

**Sage Gateshead**

# **Safeguarding Procedures**

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## 1. Introduction

These Procedures relate to Sage Gateshead's Safeguarding Policy and Safeguarding Code of Conduct. Note: The glossary of terms is within the Safeguarding Policy.

### 1.1. The Five R's

A simple way to think about the Procedures is to use the 5Rs:

- **Recognise** that a child or adult at risk is being harmed or is at risk of harm
- **Respond** appropriately to someone who is telling you what is happening to them
- **Report** the concerns to a Designated Safeguarding Officer (DSO) who will decide what action to take next
- **Record** the concerns and all other actions
- **Resolution** by a DSO of the referral, follow up referrals made to other agencies and possible escalation if concerns remain.

### 1.2. How Safeguarding Concerns may arise at Sage Gateshead

A concern might arise because:

- a child or adult at risk says that they are being abused or speaks of a harmful experience;
- you notice signs of abuse or neglect;
- somebody else says child or adult is being harmed or is at risk of harm;
- the behaviour of an adult (e.g. employees or volunteer or contractor) towards a child or adult at risk;
- the behaviour of children or adults towards each other;
- a child or adult says they were abused in the past – i.e. historical or non-recent abuse;
- a child, adult, parent or carer, employees or volunteer or contractor makes a complaint about someone's inappropriate behaviour.

1.3. The Procedures explain the steps that need to be taken by employees, freelancers, contractors and volunteers and the steps that the DSO will take. The Procedures are split into two sections: firstly, responding to safeguarding concerns about a child or adult and secondly responding to allegations against employees or volunteers or in other organisations we are working in. Flowcharts in Appendices 10 and 11 summarise the key steps so it might help to read those first for a basic outline of the Procedures.

1.4. To recognise the signs and indicators of child or adult abuse or neglect see Appendices 1 - 4.

## 2. Respond: what to do if you have a safeguarding concern about a child or adult

See **Appendix 10** for flowchart.

If anyone at Sage Gateshead identifies a safeguarding concern either in face to face contact, online contact, through social media or any other contact which is not immediately life-threatening or presents a high risk of serious harm, you must:

**Step 1** Contact a DSO to discuss your concern. This should be done on the same day you identify the concern.

**Step 2** Create a record of what was seen, said and done on the Safeguarding Report Form – see **Appendix 8**. If you have this form to hand then complete it otherwise the DSO will complete it when you speak with them. If you have completed the form then email it to [safeguarding@sagegateshead.com](mailto:safeguarding@sagegateshead.com) The blank form will be stored in SharePoint and volunteers will receive it by other means.

**Step 3** Seek support from your DSO if you feel you need support to do with the incident.

**Step 4** The DSO will then determine what action is necessary to protect the child or adult at risk. The options are:

- no action is required as it does not constitute a safeguarding concern;
- monitor the situation and arrange to speak with the person concerned again;
- speak to the adults in charge of the group if applicable (see 2.7 below);
- seek advice from one or more of the following: another DSO, the Safeguarding Director (SD), children's social care, adult social care, police, NSPCC Helpline, Professionals Online Safety Helpline, Ann Craft Trust (contact details are in **Appendix 7**);
- make a formal report (known as 'a referral') to children's social care or the adult social care and, in addition, the police should be notified if it is thought a crime has been committed;
- consider whether any additional support is required for the child or adult at risk and signpost them to sources of help.

**Step 5** The DSO must make a record of their decision with a rationale even if no further action is to be taken. A decision to take no further action or monitor a situation is as serious as a decision to make a referral out to the authorities.

**Step 6** The DSO must consider if consent is required in order to share information with the local authority and/or police. Any decision about consent should be recorded on the Safeguarding Action Log (**Appendix 9**). See section 4 for further detail on information sharing and consent.

**Step 7** If the DSO decides to make a report to children's social care or adult social care or the police then they must:

- Make a phone call and then put the notification in writing within 48 hours by using the relevant process in the local authority area which will be found on their website.
- Seek feedback after three working days of having made the notification to check it's been received and action taken and implications for the child or adult at risk.

**Step 8** The DSO must keep a record of all the actions taken (including phone calls and referrals out), any crime reference number, decisions made and any outcomes in accordance with good practice on recording, information storage and retention. Use the Safeguarding Action Log (**Appendix 9**).

**Step 9** DSOs will receive support from the Safeguarding Director (SD) and each other.

### **2.1. Responding to a direct disclosure of abuse or neglect**

Sometimes a child or adult at risk will tell somebody about their experience of abuse or the way they are being or have been treated. Respond in the following ways and then follow the steps outlined in **(2)**.

**Do**

- If possible, find an appropriate space to talk.
- Show you care, help them open up: give your full attention to the child or adult at risk and keep your body language open and encouraging;
- Be compassionate, be understanding and reassure them their feelings are important. Phrases such as ‘you’ve shown such courage today’ help;
- Take your time, slow down: respect pauses and don’t interrupt the child or adult – let them go at their own pace. Recognise and respond to their body language;
- Show you understand, make it clear you’re interested in what they are telling you;
- Reflect back what they’ve said to check your understanding;
- Reassure them that they’ve done the right thing in telling you;
- Explain what will happen next in terms of the process at Sage Gateshead;
- Make notes of your conversation and then follow the steps in 2.1.

**Do not:**

- React strongly – for instance saying, ‘that’s terrible;’
- Jump to conclusions especially about the alleged abuser;
- Tell them you can keep this a secret;
- Ask open questions;
- Make promises you cannot keep;
- Stop them from speaking freely;
- Tell them to stop talking so that you can get a DSO.

**2.2. Responding to a child or adult protection emergency**

In some circumstances, there may be immediate concerns about the safety of a child or adult at risk arising from the information disclosed to you either face to face or online, for example:

- A child or adult has taken steps to or expressed their intention to take their own life;
- Information that a child or adult at risk could be subject of further abuse if they go home;
- Information that a child or adult at risk has contact with a sex offender;
- Information that a child or adult at risk is being groomed into terrorism, sexual exploitation or criminal exploitation;
- A serious crime has been committed on the child or adult at risk.

In such circumstances, you should:

- Ring 999 and ask for the emergency service required - police and/or ambulance;
- Inform your DSO afterwards;
- If your DSO is not available then inform another DSO;
- The procedures in 2.1 must then be followed by the DSO;
- DSO to alert the family if known and appropriate to do so otherwise this is the responsibility of the social worker/police.

**2.3. Responding to a safeguarding concern outside of office hours**

If you are responding to a concern outside of office hours, you will need to get in touch with the emergency Duty Team of the Local Authority where the child or adult at risk lives.

