

EMERGENCY NUMBERS

City Children's Social Care Team	020 7332 3621
City Social Care Adult Services	0207 332 1224
Out of hours Adult Social Care	020 8356 2579
Out of hours Children's Social Care:	
Hackney Emergency Duty Team	020 8356 2710
City Police Prevent Team	prevent@cityoflondon.police.uk
	0207 601 2442
National Prevent Advice Line	0800 011 3764

Guildhall School Head of Safeguarding:

Hetsie van Rooyen

Safeguarding Helpline: 074 739 612 79

Email: hetsie.vanrooyen@gsmd.ac.uk

City of London Local Authority Designated Officer:

Name: Laura Demetriades

Email: Laura.Demetriades@cityoflondon.gov.uk

Phone: 020 7332 1215

NSPCC HELPLINE: 0808 800 5000

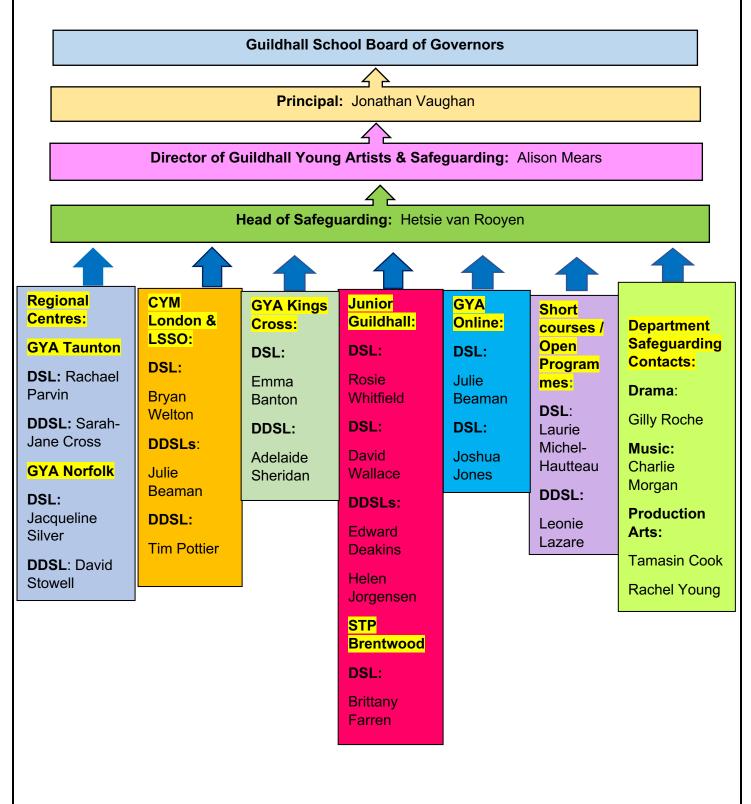
NSPCC Sexual Harassment & Abuse in Education Helpline: 0800 136 663

Victim Support Helpline: 0808 1689111

For advice and support regarding Domestic Abuse / Sexual Harassment / Hate Crime

Email: COI.VVA@victimsupport.org.uk

GUILDHALL SCHOOL SAFEGUARDING & PREVENT REPORTING CHART



DSL = Designated Safeguarding Lead DDSL = Deputy Designated Safeguarding Lead

Guildhall School of Music & Drama

Safeguarding Policy, September 2023

1. <u>The purpose and scope of this policy</u>

This policy details Guildhall School's safeguarding ethos and actions to promote the protection of children and adults. It applies to anyone working on behalf of Guildhall School of Music & Drama including:

Guildhall School Board of Governors, Senior Managers, Board of Trustees, Paid staff, Volunteers, Sessional workers, Freelance staff, Agency staff, All students (under 18 and adults), 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 (under 18 years old) and adults as part of its activities.

