

GLAMORGAN MUSIC SCHOOL

POLICIES AND PROCEDURES

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# PREVENTION OF BULLYING AND HARASSMENT AT WORK

## ***Statement of Policy***

Glamorgan Music School is committed to encouraging and maintaining good employee relations within a working environment which fosters team working and encourages employees to give of their best. Everyone in the Company and those who have dealings with the Company has a responsibility to maintain good working relationships and not use words or deeds that may harm the wellbeing of others. In addition to the obligations placed upon both employers and employees by equality and human rights legislation, everyone has the right to be treated with consideration, fairness, dignity and respect. This contributes to a workplace environment in which individuals feel safe and can work effectively competently and confidently.

Glamorgan Music School policy applies to all staff working within the organisation and to all employees working off the premises. It extends to include non-permanent workers such as secondees, contractors, agency, temporary staff, consultants and any other workers. The policy, in addition, covers the behaviour of staff outside working hours which may impact upon work or working relationships.

The Company has a “zero tolerance” policy and will investigate vigorously any allegations of bullying or harassment, regardless of whether the matter has been raised formally or informally.

## ***Key Principles***

The Company will provide and sustain a safe working environment in which everyone is treated fairly and with respect. Those working or dealing with Glamorgan Music School must not encounter harassment, intimidation or victimisation on the basis of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background or any other personal characteristic.

Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with the principles set out in this policy. In addition, each person has a responsibility to report any instance of bullying or harassment which they witness or which comes to their attention. Employees have a responsibility to act as role models, pro-actively addressing instances of bullying and harassment. Managers should also make themselves aware of their responsibility.

Harassment may be defined as any conduct which is:

- unwanted by the recipient

- is considered objectionable
- causes humiliation, offence, distress or other detrimental effect.

Harassment may be an isolated occurrence or repetitive; it may occur against one or more individuals.

Harassment may be, but is not limited to:

- Physical contact – ranging from touching to serious assault, gestures, intimidation, aggressive behaviour.
- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language.
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-co-operation and exclusion or isolation from social activities.

Bullying is unlikely to be a single or isolated instance. It is usually, but not exclusively repeated and persistent behaviour which is offensive, abusive, intimidating, malicious or insulting. Bullying includes but is not limited to:

- Conduct which is intimidating, physically abusive or threatening
- Conduct that denigrates, ridicules or humiliates an individual, especially in front of colleagues
- Humiliating an individual in front of colleagues
- Picking on one person when there is a common problem
- Shouting at an individual to get things done
- Consistently undermining someone and their ability to do the job
- Setting unrealistic targets or excessive workloads
- “cyber bullying” i.e. bullying via e-mail or social media. (This should be borne in mind where employees are working remotely and are managed through online means. Care and sensitivity should be practised with regard to the choice of context and language).
- Setting an individual up to fail e.g. by giving inadequate instructions or unreasonable deadlines.

**Harassment and bullying may be summarised as any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that is the determinant as to whether harassment or bullying has occurred.**

Any employee who wishes to make a complaint of harassment or bullying is encouraged to first discuss matters informally with their line manager, provided that they feel able to do so. Should the issues not be resolved at this stage, or the employee feels unable to raise the issue informally, then a formal resolution should be sought.

When a complaint of harassment or bullying is brought to the attention of a manager at any level, whether informally or formally, prompt action must be taken to investigate the matter. Corrective action must be taken where appropriate and this may require an investigation under the Company's Disciplinary Procedure.

If it is considered that one of the parties concerned in a harassment or bullying case should be moved from their current workplace, then as a matter of principle the Company will normally remove the alleged perpetrator rather than the complainant. However, the final decision on who should be moved should reflect the particular circumstances of the case and advice from senior management. It should be noted and explained to those concerned that the moving of either party is not an implication of guilt or culpability and no detriment to either party will be construed as a consequence.

All matters relating to the investigation of complaints of harassment or bullying will be treated in strict confidence. Any breach of confidentiality in this regard may render those responsible liable to disciplinary actions. However, it will be necessary that any alleged perpetrator is made aware of the allegations against them and the name(s) of those making the allegations together with the name(s) of any witnesses.