<b>Gateshead Council Children’s Services</b>	Receives and investigates child protection concerns	0191 433 2653 (office hours) 0191 477 0844 (out of hours, at night, at weekends and bank holidays)
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<b>Gateshead Council LADO</b>	For making referrals about an allegation of abuse against member of employees, volunteer, freelancers etc.	0191 433354 <a href="mailto:Nicholasleon@gateshead.gov.uk">Nicholasleon@gateshead.gov.uk</a>
<b>Gateshead Council</b>	To raise a concern about a child	Office Hours: (0191) 433 2653 Out of hours: (0191) 477 0844
<b>Newcastle City Council</b>	To raise a concern about a child	Office Hours: (0191) 277 2500 Out of hours: (0191) 278 7878
<b>Sunderland City Council / Together for Children</b>	To raise a concern about a child	Office Hours: (0191) 561 7007 Out of hours: (0191) 520 5552
<b>Durham County Council</b>	To raise a concern about a child	24 hours: 03000 267 979
<b>Northumberland County Council</b>	To raise a concern about a child	24 hours: (01670) 536400
<b>NSPCC Helpline</b>	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
<b>Childline</b>	24-hour helpline for children and young people aged up to 19 years	0800 1111
<b>Professionals Online safety helpline (POSH)</b>	Advice for professionals about online safeguarding concerns	0344 381 4772 <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>
<b>Gateshead Adult Safeguarding</b>		Adult Social Care Direct 0191 433 7033 (24 hours a day, 7 days a week) If you have a safeguarding adult query you can speak to the Safeguarding Adults duty worker on 0191 433 2222. This number is for safeguarding queries only and not safeguarding referrals

#### 2.4. Response from children's social care or adult social care

Children's or adult social care will evaluate the concerns and risks involved to determine whether:

- the child or adult at risk needs immediate protection and urgent action is necessary; or
- the child or adult at risk is suffering, or at risk of suffering, significant harm and enquiries need to be made; and whether
- the child or adult at risk needs support services to promote their welfare/wellbeing

DSOs are expected to:

- Cooperate with children's or adult social care and the police

- Participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child or adult to plan the response to concerns
- Share any known information about the child or adult at risk for enquiries and assessments

## 2.5. Children or adults under supervision of a school/college/another organisation

If a safeguarding concern is identified in these circumstances, for example when a school party visits the Sage Gateshead building or when we are working in schools or colleges then the procedure is as follows:

**Step 1** You should notify either the person in charge of the party or class about the concern and ask that it be passed onto their Designated Safeguarding Lead/Officer.

**Step 2** You should make notes and notify your DSO of the concern and your actions on the same working day. Ideally make notes on the Safeguarding Report Form (**Appendix 8**) if you have access to it otherwise on a plain piece of paper/word document.

**Step 3** The DSO should follow up with the school's designated safeguarding lead or the organisation's own designated safeguarding officer to check they have received the concern and are taken appropriate action to address it. A record of the outcome should be made on the Safeguarding Report Form.

**Note:** If you are concerned about inappropriate behaviour of an employee in either the school, college or other organisation then do not share this with them. Rather notify a DSO who will refer to the procedures in section 3 for managing allegations against adults.

## 2.6. Responding to peer to peer abuse and bullying

- 2.7. Children can harm each other for example there is evidence of domestic abuse in teenage relationships, sexual exploitation, exploitation in a gang context and serious online bullying. These types of harmful behaviours would need to be reported as any other safeguarding concern onto a DSO.
- 2.8. Bullying of a less serious nature between children is prevalent and will need addressing if you identify it is happening. (See **Appendix 5** for types of bullying). This could involve speaking with the child who has been bullied and the child who is bullying. It may be necessary to involve the parents/carers but this will depend on the nature of the bullying, its seriousness, its impact on the victim and the attitude of the bully. Bystanders to the bullying may also need support.
- 2.9. If the child is part of an organised group or in a classroom setting then do not address the bullying behaviour yourself, rather speak with the person in charge of the party who is responsible for the group.
- 2.10. Bullying behaviour should not be passed off as "banter" or as "part of growing up". It is important to be conscious that a child who is engaging in bullying or abusive behaviour towards others may have been subject to abuse from other children or adults.

## Child or adult seems worried but unwilling to confide in employees

- 2.11. If a child or adult indicates they may be worried about abuse or other issues that are upsetting them but they are hesitant to discuss them, give them the contact details for agencies that can help such

as NSPCC Childline or The Mix (see **Appendix 8** for contact details). Make a record of having given such advice and inform a DSO.

### **The need for support services**

- 2.12. Where you think that a child or adult needs support services for their welfare or wellbeing respectively rather than a need for protection (e.g. someone needing support with their mental health), then speak to a DSO about what to do and possible avenues of support. Sage Gateshead would not make any direct referrals to other agencies rather they should help the child or adult at risk to do this themselves or with support of their family. Always record what action has been taken using the Safeguarding Report Form.

### **Non-recent/historic allegations of abuse.**

- 2.13. Any disclosure or concerns that relate to abuse that happened more than a year ago, whether involving anyone working at Sage Gateshead or outside of it, must be taken seriously and acted upon in line with the procedures outlined in Section 2.1 and Section 3. Often survivors of abuse take years to come forward due to shame and a fear of being disbelieved however, the alleged perpetrator may remain a risk to others and therefore all non-recent/ historic allegations should be examined by the authorities.

### **Additional vulnerabilities**

- 2.14. Some children and adults are particularly vulnerable to abuse. For example, research shows that those children and adults who are deaf, disabled or have special educational needs are more likely to experience abuse. Equally care-experienced children, or those that have already experienced harm, may be more vulnerable. For further details about abuse in specific circumstances and vulnerabilities see **Appendix 4**.

### **Bullying**

- 2.15. Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those being bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying (including bullying via the internet or mobile devices) can frequently be underestimated. It can cause considerable distress to children and adults at risk, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).
- 2.16. The extent and seriousness of the bullying will determine your response to it. Employees, workers, volunteers or freelancers should aim to address it as it arises and parents/carers may need to be spoken to. A record should be made with the relevant paperwork for the project or activity.

### **Safeguarding concerns about an employee, freelancer, volunteer or contractor**

- 2.17. Sage Gateshead recognises its duty of care towards its employees and understands that employees may, at times, require support because of their personal circumstances at home which put them at risk of harm for example if they are being subjected to domestic abuse, child to parent violence, so-called honour based violence including forced marriage, radicalisation/violent extremism or serious mental illness.

2.18. If an employee considers that they are at risk of harm or is very worried about a colleague being at risk of harm then they should either speak to their line manager or the Head of HR and Organisational Development or the Safeguarding Director.

