? **YES / NO** (PLEASE PROVIDE REASONS FOR THIS)

**3. DATE FORM SENT TO THE HEAD OF SAFEGUARDING:**

*Check to make sure your report is clear now – and will be clear to a new reader in the future.*

**PLEASE PASS THIS FORM ON THE SAME DAY TO THE DESIGNATED LEAD FOR SAFEGUARDING WITH A COPY TO THE HEAD OF SAFEGUARDING WITHIN 24 HOURS OF THE DATE THE CONCERN WAS REPORTED.**

IN THE ABSENCE OF THE HEAD OF SAFEGUARDING PLEASE COPY TO THE DIRECTOR OF GUILDHALL YOUNG ARTISTS AND SAFEGUARDING.

Signature of Staff Member:

Name of staff member<sup>1</sup> (printed):

Position:

Date:

Time:

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<sup>1</sup> Includes temporary, support staff contractors, volunteers, students on work placements

## Appendix 3

### DEFINITIONS OF ABUSE & SAFEGUARDING TOPICS

#### **Adult Safeguarding:**

The Care Act statutory guidance of 2014 defines adult safeguarding as:

*'Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'*

Staff must act when they have "reasonable cause to suspect" that an adult:

- has needs for care and support,
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself / herself against the abuse or neglect or the risk of it.' (Care Act 2014, section 42)

Adult safeguarding is for people who, because of issues such as dementia, learning disability, mental ill-health or substance abuse, have care and support needs that may make them more vulnerable to abuse or neglect.

**For further Adult Safeguarding abuse definitions please access the following link:**

<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

#### **Safeguarding for under 18's:**

**'Working Together to Safeguard Children' 2018 and 'Keeping Children Safe in Education' September 2019 define under 18 abuse and safeguarding topics as:**

##### **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

##### **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 fabricates the symptoms of, or deliberately induces illness in a child.

##### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing age or developmentally inappropriate expectations 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;
- Seeing or hearing the ill-treatment of another e.g. where there is domestic abuse;
- Serious bullying, causing children frequently to feel frightened or in danger;
- Exploiting and corrupting children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse also includes non-contact activities, such as involving children in looking at sexual images, including online or on mobile phones, or involving them in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Please note that perpetrators of sexual abuse could be peer on peer or adults regardless of gender.

Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution for young people of similar age (as consenting partners) is not usual. However, where a child is under the age of 13 it is classified as rape under s5 of the **Sexual Offences Act 2003**.

### 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 misuse, maternal mental ill health or learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.

Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);

- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.

### **Domestic Abuse / Violence:**

Included in the four categories of child abuse and neglect above, are a number of factors relating to the behaviour of the parents and carers which have significant impact on children such as **domestic abuse**. Research analysing Serious Case Reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject of Child Protection Plans. Children can be affected by seeing, hearing and living with domestic abuse as well as being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16 and 17 year olds have been found in recent studies to be increasingly affected by domestic abuse in their peer relationships.

### **The Home Office definition of Domestic Violence and Abuse was updated in May 2018 as:**

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

- Psychological;
- Physical;
- Sexual;
- Financial;
- Emotional."

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

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

In addition, Working Together to Safeguard Children 2018 has introduced the concept of **Contextual Safeguarding** which recognises that as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online.

These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

**Female Genital Mutilation:** The term FGM covers all harmful procedures to the female genitalia for non-medical purposes. There are 4 types - **all are illegal** and have serious health and safeguarding risks. Regulated health and social care professionals, teachers and staff in England and Wales **must** report 'known' cases of FGM in under 18's to the police (Home Office, 2016). Statutory guidance on the responsibility to report FGM can be found in "*Mandatory reporting of female genital mutilation:*

*procedural information, 2015” and also in: “Multi-agency statutory guidance on female genital mutilation, April 2016”.*

**Forced Marriage:** A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

**The pressure put on people to marry against their will may be:**

- physical – for example, threats, physical violence or sexual violence
- emotional and psychological – for example, making someone feel like they are bringing ‘shame’ on their family
- financial abuse, for example taking someone’s wages, may also be a factor.