No employee will be victimised or suffer detriment for making a complaint of harassment or bullying and no manager shall threaten either explicitly or implicitly that an employee's complaint will be used as the basis for decisions affecting that employee. Such conduct will be treated as a very serious disciplinary offence. Similarly, managers are required to act on any complaint of harassment or bullying. Failure to do so will be regarded as misconduct which if proven, will result in disciplinary action.

All complaints of harassment or bullying whether raised formally or informally must be notified by the recipient of the complaint to Caroline Venter (Head, Glamorgan Music School).

This policy and procedure will be reviewed periodically giving due consideration to any legislative changes.

## **APPENDIX 1**

### ***PROCEDURE***

#### **Informal Resolution**

Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to greater understanding and agreement that the behaviour will cease.

Complainants are therefore encouraged to try, if they feel able to do so, to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated. This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.

If the complainant feels unable to approach the alleged harasser, a work colleague, or Trade Union representative could be asked to speak to the alleged harasser on the complainant's behalf. A note should be made of the action taken and the matter notified to senior management.

An individual who is made aware that their behaviour is unacceptable should:

- Listen carefully to the complaints and the particular concerns raised;
- Respect the other person's point of view; everyone has a right to work in an environment free from harassment/intimidation;
- Understand and acknowledge that it is the other person's reaction/perception to another's behaviour that is important;
- Agree the aspects of behaviour that will change;
- Review their general conduct/behaviour at work and with workplace colleagues.

#### **Formal Resolution**

If the alleged harassment continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally.

Normally, details of the complaint should be submitted in writing to the employee's line manager. However, if the employee feels unable to do this they should submit the complaint in writing to a more senior manager within their Department or Directorate. In exceptional circumstances, allegations may be raised directly with the relevant senior manager / Director, who will with other appropriate senior managers, arrange for the matter to be progressed in accordance with this policy and procedure.

When dealing with a complaint of harassment under the Formal Resolution Procedure, the relevant manager should:

- Take full details of the incidents in writing from the complainant and their representative (if appropriate);
- Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
- Inform the alleged harasser of the complaints against him/her, advise the alleged harasser to seek representation and invite him/her to a meeting in order that they can comment on the allegations against them.
- Keep all parties informed of expected timescales.
- Inform all parties in writing of the outcome and any action that may be required.

If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation (in accordance with established disciplinary procedure) or transferred temporarily pending the outcome of the inquiry to another Department.

Should there be a case to answer against the alleged harasser, the manager who has dealt with the complaint will communicate this to an impartial manager who will conduct a separate disciplinary investigation. The normal disciplinary procedure for misconduct/gross misconduct should then be followed. However, the following points should be taken into account:

- The complainant will normally be required to attend the disciplinary hearing as a witness, unless there are exceptional circumstances which prevent them from doing so;
- If the complainant is required to attend, they are entitled to be accompanied by either a Trade Union representative or work colleague and have any questions directed through that person.

If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:

- Dismissal
- A formal warning
- A recommendation of redeployment of the harasser, either on a temporary or a permanent basis. This will not be on any less favourable terms and conditions of employment.
- Implementation of other sanctions as detailed in the Company's Disciplinary Policy.
- Making arrangements for both parties to work as separately as possible within the same workplace.

In addition to the above, the harasser may be required to attend any training courses as deemed necessary by the Company.

It should also be noted that the complainant may wish to move department/section depending upon the nature of the complaint and the people involved. Appropriate consideration should be given to this request and the outcome with reasons provided to the complainant.

With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence demonstrates that the allegation has been made frivolously, maliciously, or for personal gain, then the individual making the complaint will be subject to Disciplinary proceedings as outlined in the Company's Disciplinary Policy.

## **Appeals**

Appeals against decisions taken under the Prevention of Bullying and Harassment at Work Policy and Procedure shall be dealt with as follows:-

- Appeals against a disciplinary sanction will be dealt with in accordance with the appeals process in the Disciplinary Procedure.
- Appeals by a complainant about the outcome of any inquiry will be dealt with in accordance with the appeal process in the Grievance Policy.

## **Records**

Where the complaint is informal and resolved at this stage, no record will be kept on personal files.