2.19. The line manager and/or Head of HR and OD or the Safeguarding Director will speak with the employee about their situation and provide support and advice so that they can get the most appropriate help for their situation in order to ensure they are protected and their wellbeing is promoted. Please refer to the relevant HR for details of relevant support processes. HR will record any such conversations and advice given.

2.20. The line manager/HR will involve a DSO if they think that the employee is at risk of serious harm or death but is unwilling or unable to seek help for their own protection. Disclosing abuse to the appropriate emergency services may be made by Sage Gateshead without consent in the following exceptional circumstances:

- If it is believed the person is at risk of serious injury or death.
- If it is believed that there is a substantial risk of harm to any children involved in, or witnessing, the violence /abuse.

### **3. Respond and manage an allegation of abuse made against Sage Gateshead employees, volunteers, contractors**

See **Appendix II** for flowchart.

#### **Application**

3.1. The procedure applies to all employees, freelancers, volunteers and contractors (where Sage Gateshead is the primary employer/volunteering provider or has engaged the services of a freelancer contractor).

3.2. If Sage Gateshead is not the primary employer (e.g. agency employees or contractors) the Safeguarding Director will notify the primary employer about the allegation and they will be responsible for the case management of the allegation with support from a DSO and/or the SD.

3.3. Sage Gateshead recognises its duty of care to employees, freelancers, volunteers and contractors and will act to manage and minimise the stress inherent in the allegations process.

#### **Criteria for a safeguarding allegation**

3.4. The safeguarding allegations management procedure will be used in cases where it is alleged that an employee, freelancer, volunteer or contractor, has:

- Behaved in a way that has harmed a child/adult, or may have harmed a child/adult; or
- Possibly committed a criminal offence against or related to a child/adult; or
- Behaved towards a child/adult in a way that indicates that they would pose a risk of harm to other children and/or adults; or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/adults.

## Identifying an allegation

- 3.5. Allegations may arise in several ways, for example a report from a child or adult, a complaint from a parent/carer, or a concern raised by another child or adult. An allegation may concern someone's behaviour or actions within their job or a voluntary activity, or within their family or private life.

The concerns may be about any form of abuse or neglect. This will include concerns about inappropriate relationships between adults and children. For example:

- Aggression or physical assault;
- A sexual relationship between a child aged 16 or 17 years with an adult in a position of trust with them, even if the relationship may appear to be consensual;
- Grooming behaviour (see **Appendix 4**) with the intent to sexually exploit someone;
- Non-recent or historical allegation of abuse;
- Other behaviour that gives rise to concerns, such as possession of abusive images of children or inappropriate contact through texts or social media, gift giving or socialising with children or adults outside of work-related activity;
- Concern about a colleague's posts on their personal social networks;
- Serious or repeated breaches of the Sage Gateshead Safeguarding **Code of Conduct**.

- 3.6. If Sage Gateshead are notified about an allegation or concern about an employee, freelancer, volunteer or contractor outside of their work, then this may present a risk to children or adults for whom the employee is responsible and the general principles outlined in these procedures will therefore apply.

## Initial action by the person noticing concerns or receiving an allegation first

### 3.7. You should:

- Treat the matter seriously and keep an open mind;
- Do not make assumptions or offer alternative explanations;
- Do not investigate or ask leading questions, if seeking clarification;
- Do not promise confidentiality but give assurance that the information will only be shared on a need-to-know basis;
- Make a written record of the information on the Safeguarding Report Form (**Appendix 8**). Where possible, record the exact words of the person making the allegation. Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed;
- Immediately report the matter to a DSO in the same working day. In their absence, or if a DSO is the subject of the allegation, concerns must be reported to another DSO or the Safeguarding Director (SD).

- 3.8. The DSO should notify the SD and the relevant senior manager unless the matter is clearly not a safeguarding allegation and has another explanation. A record of all decision making must be kept on the Action Log (**Appendix 9**).

- 3.9. The SD will manage the allegations process in conjunction with the relevant DSO and senior manager.

Arrangements for managing an allegation will vary in the following circumstances if the allegation is made against:

- **DSO** - the SD, another DSO and relevant senior manager will manage the allegation process;
- **SD** - the Managing Director and Chief Operating Officer will manage the allegation;
- **Managing Director** – a board member and the SD.

### 3.10. Initial response to a safeguarding allegation:

The SD and DSO should:

- Obtain written details of the concern or allegation by the person reporting it and date it. Record any decisions made and the rationale. Complete the Safeguarding Report Form (see **Appendix 8**) if it has not already been done;
- Contact the police if it is thought someone is in immediate danger;
- Decide if any further clarifying information is needed or advice from a relevant authority (see **Appendix 7** for contacts) but do not do an investigation;
- Decide if any work equipment (e.g. lap top or mobile phone) needs to be removed from the individual, as it might hold evidence of online abuse, or if access to Sage Gateshead channels must be suspended;

#### Contact:

- the Local Authority designated officer (LADO) immediately to report the allegation if it meets one or more of the criteria regarding a child as described in 3.2 or to consult with them if uncertain as to how to proceed; or,
- adult social care if the alleged victim is aged 18 years and above (as they do not have the LADO role) to report the allegation if it meets one or more of the criteria regarding an adult as described in 3.3 or to consult with them if uncertain as to how to proceed.
- If a potentially criminal offence has been committed then discuss this with the LADO and agree who will contact the police.
- Decide whether the criteria are met for a serious incident report to be made to the Charity Commission (see **Appendix 15** for guidance)
- If the allegation requires immediate attention but is received out of office hours, contact the local authority Emergency Duty Team or the police and then inform the LADO or adult social care as soon as possible thereafter.
- Refer allegations against any former employee, freelancer, volunteer or contractor to the LADO and discuss with them who will notify the police if it is agreed that a crime may have been committed.
- If the allegation does not meet the criteria described in 3.2 then consider if the matter is one of poor practice and needs to be addressed through other employment processes.

#### Further actions

### 3.11. Child victim of the allegation

- If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or likely to suffer significant harm, the LADO will refer the case to children's social care and ask them to convene a strategy meeting to share information and determine an action plan.
- If an investigation by children's social care or the police is deemed as not necessary after they have made further enquiries, then the SD, DSO and relevant senior manager and the LADO will discuss if any further actions are required internally. The options will depend on the nature of the allegation and the evidence available. This will range from taking no further action, training, disciplinary procedure or a decision not to use the person's services in the future.