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

**Child criminal exploitation** is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines and includes for instance children forced to work on cannabis farms or to commit theft.

**Prevent Strategy:** The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the **Counter-Terrorism and Security Act 2015** this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

**Sexual violence and sexual harassment between children in schools and colleges Guidance, 2018:**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

## Appendix 4

### Online policy links

*Please ensure you familiarise yourself with the contents of these policies. Copy and paste the link into your online search-bar.*

#### **Safer Recruitment policy:**

<https://www.cityoflondon.gov.uk/services/Documents/safeguarding-policy-2017.pdf>

#### **Whistleblowing policy:**

<https://www.cityoflondon.gov.uk/about-the-city/how-we-make-decisions/Documents/whistleblowing-policy-2017.pdf>

#### **Code of Conduct:**

<http://democracy.cityoflondon.gov.uk/documents/s28606/Employee%20Code%20Of%20Conduct%20-%20revised.pdf>

#### **Staff / Student Relationship policy:**

[https://www.gsmd.ac.uk/fileadmin/user\\_upload/files/Policies\\_and\\_Reports/Staff\\_Student\\_Relationship\\_Policy\\_-\\_final\\_version\\_Feb\\_2019.pdf](https://www.gsmd.ac.uk/fileadmin/user_upload/files/Policies_and_Reports/Staff_Student_Relationship_Policy_-_final_version_Feb_2019.pdf)

#### **External hire of school premises:**

[https://www.gsmd.ac.uk/fileadmin/user\\_upload/files/Policies\\_and\\_Reports/Hire\\_of\\_Outside\\_Venues\\_Policy\\_Feb\\_2018.pdf](https://www.gsmd.ac.uk/fileadmin/user_upload/files/Policies_and_Reports/Hire_of_Outside_Venues_Policy_Feb_2018.pdf)

#### **Adult Safeguarding guidance / The Care Act:**

<https://www.scie.org.uk/care-act-2014/safeguarding-adults/>

## Appendix 5

### Managing Allegations against professionals and volunteers

**This process should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has:**

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

**Please note that though the above definition is as per statutory guidance for children (“Keeping Children Safe in Education, 2019) Guildhall school includes adults at risk in identifying allegations against staff.**

In the first instance, the Head of Safeguarding should be contacted with reports of inappropriate behaviour or abuse (whether physical, sexual, emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and children for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if the child is 16 years or older and the relationship is otherwise consensual;
- Initiating a sexual relationship with a student who is vulnerable (e.g. through disability) even if the relationship is otherwise consensual;
- 'Grooming' i.e. meeting a child under the age of 16 with intent to commit a relevant offence;
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (e.g. inappropriate text-e-mail messages or images, gifts, socialising etc....);
- Possession of indecent photographs / pseudo-photographs of children.

The Head of Safeguarding will alert the Director of Guildhall Young Artists & Safeguarding of all allegations and a decision will be made to contact the LADO immediately on the day that an allegation is made. The Director of Guildhall Young Artists & Safeguarding will also inform the Principal and Chair of Governors. If an allegation is made against the Principal, then the Chair of Governors is to be informed immediately.

It is important that appropriate support is offered to staff against whom an allegation is made. The staff member concerned will be advised to consult their union or professional body to ensure they are offered support.

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not:

- Investigate or ask leading questions, but only seek clarification of the allegation/concern;
- Make assumptions or offer alternative explanations;
- Promise confidentiality but give assurance that the information will only be shared on a 'need to know' basis.

Advice will be sought from the LADO within **one working day** and additional advice if needed from the police and/or LA children's social care about how much information should be disclosed to the accused person. **A LADO referral should not be delayed in order to gather information.**

**Failure to report an allegation or concern in accordance with procedures is serious and a potential disciplinary matter.**

The LADO will advise on whether or not informing the parents of the child/ren involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, parent/s /carer/s will be contacted. In some cases, however, the parent/s/carer/s may need to be told straight away (e.g. if a child is injured and requires medical treatment).