Following formal investigation, where the complaint is not substantiated, no records will be retained.

Where a complaint is substantiated or partially substantiated but does not proceed to disciplinary, a letter confirming the outcome will be retained on the perpetrator's personal file and supporting documentation retained in a separate file for a period of 12 months.

Where the matter proceeds to a disciplinary hearing then the storage of records should be in accordance with the disciplinary procedure.

# ***Glamorgan Music School***

## ***Safeguarding***

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

#### ***Introduction***

In keeping with its vision and values, Glamorgan Music School (GMS) is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel. To help increase understanding, this Code of Conduct details GMS's expectations of employees in key areas.

#### Scope and purpose

This Code of Conduct applies to all contracted staff, international and local, employed by GMS. Adapted Codes of Conduct are applicable to volunteers, partners, contractors and suppliers.

The purpose of this Code of Conduct is to set out the conduct expected of GMS staff whilst under contract to the organisation, and forms part of all contracts of employment. The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

Whilst recognising that local laws and cultures differ considerably from one country to another, GMS is an International Non-Governmental Organisation, working with international bodies in the promotion and development of music projects, and therefore the Code of Conduct is developed from international and UN standards. GMS staff are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

#### Mission and values

Glamorgan Music School is dedicated to bringing accessible music provision to all ages and abilities within the South Wales (specifically focusing on the Cardiff and Vale of Glamorgan) area. This will be achieved with cooperation from international bodies, and at times, visiting musicians or dignitaries. We will promote musical coalitions and performance opportunities for all our service users. We will be respectful of cultural differences and the heritage of our service user's, whilst promoting Welsh language and culture using Welsh language songs and 'traditional music's' (see Welsh Language Policy). We will aim to provide



a nurturing and educational environment for students, regardless of age, ethnicity, gender, or sexual orientation.

## Code of Conduct Standards

As a Glamorgan Music School employee, I will:

**Uphold the integrity and reputation of GMS by ensuring that my professional and personal conduct is consistent with GMS's values and standards**

- I will treat all people fairly with respect and dignity
- When working in an international context or travelling internationally on behalf of GMS, I will be observant of all local laws and be sensitive to local customs
- I will seek to ensure that my conduct does not bring GMS into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed
- I will not work under the influence of alcohol or use, or be in possession of, illegal substances on GMS premises or accommodation

**Not engage in abusive or exploitative conduct**

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence
- I will not exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance
- I will not engage in sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics
- I will not engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking
- I will not physically assault a child or vulnerable adult
- I will not emotionally or psychologically abuse a child or vulnerable adult

**Ensure the safety, health and welfare of all GMS staff members and associated personnel (volunteers, partners, suppliers and contractors)**

- I will adhere to all legal and organisational health and safety requirements in force at my location of work
- I will comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines

- I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including partner organisations and communities with whom we work

**Be responsible for the use of information, assets and resources to which I have access by reason of my employment with GMS**

- I will ensure that I use GMS assets and resources entrusted to me in a responsible manner and will account for all money and property
- I will not use GMS IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism
- I will not use GMS IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

**Perform my duties and conduct my private life in a manner that avoids conflicts of interest**

- I will declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of GMS
- I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party
- I will not accept **significant** gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my employment with GMS

**Uphold confidentiality**

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so

## Complaints and reports

GMS staff are obligated to bring to the attention of the relevant manager any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code. GMS staff reporting concerns are protected by the Disclosure of Malpractice in the Workplace policy.

Staff members who have a complaint or concern relating to breach of the Code should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager, **Caroline Venter** (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior staff member such as **Kathryn Kuczynski**.

Staff members receiving reports or concerns are obliged to action or refer the report immediately as per the GMS Complaints Policy and procedures.

