

## **Safeguarding Policy**

*Last revised: 8 March 2023*

### **1 Overview**

- 1.1 Our charitable activities may include working with vulnerable people. The purpose of this policy is to protect children and vulnerable adults and provide stakeholders and the public with the overarching principles that guide our approach in doing so.
- 1.2 Specifically, this policy explains how we will:
- protect people from harm;
  - make sure people can raise safeguarding concerns;
  - handle allegations or incidents;
  - respond to complaints, including reporting to the relevant authorities.
- 1.3 As part of fulfilling their legal duties<sup>1</sup>, trustees must take reasonable steps to protect from harm people who come into contact with their charity. This includes: the charity's beneficiaries, employees, volunteers and those connected with the activities of the charity. This should be a governance priority for all charities and is a fundamental part of operating as a charity for the public benefit.
- 1.4 Trustees should set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance these will be handled sensitively and properly.
- 1.5 Trustees are responsible for protecting people and safeguarding, even if certain aspects of the work are delegated to others.
- 1.6 Trustees must be aware of, and comply with, Charity Commission guidance on safeguarding and protecting people<sup>2</sup>. Trustees should be aware of the UK Government's ten recommended actions that boards of trustees should take<sup>3</sup>.

### **2 Safeguarding Principles**

- 2.1 The LFCCM believes that:
- Nobody who is involved in the activities of the charity should ever experience abuse, harm, neglect or exploitation.
  - We all have a responsibility to promote the welfare of all of our administrators, composers, performers, and volunteers to keep them safe and able to work in a way that protects them.

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1 <https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/strategy-for-dealing-with-safeguarding-issues-in-charities#trustees-duties>

2 <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

3 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/756636/10\\_safeguarding\\_actions\\_for\\_charity\\_trustees\\_infographic.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf)

- We all have a collective responsibility for creating a culture in which our people not only feel safe, but also able to report any concerns they may have.

### **3 Scope**

- 3.1 This safeguarding policy applies to anyone *directly* contributing to any activity of the LFCCM, including the trustees, administrators, and participating artists.
- 3.2 This safeguarding policy does *not* apply to anyone *indirectly* contributing to activities promoted by the LFCCM but not directly administered by the charity, for example activities designed and managed by participating churches.

### **4 Definitions**

- 4.1 Safeguarding: describes arrangements in place to protect children and adults at risk in vulnerable circumstances from abuse or neglect.
- 4.2 Child / Children: for this policy’s purposes, “child” refers to anyone under the age of 18 and therefore not legally an independent adult. Particular care should be afforded to children under the age of 16.
- 4.3 Vulnerable Adult: any person aged 18 or over (an “adult”) whose ability to protect themselves from violence, abuse, neglect, or exploitation is significantly impaired through physical or mental disability, illness, age, emotional fragility, distress, or any other reason.
- 4.4 Adult at Risk: any person aged 18 or over (an “adult”, vulnerable or otherwise) who needs to engage in any activity that may put them at risk. In this context it is the activity and the need for it, rather than the adult’s particular personal characteristics, which determines whether the adult is at risk at any given time.
- 4.5 Abuse: can be physical, psychological or emotional, financial, sexual or institutional abuse, including neglect and exploitation. It is a legal requirement that the charity be alert to the following types of risks, whether online or in person:
- sexual harassment, abuse, and exploitation;
  - criminal exploitation;
  - a culture within the charity that allows or condones poor behaviour and poor accountability;
  - people abusing a position of trust they hold within the charity;
  - bullying or harassment;
  - health and safety;
  - commercial exploitation;
  - cyber abuse;
  - discrimination on any of the grounds in the Equality Act 2010;
  - people targeting the charity;
  - data breaches, including those under General Data Protection Regulations (GDPR);
  - negligent treatment;
  - domestic abuse;

- self-neglect;
- physical or emotional abuse;
- extremism and radicalisation;
- forced marriage;
- modern slavery;
- human trafficking;
- female genital mutilation.

Appendix A lists some signs of abuse in children and vulnerable adults.

## **5 Partner Organisations**

- 5.1 For performance-based activities managed directly by the LFCCM, such as concerts and workshops, the safeguarding policy of partner organisations (such as the performance venue) should be considered in addition to this policy.
- 5.2 Partner organisations (such as performance venues) involved in performance-based activities managed directly by the LFCCM must have their own safeguarding procedures that, as a minimum, must meet the standards outlined below. The policies may include any additional legal or regulatory requirements specific to their work. Regulatory requirements may include, but are not limited to:
- Other UK regulators as applicable<sup>4</sup>, such as Ofsted<sup>5</sup>, CQC<sup>6</sup>, DfES<sup>7</sup>, NHS<sup>8</sup>;
  - Other requirements or frameworks for those working overseas<sup>9</sup>, if applicable;
  - The International Child Safeguarding Standards<sup>10</sup>;
  - Keeping children safe online assessment tool<sup>11</sup>.
- 5.3 Where a venue is directly providing its own staff, volunteers, or other stakeholders to manage and produce a project, the safeguarding policy of that venue should take precedence over this policy.
- 5.4 Where the safeguarding policy of a performance venue hired by the LFCCM explicitly defers safeguarding responsibility to the external body hiring the venue, this policy should apply.
- 5.5 Safeguarding should be appropriately respected in other relevant partner organisation policies and procedures.