- If the initial evaluation leads to no further action against the employee, freelancer, volunteer or contractor concerned, the decision and justification should be recorded. Agreement should be reached on what information should be put in writing to the individual who was subject to the allegation and what action should follow, including informing the person who made the allegation originally (but maintaining confidentiality about the full case details).

### **3.12. Adult victim of the allegation**

The same process applies as a child victim except it will not be initiated by a LADO rather it will be the responsibility of the adult social care safeguarding team.

### **3.13. Persons to be notified**

- After consultation with the LADO or adult social care, the SD should inform the accused person about the allegation as soon as possible.
- However, if a strategy discussion is needed, or the police or children's social care need to be involved, the SD should not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the individual.
- In principle, the SD should inform the child's parents/carers about the allegation. The LADO/adult social care should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents/carers may need to be informed right away, e.g. if a child is injured and needs medical attention.

The parents/carers and the child, if sufficiently mature (around secondary school aged), should be helped to understand the process and kept informed about the progress of the case and the outcome if no criminal prosecution will take place. Similarly, the adult at risk should be helped to understand the process too and their carers too if this is relevant.

## **Confidentiality**

3.14. Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information sharing should be restricted to those who need to know in order to protect the child or adults concerned, carry out the enquiries and manage the disciplinary process, if applicable

3.15. The DSO should inform the parents/carers/child or adult at risk concerned about the implications of publishing details of the allegation in any form of media or on social networking sites.

The SD should consider how best to manage speculation and press interest, if it arises.

## **Supporting people**

3.14 The SD together with children's social care/adult social care and the police, if they are involved, will consider the impact on the child or adult at risk concerned and provide support as appropriate. In some cases, there may be no known victim e.g. if the concern is about the distribution of obscene images of children.

### **3.15 The SD:**

- Will appoint a named representative to keep the employee, freelancer or volunteer updated on the progress of the investigation; this will continue during any investigation or disciplinary process.

- Ensure that the employee is provided with appropriate support, if necessary, through occupational health or their union or the employee assistance programme.

### **Managing risk during the investigation**

- 3.16. The perceived level of risk during the investigation needs to be considered and managed. In some situations, the level of risk may require the employee/volunteer/freelancer/contractor not to be working with children or adults.
- 3.17. Based on an assessment of risk, the SD and relevant senior manager will determine what action to take with regards to the employment/engagement of the person – whether it is appropriate to suspend them, cease to use their services or redeploy them into another role without child/adult at risk contact, provide another person to be present when the individual has contact with children or adults, whilst the investigation is carried out. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. The SD, DSO and LADO or adult social care may have views on this which need to be considered.
- 3.18. If immediate suspension or ceasing of services is considered necessary, the rationale and justification for such a course of action should be agreed and recorded within HR systems as well as the safeguarding file. This should also include what alternatives to suspension have been considered and why they were rejected.

Possible risks to the child or adult involved and any children in the accused's home, work or community life will be evaluated and managed by the LADO or adult social care and the police.

#### **3.19. Timescales**

- Cases will be resolved as quickly as possible, consistent with a thorough and fair investigation.
- It is expected that the investigations by the authorities in most cases should be resolved within one month and all but exceptional cases should be resolved within 12 months.
- However, the timing will depend on the nature, seriousness and complexity of the case and the right outcome is far more important than meeting timescales.
- Cases where it is immediately apparent that the allegation is unsubstantiated or malicious should be resolved within one week.
- Disciplinary action should normally not be taken until the outcome of any external investigation has been completed. The decision to take such action lies with Sage Gateshead.

#### **3.20. Resignations and compromise agreements**

- Every effort will be made to reach a conclusion to the case should the employee, freelancer, volunteer or contractor refuse to cooperate, having been given a full opportunity to answer the allegation and make representation.
- Although it would not be possible to apply disciplinary sanctions if the period of notice expires before the conclusion of the investigation, the outcome of any disciplinary process will be recorded.
- Sage Gateshead will not use 'compromise/settlement agreements' where there has been a safeguarding allegation, for example where the employee agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

#### **3.21. Outcomes of an investigations**

The following categories should be used in recording the outcome:

- **Substantiated** - there is sufficient evidence to prove the allegation
- **Malicious** - there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False** - there is sufficient evidence to disprove the allegation
- **Unsubstantiated** - there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded** - there is no evidence or proper basis which supports the allegation being made

### 3.22. Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to children's social care services to determine whether the child needs services, or may have been abused by someone else. Similarly, adult social care will consider this in terms of the adult who made such an allegation.

### 3.23. Disciplinary or suitability process and investigations

The SD and relevant senior manager will discuss whether disciplinary action or formal resolution is appropriate in cases where:

- It is clear at the outset, or decided by a strategy discussion, that a police investigation or social care enquiry is not necessary: or
- The police or the Crown Prosecution Service informs that the criminal investigation and subsequent trial is complete, or that an investigation is to be closed without charge, or prosecution is discontinued.

The discussion will consider any potential misconduct or gross misconduct by the employee, any concerning conduct or behaviour by the volunteer, and consider:

- The information provided by the police and children's or adult social care
- The result of any investigation or trial; and
- The different standards of proof in civil and criminal proceedings.

In the case of contractors or freelancers, the LADO/adult social care and SD will work with the providing agency where applicable in deciding whether to continue using the person's services.

### 3.24. Record keeping

- The SD or DSO will keep a clear and comprehensive summary of the case record and provide a copy to the employee, freelancer, volunteer or contractor.
- The record will include details of how the allegation was managed and resolved and the decisions reached.
- Details of allegations that are found to be malicious, false or unsubstantiated should be removed from personnel records but kept in the safeguarding record with a cross reference from the HR record to the safeguarding record. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

### 3.25. References

- If the allegation was proven to be malicious, false, or unsubstantiated, it will not be included in any employer reference.
- A history of repeated concerns or allegations which have all been found to be malicious, false, or unsubstantiated will also not be included in any references.

### **3.26. Action following the conclusion of the investigative process**

The options depend on the circumstances of the case and the result of any police investigation or trial, any investigations in respect of the child/adult victim as well as the different standard of proof required in civil and criminal proceedings. Options include:

- Reintegration of the employee
- Reinstate the services of the volunteer, freelancer or contractor
- Instigate the disciplinary process in respect of employees or resolution process in respect of volunteers
- Alert other known employers of the individual concerned (which is a responsibility of the LADO/adult social care to do if necessary)
- Make a referral to the Disclosure and Barring Service (DBS) for consideration to bar the person from working with children or adults. The legal duty to refer applies if Sage Gateshead removes an individual from working in regulated activity with children or adults and they pose a risk to children/adults due to:
  - relevant conduct
- risk of harm;
- receiving a criminal caution or conviction for a relevant offence;
- the person has resigned or left that post in circumstances where they may have been removed.