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:

- Domestic Abuse Act, 2021
- Keeping Children Safe in Education (Statutory guidance for schools and colleges) September 2023;
- Revised Prevent duty guidance: for England and Wales, April 2021
- Children Act 1989 and 2004,
- London Child Protection Procedures, 7th Edition 2022
- Safeguarding Vulnerable Groups Act 2006;
- Working Together to Safeguard Children 2018;
- The Care Act, 2014 (Adult Safeguarding)
- Data Protection Act 2018 & the UK General Data Protection Regulation.
- Safeguarding Adults Policy and Procedure, March 2021 (saferlondon.org.uk)

3. Other relevant policies and procedures:

This policy should be read alongside Guildhall School and the City of London's organisational policies and procedures which can be found on the Guildhall School website, My Guildhall intranet and on the City of London website. These policies include but are not limited to:

- Safer Recruitment policy (City of London)
- Whistleblowing policy (City of London)
- Code of Conduct: Staff and students
- Bullying and Harassment Policy
- Staff / Student Relationship policy
- Student policy on Harassment, Bullying and Sexual Misconduct 2023
- Report and Support page (My Guildhall)
- How to Report a Concern / Safeguarding page (My Guildhall)
- External hire of school premises
- Online Teaching Safeguarding guidance for adults and under 18's
- Tackling Violence against Women and Girls, July 2021 (www.gov.uk)
- Care Leavers and Looked After Children Policy
- Equality, Diversity and Inclusion

- Guildhall School Student Social Media Policy 2022
- Policy for the admission of students under 18 years of age to the Senior School
- Maintaining Good Campus Relations (including Prevent) 2021

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. We recruit staff and volunteers safely, ensuring all necessary pre-appointment checks are made.

Guildhall School is also committed to diversity, equality and creating a safe space for students and staff. We have a zero-tolerance policy for bullying, sexual harmful behaviour, racism and/or any form of discriminating behaviour. We review processes regularly to ensure that we have effective complaints and whistleblowing measures in place. Recording and storage of information is in line with Data Protection requirements.

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

Please see Appendix 3 for Safeguarding Adult definitions and abuse categories and more details for all Under 18 safeguarding topics.

5.1 Guildhall School Safeguarding Leads and Department Safeguarding Contacts

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 Executive 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 and offering direct support. The Head of Safeguarding oversees all Designated Safeguarding Leads and direct interface with students, parents, staff and external agencies. This role is line managed by the Director of Guildhall Young Artists and Safeguarding.

Each department has an identified Designated Safeguarding Lead (DSL) or a Department Safeguarding Contact (DSC) who will be responsible for safeguarding in their area. Each DSL will brief their departments on relevant safeguarding matters including training requirements. The DSL and DSC reports 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 & Safeguarding be absent please contact your area's Designated Safeguarding Lead or Department Safeguarding Contact.

5.2 Process for reporting a Safeguarding or Prevent related concern (relevant for online & inperson concerns):

Any incidents / disclosures / suspicions of safeguarding concerns should **immediately** be referred to the DSL who will alert the Head of Safeguarding **on the day the incident occurs, or the disclosure is made.** Should the concern arise outside of office hours the matter should be reported the next working day or within 24 hours of the receiving the original concern / report. If the matter occurs outside of office hours and it is an emergency, there should never be a delay to contact Emergency services such as the police or social services.

The **Guildhall School Safeguarding Helpline** can be used to access safeguarding advice or to make a report.

The Head of Safeguarding may request a **Safeguarding Incident Form** (please see Appendix 2) to be completed by the DSL / DSC / Staff once ascertained that a matter meets remit for safeguarding. The Safeguarding Incident Form has to be emailed to the Head of Safeguarding within **24 hours** of the HoS requesting it.

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 safeguarding allegations against staff and volunteers the Head of Safeguarding will immediately 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.

6. Guildhall School's Prevent Duty:

The Prevent duty aims to safeguard people from becoming radicalised, terrorists or supporting terrorism.

To comply with the Prevent duty, Guildhall School must:

- assess the risks associated with Prevent and draw up a plan to mitigate these
- have effective welfare support systems, linking to DfE Prevent coordinators, local authorities or the police if necessary
- have systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech
- arrange ongoing Prevent training for relevant staff
- have an IT usage policy, and where appropriate a research policy, which cover the Prevent duty
- engage with students and ensure that students' unions and societies are aware of policies concerning activities on campus.

Concerns about a student, member of staff or visitor possibly being radicalised, and any other risks associated with Prevent should immediately be referred to the Head of Safeguarding or in their absence to the Director of Guildhall Young Artists and Safeguarding as per the reporting process in Point 5.2.