Subject to restrictions on the information that can be shared, the accused person will be informed as soon as possible about the nature of the allegation, how enquiries will be conducted and the possible outcomes (e.g. disciplinary action, dismissal or referral to a barring list or regulatory body). The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be kept informed of the progress and outcome of any investigation and the implications for them;
- Be informed about any disciplinary or related process;
- Given the opportunity to be accompanied at meetings by a work place colleague or a recognised trade union representative
- If suspended, be kept up to date about events in the workplace.

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated and considered. Apart from keeping the child, parents/carers and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who 'need to know' in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association. Human resources should be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

**Suspension will be considered in any case where:**

- There is cause to suspect a child or vulnerable adult is at risk of significant harm; or
- The allegation warrants investigation by police; or
- The allegation is so serious that it might be grounds for dismissal.
- Where there is a possibility that the employee may interfere or attempt to influence the outcome of the investigation

The HoS should liaise closely with the LADO and other agencies during the investigation process and should keep the Director of Guildhall Young Artists, the Principal and Chair of Governors informed of the progress and LADO outcomes.

Only Guildhall School has the power to suspend an accused employee and it cannot be required to do so by Local Authority professionals or police.

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by the School, they should report the matter to the LADO.

It is in everyone's interest for cases to be dealt with expeditiously, fairly and thoroughly and for unnecessary delays to be avoided.

## **Appendix 6**

### **Leadership and governance information**

The Board of Governors of Guildhall School has overall responsibility for ensuring that there are sufficient measures in place to safeguard all students at risk. Governors will receive a copy of this policy and training in safeguarding.

Guildhall School adheres to the principles of all relevant legislation and works in partnership with various agencies involved with child protection. Two suitably qualified Lead Safeguarding Governors have been nominated with overall oversight responsibility for students at risk and other safeguarding matters.

The Director of Guildhall Young Artists and Safeguarding will submit an annual report to the Board of Governors on safeguarding. This report will provide the Board with monitoring information to enable the Board to consider whether the School's safeguarding duties are effectively discharged. This report will include information in respect of staff training; anonymous case details and safeguarding quality assurance processes.

The Head of Safeguarding provides a bi-weekly Safeguarding Report to the Director of Guildhall Young Artists which is then presented to the Senior Management Team. This ensures transparency through case updates and risk assessments. The Head of Safeguarding is furthermore responsible for liaising with the other safeguarding contacts within Guildhall School, the relevant Local Authority Designated Officers and welfare agencies as appropriate in relation to: policy and practice, on-going



training, record keeping and providing this date to inform the Director of Guildhall Young Artists and Safeguarding's annual reporting to the Board.

All members of the Guildhall School Board of Governors will undergo suitable DBS checks.

## **Appendix 7**

### **Contractors and additional student information**

All staff or contractors who regularly come into contact with children and/or adults at risk, including contracted support staff such as cleaners and caterers will be required to have an appropriate DBS check.

Contractors must be appropriately supervised while on site. The supervision of contractors is the responsibility of the department employing them.

It is recognised that it is not possible to subject visitors to Disclosure and Barring Service checks, and therefore all visitors must be appropriately supervised by Guildhall School staff at all times. Visitors must not be left alone with children.

### **Students working in professional contexts**

The Guildhall School will ensure that all senior School students who will work unsupervised with children or adults at risk as part of their programme of studies will complete a disclosure application form and undergo a Disclosure and Barring Service Disclosure (see also the School's "Admission of Students and Criminal Conviction Policy"). The cost of the DBS disclosure for students will be paid for by the School, through the Registry Department.

The School will ensure that all students have the opportunity to achieve the award for which they have registered, regardless of the outcome of the DBS disclosure, by making alternative study pathways available.