**Alert the Charity Commission of the outcome as per the serious incident reporting requirements (see Appendix 15) if applicable.**

### **3.27. Notifying the Registered Body or Regulator**

Where an individual is a registered practitioner with a professional body e.g. teacher or medical professional or social worker, then they may need to be notified - responsibility for this rests with the SD.

### **3.28. Learning lessons**

At the conclusion of a case in which an allegation is substantiated, the SD and DSO and relevant senior manager, in conjunction with the LADO or adult social care should review the circumstances of the case to determine whether any improvements could be made to Sage Gateshead's procedures or practice to help prevent similar incidents in future.

## **4. Safeguarding in the Online Environment**

### **4.1. Children**

Children can be subject to abuse online as well as offline. Abusive images of children or young people may be distributed via the internet. Such images should not be referred to as 'child pornography' rather, they are permanent records of children being sexually exploited and as such should be referred to as 'child sexual abuse images'.

## 4.2. Exposure to child sexual abuse images

If a member of employees, volunteer, freelancer or contractor is inadvertently exposed to child sexual abuse images of children whilst using the internet:

The URLs (webpage addresses) which contain the suspect images should be reported to the Internet Watch Foundation via [www.iwf.org.uk](http://www.iwf.org.uk). You should refer to the DSO who will carry out the report. Sage Gateshead must not send copies of the images to the Internet Watch Foundation. Any copies that exist of the image, for example in emails, should be deleted.

## 4.3. Abusive Images

What to do if abusive images of children are found on Sage Gateshead devices but it's not clear who was responsible for uploading them:

- You must report what you have seen to a DSO within 24 hours and if unavailable contact another DSO or the SD
- The URLs (webpage addresses) which contain the suspect images should be reported on to the Internet Watch Foundation via [www.iwf.org.uk](http://www.iwf.org.uk) by a DSO. You must not send copies of the images to the Internet Watch Foundation.
- The police should be informed by the DSO and the Safeguarding Concern Form (**Appendix 8**) completed.
- If any copies of images need to be stored at the request of the police, then they should be stored securely where no one else has access to them.
- All other copies must be deleted.
- DSO to discuss with the SD and police what further investigative action might be necessary and if necessary follow procedures in **Section 3**.

## 4.4. Sage Gateshead Devices

What to do if a member of employees/volunteer/contractor is found in possession of or sharing child sexual abuse images on any device:

- You must inform a DSO and if unavailable contact another DSO;
- DSO to contact the police regarding the images. If there is a doubt about whether the images are criminal, then a discussion will take place with the police regarding the best way for them to receive copies to determine whether they are criminal or not;
- DSO to agree with the police what to do about the device that the images are on;
- Quarantine the device in question and discuss with the police about checking for any other images on that device or any others;
- Instigate the management of allegations (Section 3) procedures.

## 4.5. Personal Devices

Any photographs or films of children/adults must be taken on Sage Gateshead's own devices and can only be posted on the Sage Gateshead's official channels. This will be made clear within all relevant contractual arrangements.

## 4.6. If a child/adult discloses that they are being groomed/abused/seriously bullied online:

Follow the procedures as outlined in Section 2 and this includes contacting the police. Advice can be sought and a report be made to CEOP (Child Exploitation and Online Protection Command) which is a specialist

police command dealing with inappropriate online behaviour. There is also an adviceline for professionals (POSH) dealing with online concerns. (see **Appendix 7** for contact details)

If the adult committing grooming is an employee, volunteer or contractor then the DSO should also follow the safeguarding allegations procedures too (see Section 3).

#### **4.7. Sexting and Indecent Image Sharing**

Making, possessing, and distributing any images (photos/film) of someone under 18 which is indecent is illegal. This includes imagery made by anyone under 18 years. Adults sending messages to a child of a sexual nature and/or grooming are also illegal. A safeguarding concern could therefore arise in respect of sexting and/or indecent image sharing. However, sexting and indecent image sharing can be a part of normal sexual development between a consenting couple and its only in some circumstances the matters would need a safeguarding response.

If an incident of sexting or indecent images sharing between children or between an adult and child comes to your attention then report it to a DSO within one working day and:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal;
- A screen shot of text messages could be taken for evidence but this must not include any images;
- If you have already viewed the imagery by accident (e.g. if a child has showed it to you before you could ask them not to), report this to the DSO (or equivalent);
- Explain to the child that you need to report it and reassure them that they will receive support and help from the DSO and this does not necessarily mean the police will get involved;
- Don't ask the child who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSO;
- Don't say or do anything to blame or shame any child involved.

See **Appendix 13** for the steps that DSOs should take. If the sexting incident has involved an employee, volunteer or contractor with a child then the DSO should also follow the management of allegation procedure in **Section 3**.

### **5. Information sharing, consent and confidentiality**

- 5.1. In general terms, people have a right to expect that their personal information is not shared with other organisations and that their consent is obtained before sharing.
- 5.2. Sage Gateshead has a duty to share information with other agencies to safeguard children and adults at risk in certain circumstances when it is in the public interest, i.e. when there is a concern about actual or possible abuse/neglect or if we believe a crime has been committed.

Whilst consent to share information should be sought where it is safe and appropriate to do so, information may be shared without consent if there is good reason to do so as it is lawful to share such information without consent for the purpose of safeguarding a child or adult.

Any information that is shared will only be shared on a need to know basis and these decisions will be made by a DSO and SD

You must never promise any adult at risk or child to keep information confidential when it is about Safeguarding concerns or allegations.

5.3. Government advice about when and how information in respect of children can be shared is laid out in 'seven golden rules':

- i. the General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about individuals is shared appropriately.
- ii. be open and honest with the individual (and/or their family) from the start about why, what, how and with whom information may be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- iii. seek advice from others including external agencies, if there is any doubt about sharing the information without disclosing the identity of the individual.
- iv. where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. You may share information without consent if you consider on the facts presented that there is a lawful basis such as where safety may be at risk.
- v. consider safety and well-being: base information sharing decisions on the safety and well-being of the individual and others who may be affected by their actions.
- vi. necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- vii. keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

5.4. Consent to share information is different for adults as they have a far greater say in what information can be shared about them and they are given more involvement, choice and control in such matters. Their ability to consent is dependent on whether they have the mental capacity to understand the risks of harm. Sage Gateshead employees are not expected to assess the issue of mental capacity but it is important that an adult is involved as far as possible in making decisions about their own safety and wellbeing.