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).

7. 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 follow recruitment procedures that help deter, reject or identify people who might abuse children or adults at risk. Guildhall School will 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. Guildhall School will consider online searches as part of our due diligence checks on shortlisted candidates.

8. Managing Allegations against professionals and volunteers

In line with this Safeguarding Policy, Guildhall School expects all staff, freelancers, visiting artists, volunteers et al to follow professional boundaries and safe conduct when working with our students. Any conduct that is not in line with these expectations will be risk assessed and action taken where necessary to promote the safety and well-being of our students. Our **Safeguarding Statement** on contracts ensures that all who engage with Guildhall School are reminded of our safeguarding culture, ethos and reporting pathways.

We take current or non-recent safeguarding concerns / complaints regarding Guildhall School staff / volunteers / freelancers seriously. Procedures for managing such safeguarding allegations should be followed as per national statutory guidance and internal policies such as the Handling Historical Complaints Policy. We encourage staff to report concerns either via the safeguarding procedure contained in this document or using the City of London Whistleblowing procedures.

If you have a safeguarding concern regarding a staff member (full time / part-time / deputy / freelance staff / visiting artist) or a volunteer, please report this immediately to the Director of GYA & Safeguarding and to the Head of Safeguarding. All safeguarding reports regarding staff / volunteers need to be collated by the Head of Safeguarding – therefore it is imperative that staff who have received such a concern will alert the Head of Safeguarding on the same day of receiving the concern. Non-recent abuse concerns will be reported in the same way.

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 09 October 2023

Date of next revision: September 2024

HVR/AM September 2023

Appendices

Appendix 1

Key staff contact details

Director of Guildhall Young Artists & Safeguarding

Name: Alison Mears Phone: 0207 382 7160 Email: alison.mears@gsmd.ac.uk

<u>Head of Safeguarding</u> Name: Hetsie van Rooyen SAFEGUARDING HELPLINE: 074 739 612 79 Email: hetsie.vanrooyen@gsmd.ac.uk

Designated leads for safeguarding (DSLs)

i) Junior Guildhall
 DSL: Head of Junior Guildhall
 Rosie Whitfield
 Phone: 0207 382 7160
 Email: rosie.whitfield@gsmd.ac.uk

DSL: Head of Junior Music Courses

Name: David Wallace Phone: 0207 382 7160 Email: david.wallace@gsmd.ac.uk

 DDSL:
 Edward Deakins, Music Officer (edward.deakins@gsmd.ac.uk)

 DDSL:
 Helen Jorgensen, Acting Administrative Manager (helen.jorgensen@gsmd.ac.uk)

GYA Online: DSLs

Julie Beaman (julie.beaman@gsmd.ac.uk) and Joshua Jones (joshua.jones@gsmd.ac.uk)

DSL: STP Brentwood

Name: Brittany Farren

Phone: 020 7382 7160
Email: brittany.farren@gsmd.ac.uk
LADO SERVICES ESSEX: 03330 139 79
ii) CYM London

London CYM DSL:

Name: Bryan Welton Phone: 0207 928 3844 Email: bryan.welton@gsmd.ac.uk Name: Julie Beaman Phone: 0207 928 3844 Email: julie.beaman@gsmd.ac.uk LSSO & CYML: Tim Pottier Email: tim.pottier@gsmd.ac.uk LADO SERVICES LAMBETH: 020 7926 4679 or email LADO@lambeth.gov.uk

iii) GYA Regional Centres

Head of Regional Centres (Not a DSL)

Name: Nikki Shepperd Phone: 0208 819 9040 Email: nikki.shepperd@gsmd.ac.uk

Taunton GYA DSL:

Name: Rachael Parvin Phone: 07754217993 Email: rparvin@gsmd.ac.uk Deputy DSL Name: Sarah-Jane Cross Phone: 07754217993 Email: sarah-jane.cross@gmsd.ac.uk LADO SERVICES TAUNTON: Phone Somerset Direct on 0300 123 2224 for a referral

Norfolk GYA DSL:

Name: Jacqueline Silver Phone: 07786 122374. Email: jacqueline.silver@gsmd.ac.uk Deputy DSL: Name: David Stowell Phone: 07766 163576 Email: david.stowell@gsmd.ac.uk LADO SERVICES NORFOLK: 01603 223473 or email query to LADO@norfolk.gov.uk