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4 <https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/safeguarding-the-role-of-other-agencies>

5 <https://www.gov.uk/government/publications/ofsted-safeguarding-policy>

6 <https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-13-safeguarding-service-users-abuse-improper>

7 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

8 <https://www.england.nhs.uk/safeguarding/>

9 <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#working-overseas>

10 <https://www.keepingchildrensafe.global/wp-content/uploads/2020/02/KCS-CS-Standards-ENG-200218.pdf>

11 <https://www.keepingchildrensafe.global/your-self-assessment/>

## **6 Protecting People from Harm**

6.1 Trustees have responsibility for the safety of all involved in the charity. Trustee responsibilities include:

- Creating a culture of respect, in which everyone feels safe and able to report concerns;
- An annual review of safeguarding policies;
- Providing oversight of any lapses in safeguarding;
- Ensuring that any issues are properly investigated and dealt with quickly, fairly, and sensitively, and any reporting to the Police/statutory authorities is carried out;
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of an overall risk management policy;
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers for projects that involve children and adults at risk;
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required;
- Ensuring that safeguarding requirements (for example, DBS checks) and responsibilities are reflected in job descriptions, appraisal objectives, and personal development plans, as appropriate;
- Listening and engaging with administrators, volunteers, and others and involving them as appropriate;
- Responding to any concerns sensitively and acting quickly to address these;
- Ensuring that personal data is stored and managed safely that is compliant with data protection regulations, including valid consent to use any images or video;
- Making administrators, volunteers, and other stakeholders aware of our safeguarding policy and their specific safeguarding responsibilities;
- Being aware of the signs of potential abuse as detailed in Appendix A, and how to report these internally and externally as detailed in Appendix B.

6.2 Administrative committee members have responsibility for ensuring safeguarding is appropriately taken into account during project management. Responsibilities include:

- Being aware of our safeguarding policy and their specific safeguarding responsibilities;
- Planning LFCCM projects and activities to take into account potential safeguarding risks, to ensure these are adequately mitigated, or (ideally) avoided;
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that records of DBS clearances and safeguarding training are kept up-to-date;
- Ensuring that personal data is stored and managed safely that is compliant with data protection regulations, including valid consent to use any images or video;
- Being aware of the signs of potential abuse as detailed in Appendix A, and how to report these internally and externally as detailed in Appendix B.

6.3 The trustees shall appoint a designated Safeguarding Officer (normally one of the trustees), who will serve as the first point of contact for queries and complaints related to safeguarding within the charity.

- 6.4 The charity shall make readily available a one-page guide to safeguarding within the charity that includes the contact details of the designated Safeguarding Officer.
- 6.5 For roles within the charity that involve working with children or adults at risk, Disclosure and Barring Service (DBS) records checks shall be required prior to appointments being made to the role.
- 6.6 All handling of criminal records data within the charity shall comply with the General Data Protection Regulations (GDPR).
- 6.7 Charities that use information from the DBS must have a policy on the recruitment of ex-offenders in order to comply with the DBS Code of Practice<sup>12</sup>. The LFCCM shall not recruit or appoint known ex-offenders<sup>13</sup> as members of the charity.

## **7 Reporting Safeguarding Concerns**

- 7.1 If a crime is in progress or an individual is in immediate danger, call the police.
- 7.2 If you are a member of the public or not otherwise directly affiliated with the LFCCM, make your concerns known either to the designated Safeguarding Officer or to any other member of the charity who will then alert the designated Safeguarding Officer. Concerns can be raised online by emailing [safeguarding@lfccm.com](mailto:safeguarding@lfccm.com).
- 7.3 For trustees and other people directly affiliated with the LFCCM, make your concerns known to the designated Safeguarding Officer, the project leader, or to any member of the LFCCM administration committee. If you feel unable to do so, email [safeguarding@lfccm.com](mailto:safeguarding@lfccm.com), taking care to make your report anonymously if necessary, or report directly to the Charity Commission.

## **8 Whistleblowing**

- 8.1 In situations where administrators, volunteers, or others directly involved with the LFCCM do not feel able to report a safeguarding incident through the channels noted above, a report can be made directly to the Charity Commission. Reports can be made anonymously.
- 8.2 Likewise, any failure of the trustees to adequately address a formal complaint, or any suspicion of continued wrongdoing, can be reported directly to the Charity Commission.
- 8.3 Safeguarding incidents can be reported directly to the Charity Commission by emailing [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk). To make a report, follow the Commission's whistleblowing guidance<sup>14</sup>.

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12 <https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information>

13 "Ex-offender": as defined in the DBS Code of Practice: <https://www.gov.uk/government/publications/dbs-code-of-practice>

14 <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer#report-your-concern-to-the-charity-commission>

8.4 No trustee, administrator, volunteer, or any other person associated in any way with the charity shall attempt to discover the identity of an anonymous whistleblower.