## 6. Recording, record keeping, retention and destruction

### 6.1. Purpose

Record keeping is an essential part of good safeguarding practice. Records should be factual, accurate, relevant, up to date and auditable. Where opinions are included this must be made clear. Where people are referred to, they should be identified clearly by their name and role where relevant.

### 6.2. Storage

Safeguarding records will be held in the NMT drive with restricted access to the SD, DSOs and Head of HR and OD.

#### DSOs and the SD must:

- Record all consultations and decision-making regarding a safeguarding concern or allegation
- Create a stand-alone file if one does not exist.
- Continue to update the file, including running records on the Action Log

### 6.3. Checklist for a good safeguarding record:

- Clear, concise and precise;
- Writer's meaning clearly conveyed and writer's name is included;
- Includes all relevant information;
- Free from jargon and abbreviations;
- Separates fact from opinion and hearsay;
- Professional judgment supported by evidence;
- Decisions reached are clearly recorded;
- Dated and timed.

#### **6.4. Records retention and destruction schedule**

Sage Gateshead will keep child and adult safeguarding records for 10 years.

In the case of safeguarding allegations, a summary will be placed in the employee's personnel file, or the records relating to freelancers, volunteers or contractors kept until the person reaches retirement age or for a period of 10 years from the date of the allegation, if that is longer.

6.5. Responsibility for the destruction of records lies with Chief Operating Officer

### **7. Escalation**

7.1. Where Sage Gateshead has made a referral out to either the police or children or adult social care and has followed it up, if Sage Gateshead remain concerned that risks remain then this can be escalated. The DSO should discuss this with the SD and agree what steps to take. Options include:

- a formal letter to the local authority outlining the concerns, or
- in each local authority area, there is a Local Children's Safeguarding Partnership (formerly called Local Safeguarding Children Boards) who is responsible for writing interagency child protection procedures and the equivalent for adults is called the Adult Safeguarding Board. These procedures will explain how a matter can be escalated at Board level.

7.2. If any employee or volunteer or contractor considers that a DSO and SD have not taken appropriate action to address a concern or allegation raised, they should raise the matter with the Chief Operations Officer. If still dissatisfied there is the option of using the Sage Gateshead whistleblowing process.

7.3. The NSPCC offers a whistleblowing helpline to give advice when processes to whistle blow internally have not brought a satisfactory resolution or alternatively advice can be sought from Protect's Advice Line (see **Appendix 7** for contact details).

### **8. Safer working practices**

8.1. Everyone working with children and adults at risk should ensure they have read and abide by the Safeguarding Code of Conduct.

## **9. Safeguarding arrangements when Sage Gateshead works with partners, freelancers, with those that hire our premises**

### **9.1. Duty of Care**

Sage Gateshead's commitment to safeguarding children and adults at risk extends to the arrangements we have when working with contractors, suppliers, partners and external organisations including hirers. This should be reflected in any Contractual Agreements/Terms and Conditions as part of any hiring arrangements or partnership agreements.

### **9.2. Contractors and Suppliers:**

Prior to engaging with suppliers who work on behalf of Sage Gateshead, they will be provided with the Safeguarding Code of Conduct and a summary of the Safeguarding Procedures.

All contractors/suppliers will be required to confirm they have understood the Sage Gateshead Safeguarding Policy Statement, Safeguarding Code of Conduct and DSOs contact details and agree to adhere to them. This will be part of the contractual arrangement.

Support will be provided to contractors/suppliers if required by the relevant DSO.

### **9.3. Partners and external organisations:**

Sage Gateshead expect partners and external organisations to have their own safeguarding policies and procedures. As part of our due diligence, we will require all partners to complete **Appendix 12: Safeguarding Checklist for Partner Organisations** working with Sage Gateshead. Responsibility for ensuring this is done is the responsibility of the relevant manager or senior manager.

We will make clear that in the absence of a Safeguarding Policy or Safeguarding Procedure – or in the event of a dispute – Sage Gateshead's Safeguarding policy and procedures will take precedence.

We will work alongside partners with the aim of sharing best practice and ensuring effective safeguarding of all.

### **9.4. Customers/Clients**

Any group or individual who hires SG facilities will be provided with the organisation's Safeguarding Policy Statement and Code of Conduct. All hirers will be required to sign to say they will ensure that anyone using the facilities being hired will uphold Sage Gateshead's safeguarding ethos that makes the safeguarding of children and adults at risk everyone's responsibility.

All hirers will be provided with the relevant DSO's contact details and made aware that they can raise any safeguarding concerns to even if they have their own safeguarding procedures. This requirement will be integrated into hirers booking form.

### **9.5. Working with partners**

Sage Gateshead works in partnership with other organisations both onsite and offsite. When this happens, it is essential that there is a written agreement about the safeguarding arrangements between us and our partner(s) which details:

- Which partner is taking primary responsibility for responding to any safeguarding concerns or allegations;
- The name and contact details for the designated safeguarding officer in the partner organisation and at Sage Gateshead;
- Who conducts the risk assessment(s) for the activity/project and implements the controls necessary to make it safe;
- Any additional elements regarding the Safeguarding Code of Conduct because of the specific nature of the activity/project;
- Responsibility for getting consent to participate in the activity/project and for the use of images if applicable;
- Information sharing and storage of confidential data e.g. registration forms and medical information
- Any safeguarding training requirements;
- Arrangements for monitoring safeguarding practice for the duration of the partnership arrangement;
- Arrangements for ensuring employees, volunteers or freelancers are suitable, appropriately qualified and safe to work with children/young person.

The Programme Manager (or equivalent) is responsible for ensuring the partnership arrangement is in place.

## Hirers

9.6. We expect hirers who are involving children and or adults at risk in their activities to meet our safeguarding requirements and these will be included in the hirer's contract. Hirers are expected to:

- Have a safeguarding policy and procedures and code of conduct or agree to adhere to ours
- Ensure their employees or volunteers are suitable to work with children and that they hold the requisite qualification related to the activity that they are delivering in our premises where this is necessary
- Provide us with a risk assessment of their activities at our site
- Ensure compliance with the child performance licensing regulations, if applicable
- Provide us with public liability insurance certificates

9.7. Hirers will be sent a summary copy of our Safeguarding Policy and Procedures and the full Safeguarding Code of Conduct. The hirers should be told to inform a DSO if the hirer has any concerns about the behaviour of our employees, volunteers or freelancers or if a safeguarding concern or allegation arises whilst they are onsite.

9.8. Hirers are required to complete a booking form and to complete a safeguarding checklist if they intend to involve children or adults at risk in their activity.

If the hirer does not meet our safeguarding requirements then the Programme Manager should escalate the matter to the DSO in order to determine whether the hire arrangement can proceed or not.