DSL: Short courses / Open Programmes Manager: Name: Laurie Michel-Hutteau Phone: 0207 382 7191 Email: laurie.michel-hutteau@gsmd.ac.uk DDSL: Leonie Lazare (Production Manager) Email: leonie.lazare@gsmd.ac.uk Work mobile: +44(0)7 895214691

iv) <u>GYA King's Cross DSL</u>

Name: Emma Banton Email: emma.banton@gsmd.ac.uk Deputy DSL: Adelaide Sheridan (adelaide.sheridan@gsmd.ac.uk)

v) Department Safeguarding Contacts (DSCs):

Department Safeguarding Contacts for the Senior School:

Head of Interdisciplinary Practice, Drama: Gilly Roche (gilly.roche@gsmd.ac.uk)
Associate Head of Vocal Studies, Music: Charlie Morgan (charlie.morgan@gsmd.ac.uk)
Stage Management Assistant, Production Arts: Tamasin Cook (tamasin.cook@gsmd.ac.uk)
Head of Pathway (Costume), Production Arts: Rachel Young (rachel.young@gsmd.ac.uk)



Guildhall School of Music & Drama

Safeguarding and Prevent Incident & Disclosure Form

Please complete this form if you are approached by a Higher Education (HE, Open Programmes participant or Guildhall Young Artist (GYA) student with a disclosure that they are being or have been harmed or abused, if you suspect or are concerned that a student is subject to risk / neglect / abuse or harm or if you feel a student is at risk of being radicalised. **If a student is in immediate danger, please phone 999.** If a staff member behaved in a way that may indicate risk of harm to students, please use this form and report it immediately to the Head of Safeguarding and Director of GYA & Safeguarding.

Do not use this form for general complaints relating to staff, students, or services. See raising a concern page for further guidance at How to Raise a Concern - How to Raise a Concern (gsmd.ac.uk)

Date safeguarding concern was noticed / reported to you or disclosed:

Student at risk's full name:

Student's programme and year of study (Senior School):

Student ID (Senior School):

Date of birth (if under 18):

GYA area (i.e Junior Guildhall / Regional Centre name):

If the safeguarding concern is regarding a staff member / freelancer / visiting artist / volunteer, please give their full name and Department details:

1. Record the following in the student's own words:

- Date of the alleged incident:
- Details of the safeguarding concern: What exactly happened? Who was involved? Where did it happen? Online abuse?
- Any visible injuries observed? **Yes / No** (if yes, where are the injuries located and what does it look like?)
- Was it reported to anyone at the time (if non-recent)? To whom?
- Any other observations which will assist risk assessments?

[Where feelings are being expressed, i.e "they make me feel uncomfortable / unsafe" please ask the student to expand, or note the incident(s)that caused them to feel this way]

2. Is the student or others at immediate risk of harm? Yes / No (please provide reasons for your assessment)

3. Actions taken to date:

(eg What support has been offered / where has this been reported – eg Police, Student Affairs, Head of Department, Designated Safeguarding Lead, Head of Safeguarding, others)

- 4. Does the adult student wish to make a formal report to Registry or what actions / outcome would they like to see happen? If they have provided a reason why they don't wish to make a formal report, please expand.
- 5. Name and position of staff member reporting the concern:
- **6. Date form emailed** to the Designated Safeguarding Lead / Department Safeguarding Contact with a copy to the Head of Safeguarding:

Please:

- Check to make sure your report is clear and will be clear to a new reader in the future.
- Email this form on the same day to the relevant Designated Safeguarding Lead for your department 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 & Safeguarding.