## Related policies

Complaints policy and procedures

Health and Safety in the Workplace policy

Disclosure of Malpractice in the Workplace policy

Safeguarding policy

Anti Bullying and Harassment policy

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# Glamorgan Music School

## Safeguarding Policy

### ***Purpose***

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Glamorgan Music School (GMS). This includes harm arising from:

- The conduct of staff or personnel associated with GMS
- The design and implementation of GMS programmes and activities

The policy lays out the commitments made by GMS and informs staff and associated personnel<sup>1</sup> of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under GMS Anti Bullying and Harassment Policy<sup>2</sup>
- Safeguarding concerns in the wider community not perpetrated by GMS or associated personnel

### ***What is safeguarding?***

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect<sup>3</sup>

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

### ***Scope***

- All staff contracted by GMS
- Associated personnel whilst engaged with work or visits related to GMS, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

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<sup>1</sup> See 'Scope' for definition of associated personnel

<sup>2</sup> Some NGOs are now including workplace bullying and harassment in their safeguarding portfolio, as it relates to harm caused by coming into contact with our staff or programmes. However accompanying procedures for dealing with workplace bullying and harassment are likely to be different, due to legal and statutory differences in handling workplace incidents

<sup>3</sup> NHS 'What is Safeguarding? Easy Read' 2011

## ***Policy Statement***

GMS believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. GMS will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

GMS commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

## ***Prevention***

### **GMS responsibilities**

GMS will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with GMS. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

### **Staff responsibilities**

#### **Child safeguarding**

GMS staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

## **Adult safeguarding**

GMS staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

## **Protection from sexual exploitation and abuse**

GMS staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, GMS staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by GMS staff member or associated personnel to the appropriate staff member
- In the event of online tuition (e.g. during a global pandemic), lessons must be recorded and saved in a password protected file for 6 months, after which they will be deleted. The management can, at any time view files for the purposes of quality control and safeguarding monitoring. In the event of any safeguarding concerns being raised, files can and will be used for evidence in any investigations or actions taken.

## ***Enabling reports***

GMS will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by GMS Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

GMS will also accept complaints from external sources such as members of the public, partners and official bodies.

## **How to report a safeguarding concern**

Staff members who have a complaint or concern relating to safeguarding should report it immediately to a designated safeguarding officer. Either **Mrs Caroline Venter** or **Mrs Kathryn Kuczynski**. If the staff member does not feel comfortable reporting to either designated safeguarding officer (for example if they

feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior staff member.

**Caroline Venter**

**Kathryn Kuczynski**

**Chris Ackland (senior staff member)**

**All of the above can be contacted by emailing [glamorganmusicschool@gmail.com](mailto:glamorganmusicschool@gmail.com)**

## ***Response***

GMS will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligation.

GMS will apply appropriate disciplinary measures to staff found in breach of policy.

GMS will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

## ***Confidentiality***

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

## **Associated policies**

Code of Conduct

Dealing with Safeguarding Reports

Anti Bullying and Harassment policy

Disclosure of Malpractice in the Workplace (Whistleblower) policy

Complaints Policy

## ***Glossary of Terms***

### **Beneficiary of Assistance**

Someone who directly receives goods or services from [NGO]'s programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

### **Child**

A person below the age of 18

## **Harm**

Psychological, physical and any other infringement of an individual's rights

### **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

### **Protection from Sexual Exploitation and Abuse (PSEA)**

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

### **Safeguarding**

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect<sup>4</sup>

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

### **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **Sexual exploitation**

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

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<sup>4</sup> NHS 'What is Safeguarding? Easy Read' 2011



**Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

**At risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.

# Dealing with Safeguarding Reports

## Purpose and scope

The purpose of this document is to provide procedures for dealing with reports of breach of [NGO] Safeguarding Policy, where the safeguarding violation is:

- Against staff or members of the public,
- Perpetrated by staff, partners or associated personnel<sup>1</sup>.

<sup>1</sup>Associated personnel includes (but is not limited to) consultants, volunteers, contractors, programme visitors including journalists celebrities and politicians

## Procedures

### 1. Report is received

1.1 Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in their organisation.

1.2 If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the appropriate staff member (see below)

1.3 The person receiving the report should then document the following information, using an Incident Report Form if there is one:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

1.4 The person receiving the report should then forward this information to the Safeguarding Focal Point or appropriate staff member within 24 hours.

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1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

1.6 If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board (or other governance structure), or to an external statutory body. The staff member will be protected against any negative repercussions as a result of this report. See [NGO] Complaints Policy and Disclosure of Malpractice in the Workplace Policy.