8.5 No trustee, administrator, volunteer, or any other person associated in any way with the charity shall seek retribution or retaliation against any whistleblower.

## **9 Handling of Allegations**

9.1 In the event of a safeguarding incident or allegation of abuse, the trustees shall:

- record it in a secure and responsible way;
- act quickly, ensuring we stop or minimise any further harm or damage;
- report it to all relevant external agencies and regulators when required;
- plan what to report to those involved with the charity (and the media, if appropriate);
- be as open and transparent as possible, so that we build the charity's reputation for acting with integrity, while protecting confidentiality appropriately;
- review what happened to understand how to stop it from happening again;
- review and revise this Safeguarding Policy once the incident has been handled.

9.2 The charity is not expected, and should not attempt, to investigate allegations of abuse independently. Allegations should be referred to relevant external agencies and regulators.

9.3 The responsibility for reporting serious incidents to the Charity Commission rests with the trustees. In practice, this may be delegated to someone else within the charity, such as an administrator or a professional adviser. However, trustees bear ultimate responsibility for ensuring the charity makes a report in a timely manner. Should an incident not be reported that later comes to the attention of the Commission, the trustees will need to justify why the incident was not reported<sup>15</sup>.

9.4 Safeguarding incidents should always be reported if they result in, or risk, significant harm to people who come into contact with the charity through its work.

9.5 Trustees must be aware of, and comply with, UK Government guidance on handling safeguarding allegations.<sup>16</sup>

## **10 Online Risks**

10.1 We identify and manage online risks by ensuring:

- The online services we provide are safe and in line with our code of conduct;
- We protect people's personal data and follow the data handling provisions of the General Data Protection Regulations (GDPR);
- We gain permission to display any images on our website or social media accounts, including consent from individuals, parents, guardians, etc. as necessary;
- We provide a method for reporting concerns online.

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15 <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

16 <https://safeguarding.culture.gov.uk/>

10.2 The email address [safeguarding@lfccm.com](mailto:safeguarding@lfccm.com) is provided for reporting safeguarding concerns, and the email address [gdpr@lfccm.com](mailto:gdpr@lfccm.com) is provided for reporting data handling concerns and answering questions related to handling of personal information.

## **11 Fundraising**

11.1 Trustees and administrators of the charity will ensure that:

- The LFCCM complies with the Code of Fundraising Practice<sup>17</sup>, including fundraising that involves children<sup>18</sup>;
- Administrators and volunteers involved in fundraising are made aware of the Institute of Fundraising guidance on keeping fundraising safe<sup>19</sup> and the NCVO Guidance on Vulnerable People and Fundraising<sup>20</sup>;
- Our fundraising material is accessible, clear, and ethical, and does not place any undue pressure on individuals to donate;
- We do not either solicit nor accept donations from anyone whom we know (or think may not) be competent to make their own decisions;
- We are sensitive to any particular needs that a donor may have.

## **12 Policy Review**

12.1 This policy shall be reviewed by the trustees at least once per year, as well as immediately following the handling of a serious safeguarding incident.

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17 <https://www.fundraisingregulator.org.uk/code/index>

18 <https://www.fundraisingregulator.org.uk/code/working-with-others/fundraising-involving-children>

19 <https://www.institute-of-fundraising.org.uk/guidance/managing-fundraising/safeguarding-and-whistleblowing/keeping-fundraising-safe/>

20 <https://knowhow.ncvo.org.uk/safeguarding/checklists-training-and-other-support/specialist-guides/safeguarding-for-fundraising-managers/people-in-need-of-safeguarding-while-fundraising>

## **Appendix A. Signs of abuse in children and adults at risk**

Some signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality;
- becoming withdrawn;
- seeming anxious;
- becoming uncharacteristically aggressive;
- lacks social skills and has few friends, if any;
- poor bond or relationship with a parent;
- knowledge of adult issues inappropriate for their age;
- running away or going missing;
- always choosing to wear clothes which cover their body.

Some signs that there may be something concerning happening in the life of an adult at risk include:

- becoming quiet and withdrawn;
- being aggressive or angry for no obvious reason;
- looking unkempt, dirty, or thinner than usual;
- sudden changes in character, such as appearing helpless, depressed, or tearful;
- physical signs of harm, such as bruises, wounds, fractures, or other untreated injuries;
- the same injuries happening more than once;
- not wanting to be left by themselves or alone with particular people;
- being unusually lighthearted and insisting there's nothing wrong.

## **Appendix B. Safeguarding Helplines**

*If there is immediate risk or danger, contact the Police on 999.*

- NSPCC: 0808 800 5000
- Family Lives: 0808 800 2222
- National Domestic Abuse Helpline: 0808 2000 247
- Childline: 0800 1111
- Stop It Now: 0808 1000 900
- Respect Phonenumber: 0808 8024040
- NAPAC: 0808 801 0331
- National Careline: 0800 0699 784
- Samaritans: 116 123