DEFINITIONS OF ABUSE & SAFEGUARDING TOPICS

Senior School Safeguarding:

Senior School Remit for email alerts to the Head of Safeguarding:

Please note all these categories below involve both online and in-person concerns:

- Domestic Violence / abusive relationship disclosures (emotional / physical / financial / isolation from friends and family / controlling and coercive behaviour etc)
- Sexual Harassment
- Stalking
- Online harassment (sexual / bullying / radicalisation / revenge porn etc)
- Sexual violence
- Prevent related concerns (hate speech / radicalisation / threats to others involving race / ideology / political beliefs etc)
- Safeguarding concerns expressed involving our (current or past) establishment staff or freelancers, including alumni (i.e relationships between students and staff / abuse from staff / harassment online or in person / threats or intimidation / inappropriate behaviour towards students / lack of professional boundaries with students)
- Please note that a Senior School Student needs to be made aware that an alert is required to the Head of Safeguarding when the above is disclosed as per this policy requirements. This is to ensure protection and safeguarding considerations are in place for the student at Guildhall school or in their community. Such alerts also ensure we identify safeguarding themes within the School as part of developing a safeguarding culture of preventative work to address such themes.
- Senior School student engagement with the Head of Safeguarding is completely **voluntary** unless immediate danger is assessed. Even though a safeguarding alert to the HoS is made the student cannot be forced to engage with the safeguarding service. The HoS will record such views /decisions of non-engagement, but the offer of safeguarding support will remain open to the student throughout their time at Guildhall. They can access this service at any time without judgement of past non-engagement.
- Mental Health concerns for Senior School Students (anxiety / suicidal ideation / self-harm risks etc) has to be referred to **Student Affairs** for counselling support. It is not an automatic Safeguarding alert but can involve the Head of Safeguarding if Student Affairs risk assess safeguarding needs alongside mental health needs. Student Affairs will in such cases refer to the Head of Safeguarding for consultation.

General Adult Safeguarding

Definition of adult safeguarding: Safeguarding is defined as 'protecting an adult's right to live in safety, free from abuse and neglect.' (Care and Support statutory guidance, chapter 14ii). Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults.

Guildhall 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 themselves against the abuse or neglect or the risk of it.' (Care Act 2014, section 42)

Forms of Adult Abuse:

- **Physical abuse** including hitting, slapping, pushing, unnecessary restraint or misusing medications.
- **Domestic violence** including all types of abuse between family members or partners; so called 'honour' based violence.
- **Sexual abuse** including inappropriate touching, indecent exposure, rape, harassment or any sexual acts the adult has not consented to.
- **Psychological abuse** including emotional abuse, threats of harm, attempts to control, coercion, verbal abuse and bullying.
- 'Cuckooing' is a term used where criminals exploit vulnerable people by taking over their homes to deal drugs and commit other crimes
- Financial or material abuse including theft, fraud, coercion with regard to financial affairs
- **Modern slavery** including forced labour and human trafficking. (Modern Slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown Home Office)
- **Discriminatory abuse** harassment or slurs due to someone's race, gender, age, disability, sexual orientation, religion or gender identity.
- **Organisational abuse** including neglect and poor care practice within a care setting or in relation to care provided in one's own home.
- **Neglect and Acts of Omission** failure to act or ignoring medical, emotional or physical care needs.
- **Self-neglect** neglecting to care for your own health, hygiene or surroundings. This can include hoarding.

How we make safeguarding personal at Guildhall School:

The **Care Act 2014** reiterates the following six principles of safeguarding which inform the ways in which we work with students.

Six key principles underpin all adult safeguarding work:

- **Empowerment** People being supported and encouraged to make their own decisions and informed consent. "I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."
- **Prevention** It is better to take action before harm occurs. "I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."
- **Proportionality** The least intrusive response appropriate to the risk presented."I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."
- **Protection** Support and representation for those in greatest need. "I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."
- **Partnership** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. "I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."
- Accountability Accountability and transparency in delivering safeguarding. "I understand the role of everyone involved in my life and so do they."

Making Safeguarding Personal means our work with students should be person-led and outcomefocused. It engages the student in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.

Some students may express desired outcomes or wishes that are not possible, and this provides opportunities for frank discussions to establish what the next best option is within some broader boundaries and principles that they have stated. For other students their desired outcomes may not be possible for instance if they don't want the police involved but the person who has abused or neglected them is in a position to do the same to others. Again there will be opportunities to explain this honestly and to find ways to most closely meet student wishes.