## **2. Assess how to proceed with the report**

2.1 Appoint a Decision Maker for handling this report

2.2 Determine whether it is possible to take this report forward

- Does the reported incident(s) represent a breach of safeguarding policy?
- Is there sufficient information to follow up this report?

2.3 If the reported incident does not represent a breach of [NGO] Safeguarding Policy, but represents a safeguarding risk to others (such as a child safeguarding incident), the report should be referred through the appropriate channels (eg. local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future, and look at any wider lesson learning we can take forward.

2.5 If the report raises any concerns relating to children under the age of 18, **seek expert advice immediately**. If at any point in the process of responding to the report (for example during an investigation) it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should be immediately informed and should seek expert advice before proceeding.

2.6 If the decision is made to take the report forward, ensure that you have the relevant expertise and capacity to manage a safeguarding case. **If you do not have this expertise in-house, seek immediate assistance**, through external capacity if necessary.

2.7 Clarify what, how and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder – information needs may be different.

2.8 You may have separate policies depending on the type of concern the report relates to. For example workplace sexual harassment is dealt with through the [NGO]'s Anti Bullying and Harassment policy.

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If there isn't a policy for the type of report that has been made, follow these procedures.

2.9 Check your obligations on informing relevant bodies when you receive a safeguarding report.

These include (but are not limited to):

- • Funding organisations
- • Umbrella bodies/networks
- • Statutory bodies (such as the Charity Commission in the UK)

Some of these may require you to inform them when you receive a report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

### **3. Appoint roles and responsibilities for case management**

3.1 If not already done so (see above), appoint a Decision Maker for the case. The Decision Maker should be a senior staff member, not implicated or involved in the case in any way.

3.2 If the report alleges a serious safeguarding violation, you may wish to hold a case conference.

This should include:

- • Decision Maker
- • Person who received the report (such as the focal point, or manager)
- • HR manager
- • Safeguarding adviser (or equivalent) if there is one

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

### **4. Provide support to survivor where needed/requested**

4.1 Provide appropriate support to survivor(s) of safeguarding incidents. Nb. this should be provided as a duty of care even if the report has not yet been investigated. Support could include (but its not limited to)

- • Psychosocial care or counseling
- • Medical assistance
- • Protection or security assistance (for example being moved to a safe location)

4.2 All decision making on support should be led by the survivor.

### **5. Assess any protection or security risks to stakeholders**

5.1 For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case, and develop a mitigation plan if required.

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5.2 Continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

## **6. Decide on next steps**

6.1 The Decision Maker decides the next steps. These could be (but are not limited to)

- • No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit)
- • Investigation is required to gather further information
- • Immediate disciplinary action if no further information needed
- • Referral to relevant authorities

6.2 If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision making process will be different. Although associated personnel are not staff members, we have a duty of care to protect anyone who comes into contact with any aspect of our programme from harm. We cannot follow disciplinary processes with individuals outside our organisation, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff.

6.3 If an investigation is required and the organisation does not have internal capacity, identify resources to conduct the investigation. Determine which budget this will be covered by.

## **7. Manage investigation if required**

7.1 Refer to the organisation's procedures for investigating breaches of policy. If these do not cover safeguarding investigations, use external guidelines for investigating safeguarding reports, such as the CHS Alliance Guidelines for Investigations.

## **8. Make decision on outcome of investigation report**

8.1 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.

8.2 If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

## **9. Conclude the case**

9.1 Document all decisions made resulting from the case clearly and confidentially.

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..... Bond Safeguarding 5

9.2 Store all information relating to the case confidentially, and in accordance with [NGO] policy and local data protection law.

9.3 Record anonymised data relating to the case to feed into organisaitonal reporting requirements (eg. serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

## **Occupational / Workplace health and safety policy**

# ***What is an occupational health and safety (OH&S) policy?***

### ***Policy brief & purpose***

Our Occupational / Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees. Every employee has a right to feel safe at work. Our company is committed to follow legal standards and create a hazard-free workplace.

Our Occupational / Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees.

### ***Scope***

This Occupational / Workplace Health and Safety Policy applies to all prospective and current employees of the company as well as volunteers, contractors and consultants.