## 10. Lost or missing children on and offsite

### Lost children onsite

10.1. Children may become lost from a parent, carer or group when (a) visiting our site or (b) when they are participating in activities off site or where a hirer is delivering an activity on site. This situation can be highly distressing for the child and adults involved.

10.2.If anyone notices a child is lost anywhere onsite they should:

- Check out if the child is lost and get details of their name, age and who they were with and/or what activity they are participating in
- Take the child to the box office (located on the west side of the main Concourse)
- Alert the Operational Duty Manager who will lead in conjunction with the Security Supervisor on the relocating the missing child's Parent or Guardian
- Operational Duty Manager will alert Security Supervisor and also alert all FOH staff on the radio public announcement system to be used to alert Parent/Guardian if the information can be obtained from the lost child asking them to attend the Box Office
- Wait with the child until the responsible adult is located
- Check that the child and adult know each other
- Record the incident and outcome on the House Report

10.3.Children/young people being taken off site to participate in any activity should be given emergency contact details for Sage Gateshead.

## Missing children

10.4.If a child turns up for an event/activity onsite but subsequently goes missing from it without letting anyone know then it's important to act quickly to ensure the child is safe. If anyone identifies that a child has gone missing then they should:

- Alert the Operational Duty Manager in order that they can co-ordinate an immediate search of the building and outside areas;
- Contact the parent/carer to alert them and to find out if they know why the child has gone missing;
- Contact the child if we have their details and check what any other children know about their whereabouts;
- If the child cannot be found or located elsewhere then the police should be contacted. Clearly there is a judgment call to be made here about the level of risk to the child which will depend on their age and ability but this call must be done within a maximum of 30 minutes of the child going missing;
- Record the incident and outcome in the House Report.

If an organised group or hirer informs you that a child/ from their party has gone missing then this needs to be managed, as above, in conjunction with the group lead or hirer and a record made of the incident and outcome in the House Report.

If a child goes missing off site – follow the procedure as for onsite. There is no need to alert the Head of Visitor Experience, Sales and Conferences.

## 11. Children in performance or audience or participating in activities

### 11.1. Age restrictions and appropriate content

All employees, contractors and volunteers delivering any type of activity or performance must consider the appropriateness of the content for the audience in terms of taste and decency. It is the responsibility of Heads of and senior producers to assess the appropriateness of their events/performance or teaching for children and communicate this clearly in advance in publicity material and at the site. There will be a range of considerations including location of event, content of the performance, nudity, language, subject matter, availability of alcohol etc that will determine whether there will be any age restrictions to admittance.

## **11.2. Unaccompanied children**

### **11.2.1. Attending public events, performances or learning unaccompanied**

Sage Gateshead will only permit those young people aged 16 and over to attend performances or events unaccompanied by an adult providing the content is age-appropriate for them. Anyone under 16 years will not be allowed to attend a performance or event without an adult who is responsible for supervising them.

### **11.2.2. Attending workshops or performances**

Those aged 16 years and over are permitted to sign up for activities which also admit adults providing the content is suitable for them. However, because those aged 16-18 are still legally children then it is necessary that the tutor or event organiser collects sufficient registration information from the young person to ensure that their needs can be met and so that Sage Gateshead has an emergency contact number. These young people also need to be told whom they can speak to if they have any concern about any other members of the group/class.

### **11.2.3. Minimum age of child unaccompanied at supervised workshops and events**

For classes and activities which are supervised, for example facilitated by a Sage Gateshead tutor, children aged 8 years and over may attend unaccompanied provided that:

- a registration form been completed;
- the adult to child supervision ratio is adhered to which is outlined below:
  - 0 - 2 years - one adult to three children
  - 2 - 3 years - one adult to four children
  - 4 - 8 years - one adult to six children
  - 9 - 12 years - one adult to eight children
  - 13 - 18 years - one adult to ten children
- all the considerations about site security and safety have been addressed and communicated e.g. drop off and pick up points for parents/carers collecting children; children being unable to leave the building alone during the session; appropriate arrangements for going to the toilet; protection from other adults that may also be in the building at the same time etc.

## **11.3. Performance licenses for children (under 16 years) performances**

11.3.1. There is a legal requirement to obtain a licence before a child (from babies to compulsory school leaving age ) can take part in public performance (including the recording of performances for use on internet channels), sporting or modelling assignment where specific criteria are met.

11.3.2. Rather than provide full details here of when a licence or body of persons approval (BOPA) is required, Sage Gateshead employees who are involved in putting on a performance or allowing others to hire a Sage Gateshead venue for a performance, should check the regulations and the local child employment office to see if a performance licence or a Body of Persons Approval (BOPA) is required. This should also be considered when a hirer is making a booking for putting on a performance. The hirer is responsible for ensuring they have met the performance regulations.

11.3.3. A BOPA can be issued by a local authority in such cases where large numbers of children are taking part in a performance. It is issued for performances which would normally come under the licensing regulations. A BOPA will only be issued if the local authority is satisfied that the group has rigorous safeguarding policies in place. Where a performance is taking place under a BOPA, the legislation does not require that the child be supervised by a chaperone approved by the local authority. A BOPA cannot be issued if payment is made to the children or absence from school is required.

11.3.4. There will be occasions where performances are taking place that are exempt from the licensing regulations but individual children may need a performance licence due to the number of days they have previously performed. It is the responsibility of the organiser (most often this is a Programme Manager or Senior Producer) to obtain this information and apply for individual performance licences if required.

11.3.5. A performance licence application needs to be made 21 days before the actual performance date to the local child employment office where the child lives.

#### 11.4. Children in the audience

If any employees, freelancers or volunteers identify a safeguarding concern about a child who is attending a performance or event then they should follow the safeguarding procedures outlined in **Section 2**.

## 12. Use of Images – photographs and film

### 12.1. Marketing

Sage Gateshead may take photographs and films to use for marketing and promotional purposes. However, such images are people's personal data and therefore should be taken and stored in a way that is safe and complies with data protection law. The following procedures and principles apply to the taking of images of children:

- No images should be taken of children without parental/carer consent
- Children aged 16 years and above should also give their consent in addition to that of a parent/carer
- Consent needs to detail the specific use of any image, its retention and destruction period
- Names and addresses of children in images will not be stored alongside the actual images; rather a coding system will be used

### 12.2. Consent

- Sage Gateshead employees, volunteers and freelancers can only take photographs or film of people when there is a record of informed consent having been given.
- Informed consent means that we need to explain how the images will be used; for what purpose, it will be used; when and where it will be used (including the impact of publishing material online) and for how long it will be used.