Please also note the **Mental Capacity Act (MCA**) which is designed to protect and empower people who may lack the mental capacity to make their own decisions about their care and treatment. It applies to people aged 16 and over. It covers decisions about day-to-day things like what to wear or what to buy for the weekly shop, or serious life-changing decisions like whether to move into a care home or have major surgery. More information available here: <u>Mental Capacity Act: making decisions - GOV.UK (www.gov.uk)</u>

The **Safeguarding Adults Policy and Procedure** is part of our safeguarding practice. This policy draws on the London multiagency adult safeguarding policy & procedures which is built on strong multi-agency partnerships working together with adults to prevent abuse and neglect where possible, and to provide a consistent approach when responding to safeguarding concerns. This entails joint accountability for the management of risk, timely information sharing, cooperation and an interconnected approach that respects boundaries and confidentiality within legal frameworks. For more information please access the policy here: <u>Safeguarding-Adults-Policy-and-Procedure-v.3-March-2021-002.pdf (saferlondon.org.uk)</u>

Safeguarding information for Under 18's:

What all staff need to look out for when working with Under 18's:

Guildhall School / GYA staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- LGBTQ+ related concerns;
- has been a victim of discrimination / racism / harassment;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage;
- is a privately fostered child; and
- is persistently absent from education.

Areas of concern:

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 as far 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 mental health, 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.

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 caregivers);
- 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**. 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.

Definition of Domestic Violence and Abuse:

"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."

Contextual Safeguarding 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: "*Multi-agency statutory guidance on female genital mutilation, 2020*".

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.

Sexual violence and sexual harassment between children / peer on peer abuse:

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 staff are supported and protected as appropriate.

Examples of peer-on-peer abuse:

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sharing self-generated indecent images (also known as sexting);
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- "upskirting", which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Racial and/or gender identity abuse / discrimination (this can be direct or indirect).
- Guildhall staff should also be alert to the fact that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as in day-to-day life. In many cases abuse will take place concurrently via online channels and in daily life.

The Safeguarding Culture at Guildhall School

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 online training in Safeguarding and Prevent as part of their induction. Staff will subsequently undertake **mandatory** safeguarding training **every three years**. Designated Safeguarding Leads (DSLs) require the following training every **two** years: DSL Training, Safer Recruitment Training, Safeguarding Training and Prevent Training.

Low Level Concerns

Low level concerns (i.e those that may not seem like clear safeguarding concerns) need to be reported to the DSL / HoS as per procedures set out in this policy. Such concerns will be confidentially discussed with the GYA Heads of centres / Senior School Department. Responses to low level concerns can be discussed in consultation with the Head of Safeguarding. Low level concerns which are shared about supply staff and contractors should be notified to their employers; and Guildhall School will consult with the LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

Risk assessments of School activities not on School premises (under 18)

Please also see additional Junior Guildhall Guidance which provides more detail regarding protocol for arranging off-site lessons.

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 and this Safeguarding 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.

Mental Health for Students and Staff

All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these students' experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken by talking to the Designated Safeguarding Lead and/or the Head of Safeguarding.

All staff have to report disclosures or observations of self-harm and/or suicide ideation immediately to the DSL / HoS. This includes the student expressing risk of harm to others.

The importance of the Equality Act 2010 in safeguarding. Guildhall school will:

- not unlawfully discriminate against students because of their protected characteristics
- consider how we are supporting students with protected characteristics

• take positive action, where proportionate, to deal with the disadvantages these students face. This includes a need to be conscious that students with protected characteristics may be more at risk of harm.

Guildhall School strive to provide LGBTQ+ students with a safe space for them to speak out or share their concerns with members of staff / DSLs / HoS.

Online safety

- Guildhall School will regularly review the effectiveness of school filters and monitoring systems.
- We will ensure that the leadership team and relevant staff are: aware of and understand the systems in place manage them effectively know how to escalate concerns when identified.
- GYA will use communications with parents and carers to reinforce the importance of children being safe online.

Managing Allegations against professionals and volunteers

This process should be used in respect of <u>all cases</u> in which it is alleged that a member of staff (including freelancers / visiting artists / volunteers) has:

• behaved in a way that has harmed a student, or may have harmed a student;

· possibly committed a criminal offence against or related to a student; or

• behaved towards a student in a way that indicates they may pose a risk of harm to students.

Please note that though the above definition is as per statutory guidance for children (Keeping Children Safe in Education, 2023) Guildhall school includes adults at risk in identifying allegations against staff.