### ***Policy elements***

There are two aspects to consider when establishing an Occupational / Workplace Health and Safety Program: Preventative Action and Emergency Management.

#### **Preventative action**

Preventative action is any action we take to avoid injuries or illness related to workplace conditions.

We'll conduct periodical risk assessments and job hazard analysis to discover what is likely to harm employees. We'll establish preventative measures accordingly.

Potential threats and dangerous situations include but are not limited to:

- Performing tasks on heights, scaffolds, ladders and other unsteady structures
- Chemical substances (toxic, flammable etc.)
- Operating dangerous equipment
- Slippery or uneven surfaces
- Electrical infrastructure
- Noise/temperature
- Quality of air

We'll take the following preventative measures:

- When employees work in dangerous contexts or locations, we'll make sure there are safety precautions like safety nets and ropes.

- Inspectors and quality control employees will inspect equipment and infrastructure regularly (eg. PAT testing)
- We'll hold employee training sessions in health & safety standards and procedures such as manual handling.
- All highly dangerous job tasks require at least two employees to be present
- Employees who do repairs or cleaning need to put up caution signs
- We'll prohibit smoking indoors

Also, we'll enforce a substance abuse policy to protect employees from colleagues' misconduct.

## **Emergency Management**

Emergency management refers to our plan to deal with sudden catastrophes like fire, flood, earthquake or explosion. These depend on human error or natural forces.

Our emergency management involves the following provisions:

- Functional smoke alarms and sprinklers that are regularly inspected by the premises management of our workplace (schools, community centres etc).
- Fire extinguishers and other fire protection equipment that are easily accessible in our workplaces (e.g schools, community centres etc)
- An evacuation plan posted on the walls of our workplaces (schools, community centres etc)
- Fire escapes and safety exits that are clearly indicated and safe
- Fully-stocked first-aid kits at convenient locations

Schools will schedule fire drills and emergency evacuations periodically. They will monitor performance of health and safety procedures and will revise them to ensure higher level of protection. Please make sure you aware of the fire safety and evacuation procedures of the schools / venues that you work in.

## **Additional measures**

Our company will also keep abreast of changes and try to promote health & safety actively. We will:

- Update our policy according to changes in occupational health and safety legislation.
- Analyze incidents to discover what went wrong.
- Establish clear procedures for accident reporting.
- Revise work procedures to make them safer.

Our company will also consult experts or insurance representatives to ensure it complies with local and international standards. Accidents will be reported in the GMS accident book, located at 12 Main Street, Barry, Vale of Glamorgan, CF63 2HJ.

## ***Disciplinary Consequences***



Every team member is responsible for implementing this health and safety policy. Employees should follow health and safety instructions and will be held accountable when they don't. We'll take disciplinary action that may extend to termination when employees consistently disregard health and safety rules.

It's everyone's responsibility to contribute to a healthy and safe workplace.

# Glamorgan Music School Safeguarding

## Disclosure of Malpractice in the Workplace Policy

### ***Purpose***

At Glamorgan Music School (GMS), it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be **protected from victimisation and dismissal**.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

Malpractice includes (but is not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual abuse, harassment or exploitation (see GMS Safeguarding Policy)
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see GMS Safeguarding Policy as above)
- Breach of GMS policy
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or from suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

Malpractice is not a complaint about the performance and behaviour of a manager or other work colleague towards you.

If you genuinely believe that the actions of someone who works for GMS could lead to or has resulted in malpractice, please follow the procedure below.

Please note this procedure is not intended to replace GMS's Grievance Procedures, which continues to be the appropriate way to raise personal issues relating to the specific job or employment.

1. Raise the matter with your line manager **Caroline Venter**. If you feel you are unable to raise it with Caroline Venter, please raise it with **Kathryn Kuczynski**. Both can be contacted by emailing [glamorganmusicschool@gmail.com](mailto:glamorganmusicschool@gmail.com)

At the point of raising a concern it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm?
- What happened? If possible make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

All managers should:

- Report incidents of theft, fraud, or corruption immediately to GMS's Fraud and Corruption lead
- Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any GMS representative to GMS's Safeguarding lead
- Report any other incidents of malpractice in the workplace to your line manager.