Before a student is sent to a work placement where there are children or adults at risk, they will be provided with a briefing by their course tutor(s) and a copy of this policy.

### **One-to-one / Individual Teaching off campus**

It is recognised that, occasionally, Music Professors contracted by the Senior School of the Guildhall School of Music & Drama, and where permitted by their department\* will teach 1-1 lessons off campus in their own home/studio.

It is noted that this is a limited and occasional practice.

Students should be made aware – in advance and preferably at the consultation lesson stage – if the professor may fall into the above category.

As no reimbursement is given to students for travel to professors' homes for 1-1 lessons, students should take this into consideration if they wish to study with a professor who may – at times – teach at home or when accepting or arranging lessons which will take place off campus. Under no circumstances would students be expected to change teacher, should their teacher conduct some classes off site.

All Professors, whether occasionally teaching at home or not, will have completed the online Child Protection in Education training

It is noted that any student attending a 1-1 lesson in premises off the School campus will be over the age of 18 and that no student who has gained non-standard entry to the School via the "Under 18 Admissions Policy" will receive 1-1 lessons off campus unless special arrangements are put in place.

The Chamberlain's Department has confirmed that any professor carrying out School contracted work off Campus is covered by the School's Public and Employers Liability Insurance: "If the tutors are CoL/GSMD/Barbican employees rather than contractors, then our Public and Employers Liability policy covers lessons taking place at the tutors home, if the lessons are given during the course of the tutors employment, not if they are private lessons for which the tutor charges a separate fee"

A generic Risk assessment will be in place on the City Risk Assessment Register

\*please note that some department do not permit teaching off Campus. Departments, where occasional teaching from home is permitted, will take issues of practicability (e.g distance of travel) into account when approving this practice.

## **Appendix 8**

### **Recommendations to staff / volunteers working with Guildhall School students**

Please also see "*Staff Code of Conduct*" in Appendix 4 of this policy.

#### **Staff (and students) shall:**

- Act in a professional manner at all times.
- Dress appropriately at all times, showing respect for pupils and members of the community;
- Be vigilant - Maintain an attitude of "it could happen here".
- Ensure they have read and understand the Guildhall Safeguarding Policy 2019; Keeping Children Safe in Education, 2019; Working Together to Safeguard Children, 2018 and the Care Act 2014.

#### **Advice to Staff**

##### **Please do not:**

- Share confidential or sensitive information about a child or their family unless within a safeguarding context to the safeguarding leads.
- Take photos / videos of children: This can't be done without the expressed consent from parents as per the Photo Permission Forms Guildhall School uses. Sharing photos and videos of students on your personal online social media platforms is not allowed.
- Make suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted. Inappropriate remarks include innuendo, swearing, and discussing their or your own intimate relationships.
- Communication with students: If electronic communication is necessary to communicate directly with parents or guardians and copy them into emails.
- Communicate with students via any social media platform (Twitter, Facebook or other social media applications) is not advised. Never accept a student as a "friend" or "follower" on any social media platform.
- Engage in behaviour which could be construed as 'grooming' a child (for example giving a child money, presents or favours or talking or behaving in an inappropriate or unprofessional manner towards children).
- It is not unusual for pupils or, sometimes, their parents to develop infatuations or "crushes" on staff. Staff must not keep this a secret. All such situations must be responded to sensitively to maintain the dignity of those concerned and any indications that this might be happening has to be reported to the Head of Safeguarding immediately.

- It is not permissible to take children alone in a car on journeys, however short.

### **Safeguarding recommendations for managing Student Disclosures:**

- Always have a vigilant attitude of 'it could happen here' where safeguarding is concerned.
- When a disclosure is made to you stay calm, listen carefully and take the information provided by a student seriously. It is important not to deter students from making a disclosure of abuse through fear of not being believed.
- Never promise to keep a disclosure of abuse a secret but explain why and to whom you would need to share the information with.
- Ask open questions only (Who? When? Where? How? What happened?) avoiding questions that can only suggest a particular answer.
- Please always reassure any student that they have done the right thing to disclose a concern. Explain what you will do next and how you will keep them informed of the progress of actions.
- Always remember that those who abuse children can be of any age (even other children), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.