In the first instance, the Director of GYA & Safeguarding and/or Head of Safeguarding should immediately 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 students 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 against Staff. A decision will be made to contact the LADO immediately on the day that an allegation is made if relevant for Under 18's students. 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. Please make sure you report as soon as possible to the Head of

Safeguarding or Director of GYA & Safeguarding even if you are not sure whether the info you received is a concern / allegation that needs safeguarding attention.

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 workplace 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 will 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.

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 & 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 monthly Safeguarding Report to the Director of Guildhall Young Artists which is then presented to the Executive 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, ongoing training, record keeping and providing this data 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 undergo suitable DBS checks and safeguarding training.

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 never be left alone with under 18-year-old students.

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.

Teaching off campus

Though the Teaching Off Campus arrangements are currently under review by Guildhall School, it will still be vital for existing safeguarding measures to be clarified as per this policy document and subsequent guidance which may arise from the review. Guildhall School acknowledges that not all 1:1 teaching can take place on campus and that some group teaching will also take place at external locations, including the studio/home of the staff members concerned. Guildhall School is committed to ensuring that identical standards of student care and safeguarding are in place at every teaching location, whether on- or off- the Guildhall School campus.

We expect all staff to follow the safeguarding principles set out in this document for <u>all</u> teaching (1:1 teaching, group teaching, off campus teaching etc). All professors / teaching staff, whether occasionally teaching at home or not, will have completed the online Safeguarding Young People (or other relevant safeguarding) training. Any conduct / behaviour not in line with our policies and procedures will be risk assessed and action taken where necessary noting that safeguarding considerations will be part of such assessments. Therefore, staff must, at all times, follow the guidance contained within the Code of Conduct policy and this Safeguarding Policy.

It is recognised that, occasionally, Music professors / teaching staff contracted by GYA or 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.

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.

It is noted that any adult 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 not receive 1-1 lessons off campus unless special arrangements are put in place.

For under 18's if the lesson has to take place in a teacher's or student's house **the parent/carer must sit in as per Risk Assessments**. Parents are asked to sign a document acknowledging this.

*Please note that some departments 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 / other professionals working with Guildhall School / GYA students

- Act in a professional manner at all times by following the Staff Code of Conduct, this Safeguarding Policy and other relevant school policies.
- Understand expectations to declare relationships and the School's position on safe working with students, as per the Staff / Student Relationship Policy.
- o Dress appropriately, showing respect for pupils and members of the community;
- Be vigilant Maintain an attitude of "it could happen here".

- Never share confidential or sensitive information about a student or their family with others unless within a safeguarding context to the designated safeguarding leads.
- Do not take any photos / videos of children: This cannot be done without the expressed consent from parents as per the Photo Permission Forms Guildhall School / GYA uses. Sharing photos and videos of students on your personal phone and/or online social media platforms is not allowed.
- Do not make suggestive or inappropriate remarks to or about a student, even in fun, as this could be misinterpreted. Inappropriate remarks include innuendo, swearing, and discussing their or your own intimate relationships.
- It is not permitted for you to email GYA / Under 18 students from your personal email address. Email communication with students is only allowed via your official school email address and <u>always</u> copy the parent/named carer for the student into your email.
- When working with students / participants under the age of 18 please do not provide students with your personal mobile number. Communication with Under 18-year-old students / participants via text messages / personal phone or video calls, any social media platform (WhatsApp / Instagram / Snapchat etc) or gaming platforms is not permitted. Video calls are only allowed via the approved apps used by Guildhall School and only for the purposes of Guildhall School teaching.
- **HR guidance on staff communication** (including safe communication to adult students) will come into effect in 2023/2024. *Please ensure that you are familiar with the School's expectations in this regard.*
- Do not engage in behaviour which could be construed as 'grooming' a student (for example giving a student money, presents, favours)
- 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 students alone in a car on journeys, however short.
- All adults who work with students are potentially at risk from accusations of abuse or inappropriate behaviour. Therefore, all staff / professionals are advised to exercise commonsense 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.
- 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 need to touch a student as part of a specific technique demonstration during a 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.
- 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.

Safeguarding recommendations for managing Student Disclosures:

• 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.

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. It also highlights Prevent related issues which needs to be considered in this process.

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