2. A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate HR procedure.

3. When matters are reported regarding Fraud and Corruption, GMS's Fraud and Corruption policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

4. When matters are reported regarding Safeguarding, GMS's Safeguarding Investigation Guidelines will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

GMS will take appropriate action, which may end in dismissal, in accordance with the relevant procedure against any employee, volunteer or consultant who:

- Has been found to be victimising another individual for using this procedure, or deterring them from reporting genuine concerns under it.
- Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

### ***Frequently asked questions***

#### **What if the line manager is involved in the alleged malpractice in some way?**

If the line manager is involved in the alleged malpractice in some way, the matter should be raised with the next senior manager in the management line. Concerns regarding financial wrongdoing may be raised directly with the Fraud and Corruption regulating bodies and concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any GMS representative to the Safeguarding lead.

#### **Can the disclosure be made anonymously?**

You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the ability of investigators to pursue your concerns. Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed but lack of information may limit the nature, extent and outcome of the investigation.

#### **Who will conduct the investigation?**

Normally an independent person from within GMS will be appointed. On rare occasions, or for complex cases such as safeguarding, external investigation support may be sought.

#### **What if the matter involves a criminal offence?**

The issue may also be reported to the police if a criminal offence, such as fraud or theft, or sexual assault has been committed.

**What if the matter is a complaint about the performance or behaviour of a manager or colleague against me?**

Such complaints will be directed for action to the appropriate HR policy under unless the concerns relate to concerns of sexual misconduct or other forms of malpractice listed in this policy.

# Glamorgan Music School Safeguarding Complaints policy

## **Policy statement**

Receiving feedback and responding to complaints is an important part of improving Glamorgan Music School's (GMS) accountability. Ensuring our stakeholders can hold us to account will improve the quality of our work in all areas.

## **Scope**

This policy applies to GMS and is global in its application. A complaint can be made by any supporter, partner organisation, community or individual with whom we work, or any member of the public whether an individual, company or other entity, in the UK for anywhere else in the world.

## **Definitions**

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action, by GMS or its staff and associated personnel<sup>5</sup>. It is a criticism that expects a reply and would like things to be changed. Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery
- Concern from a member of the public or supporter about a particular fundraising approach or campaign action
- Concern about the behaviour of staff or associated personnel

A complaint must be about some action for which GMS is responsible or is within our sphere of influence.

A complaint is **not**:

- A general inquiry about GMS's work
- A request for information
- A contractual dispute
- A request to amend records e.g. to correct an address, cancel a donation
- A request to unsubscribe from a GMS service e.g. a campaign newsletter or email

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<sup>5</sup> Contractors, suppliers, volunteers etc.

The complaints procedures do not apply to complaints that are subject to current investigation by any regulatory body or other legal or official authorities in the UK or other countries in which we operate. Such issues will be dealt with by the relevant regulatory body.

### ***Procedures for making a complaint***

It is hoped that most complaints or concerns about GMS's work or behaviour can and will be dealt with informally by staff or volunteers at a local level. However, it is recognised that not all issues can be resolved in this way and that a formal complaints mechanism is required for those occasions when an individual or organisation wishes to make their complaint a matter of record and to receive a formal response.

### ***How to make a complaint***

All formal complaints should be made in writing either directly from the individual or organisation making the complaint or via someone acting on their behalf. See below for details about to whom to address a complaint.

### ***Who can make a complaint?***

This policy is global in application. A complaint can be made by:

- Any supporter
- Partner organisation
- Community or individual with whom we work
- Any member of the public whether an individual, company or other entity in the UK or around the world.

### ***Who is not covered by this policy?***

Complaints by staff are governed by GMS's procedures for dealing with problems in the workplace, and Anti Bullying and Harassment policy. Complaints relating to serious incidents such as fraud and corruption or safeguarding concerns will be dealt with through the relevant policy and procedures.

### ***How to make a complaint***

Complaints can be submitted in writing to:

Glamorgan Music School

c/o 12 Main Street,

Barry,

Vale of Glamorgan,

CF63 2HJ

Or in email to: [glamorganmusicschool@gmail.com](mailto:glamorganmusicschool@gmail.com)