### **Safeguarding recommendations to reduce the risk of allegations against staff**

- All adults who work with children are potentially at risk from accusations of abuse or inappropriate behaviour. Therefore, all staff are advised to exercise common-sense and caution to ensure as far as possible that their behaviour is never open to misinterpretation.
- Guildhall school does not wish for general positive aspects of student life to be replaced by excessive formality, or for there to be a climate of suspicion and distrust, but it is essential that a proper professional distance is maintained between staff and students.
- **Some top tips to staff:** If you are alone with a student in a room, ensure there is no obstruction of view into the room. Most rooms at Guildhall and other sites have glass panels in the door or screens outside the room – please ensure these windows remain unobstructed and that the screen outside the door is fully functioning. If not, please report any faults immediately to Facilities.
- If you do need to touch a student as part of the lesson, explain in advance that you are going to do so, why you need to do this and make sure you have the student's permission to proceed.
- Take care when commenting on a student's appearance. A casual remark can also be misinterpreted or misrepresented.
- If you are asked to give a student under 18 extra tuition or a private lesson in their own home, you should consult your Head of Department before agreeing to this.
- Staff should never give alcoholic drinks to under 18 students and should avoid situations in which their presence could be interpreted as permitting or encouraging students to drink.
- Declare any gifts / presents given to you to your Head of Department.
- Please do not be afraid to ask for advice from the Head of Safeguarding or your department's DSL if you are unsure if a situation is safe.
- All Staff must follow the City of London Corporation's Social Media policy.
- For staff who has a school email address: please use your school email address and students' school email addresses when communicating with students by email.

## **Appendix 9**

### **External Events and Speakers procedure and approval process**

The Guildhall School of Music and Drama does not generally host “external speaker” type events. Therefore, rather than a separate External Speaker Policy, the Maintaining good campus relations in higher education policy exists in order to protect the rights and freedoms of our students, staff and visitors, and to ensure that the institution balances this with its legal requirement to secure freedom of speech. The policy covers all events hosted by the School, the Students’ Union and events hosted by third party organisations that take place on our premises.

Most events present a low level of risk and the majority of external speaker requests will be straightforward and can be handled entirely at a departmental level. However, some may be complex and may require referral for further consideration. The referral process below will only apply in exceptional circumstances where events or speakers are deemed to be higher-risk. In order to ensure the effective implementation of the policy across the institution, all events will be overseen by the events committee.

The person organising the event must undertake a first assessment of the proposed external speaker or event and if there are any concerns, escalate the decision about whether to invite that speaker as set out in the process below. Local assessment of proposed external speakers or events will consider the following questions:

- Has the speaker previously been prevented from speaking at Guildhall or another similar establishment or previously been known to express views that may be in breach of the Maintaining good campus relations in higher education policy?
- Does the proposed title or theme of the event present a potential risk that views or opinions expressed by speakers may be in breach of the Maintaining good campus relations in higher education policy?
- Is the proposed speaker or theme likely to attract attendance from individuals or groups that have previously been known to express views that may be in breach of the Maintaining good campus relations in higher education policy?

If the answer to any of the questions is yes or unclear, the event organiser must refer the request to the Events committee

Due diligence might include an internet search, review of social media, discussions with institutions who have hosted similar events to see if there were any issues of concern or liaison with local police. Mitigating action could include allowing the event to go ahead with restrictions to reduce risk including observation of the event, restrictions the materials to be distributed at the event, the inclusion of opportunities to debate the opposing view or additional security.

Ideally an event or speaker proposal would be submitted in good time to allow further discussion by the committees. In an emergency a referral can be made directly to the Principal.

Failure by a member of staff or student to comply with this policy will be treated very seriously and may be subject to formal action under the normal disciplinary processes for staff and students.

## Event Approval Procedure