- Signed consent forms must be dated. Ordinarily images will be used on an ongoing basis to promote the work of Sage Gateshead but in some instances it might be appropriate to include an expiry date if the images have only been agreed for a specific campaign or period in this instance, when the consent period is up – or if Sage Gateshead decides to use the material in a different way to what was originally agreed we must make reasonable efforts to track down the subject (and parents/guardians if they're still under 18) and ask them to renew their consent.
- Everyone featured in an image used by Sage Gateshead (including employees, volunteers, freelancers, contractors) should have given informed consent for the photograph/film to be taken. Best practice is to make a written note of the consent with a standard consent form. This is essential for anyone under 18 years.
- Consent is not required for crowd shots in public places where it would be impractical to ask everyone pictured – but everyone who's identifiable in the foreground – especially children/young people – should have given consent.
- Hard copies of consent forms will be retained and stored in the related venue or project folder in a locked cabinet or will be scanned and kept within the electronic project file.
- People have a right to withdraw their consent and if this happens then the images should no longer be used in future.

### **12.3. Anonymity**

Our standard practice is to protect the identities of all children in any images we take (unless specific consent has been gained to publish their name). This means that all names in any case study and/or photographs/films should be changed. This will be done by the relevant department and marketing team and approved by the relevant programme team before publishing.

We should always consider the potential impact on a child/young person in allowing us to use their information or their image.

### **12.4. Use of images - photography and filming**

Images taken must not be:

- Harmful to anyone in the future;
- Show anyone inappropriately clothed;
- Perpetuate negative stereotypes about children.

Images taken must be:

- Appropriate, dignified and for a defined work purpose only
- Taken and stored on Sage Gateshead equipment and not personal devices
- Destroyed once used for a specific purpose unless new permission has been sought to use them for different purpose
- Used only in Sage Gateshead publications or on company social media sites and not for personal use or posts

### **12.5. Professional Photographer/Film Maker**

Where Sage Gateshead uses a professional photographer or film maker then requirements about taking, storing and using images of children and adults and copyright will form part of the contractual arrangements.

See **Appendix 12: Film and Photography Consent Form**

## 13. Safeguarding induction and training

### 13.1. Induction

Sage Gateshead are committed to ensuring all employees, volunteers (including trustees) and contractors receive information about the safeguarding policy, procedures and code of conduct as part of their induction appropriate to their role and responsibilities.

13.2. The Head of HR and OD and SD with input from relevant senior managers will ensure safeguarding training is provided for employees, contractors and volunteers (including trustees) appropriate to their roles and responsibilities and ensure that this is monitored for compliance and reported on.

## Appendix 1: Defining child abuse and neglect

There are four categories of harm<sup>1</sup> although often children may suffer more than one type of harm.

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

**2. Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:

- not giving the child opportunities to express their views;
- deliberately silencing them, 'making fun' of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

**3. Sexual abuse and exploitation** 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:

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<sup>1</sup> HM Government (2018) [Working together to safeguarding children](#)

- physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing and touching outside of clothing.
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

*Child sexual exploitation* is a form of child sexual abuse. It occurs when 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 years into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for 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 using technology.

**4. Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- protect a child from physical harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

Neglect can also include neglect of, or unresponsiveness to, a child's basic emotional need

## Appendix 2: Indicators of child abuse and neglect

<p><b>Physical abuse</b></p> <p>Possible indicators are children who have:</p> <ul style="list-style-type: none"> <li>• frequent injuries</li> <li>• unexplained or unusual fractures or broken bones unexplained: bruises, cuts, burns, scalds, bite marks.</li> <li>• bruising in pre-mobile babies</li> </ul>	<p><b>Sexual Abuse and Exploitation</b></p> <p>Possible indicators of sexual abuse are children who:</p> <ul style="list-style-type: none"> <li>• display knowledge or interest in sexual acts inappropriate to their age</li> <li>• use sexual language or have sexual knowledge beyond their years ask others to behave sexually or play sexual games</li> <li>• self-harming behaviours</li> <li>• problems with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.</li> </ul> <p>Possible indicators of child sexual exploitation are children who:</p> <ul style="list-style-type: none"> <li>• appear with unexplained gifts or new possessions</li> <li>• associate with other young people involved in exploitation</li> <li>• have older boyfriends or girlfriends</li> <li>• suffer from sexually transmitted infections or become pregnant</li> <li>• suffer from changes in emotional well-being</li> <li>• misuse drugs and alcohol</li> <li>• go missing for periods of time or regularly come home late</li> <li>• regularly miss school or education</li> </ul>
<p><b>Emotional abuse</b></p> <p>Possible indicators are:</p> <ul style="list-style-type: none"> <li>• Children who are excessively withdrawn, fearful, or anxious about doing something wrong</li> <li>• Parents or carers who withdraw their attention from their child, giving the child the ‘cold shoulder’</li> <li>• Parents or carers always blaming their problems on their child</li> <li>• Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.</li> </ul>	<p><b>Neglect</b></p> <p>Possible indicators are:</p> <ul style="list-style-type: none"> <li>• Children who are living in a home that is persistently dirty or unsafe</li> <li>• Children who are frequently left hungry or dirty</li> <li>• Children who are left without adequate clothing for the weather conditions</li> <li>• Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence</li> <li>• Children who are often angry, aggressive or self-harm</li> <li>• Children who fail to receive basic health care such as dental treatment, medication when poorly, dressings for burns or cuts etc</li> <li>• Parents who fail to seek medical treatment when their children are ill or are injured</li> <li>• Children who are left alone when they are</li> </ul>

	young or left in the care of unsuitable adults or dangerous adults.
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### Appendix 3: Types and indicators of adult abuse and neglect

The Care Act 2014 recognises ten categories of abuse that may be experienced by adults:

<p><b>Physical abuse</b></p> <ul style="list-style-type: none"> <li>• Hitting</li> <li>• Slapping</li> <li>• Pushing</li> <li>• misuse of medication</li> <li>• restraint</li> <li>• inappropriate sanctions</li> </ul>	<p><b>Domestic abuse</b></p> <ul style="list-style-type: none"> <li>• psychological</li> <li>• physical</li> <li>• sexual</li> <li>• financial</li> <li>• emotional abuse</li> <li>• so-called 'honour' based violence</li> <li>• coercive and controlling behaviour</li> </ul>
<p><b>Sexual abuse</b></p> <ul style="list-style-type: none"> <li>• rape</li> <li>• indecent exposure</li> <li>• sexual harassment</li> <li>• inappropriate looking or touching</li> <li>• sexual teasing or innuendo</li> <li>• sexual photography</li> <li>• subjection to pornography or witnessing sexual acts</li> <li>• indecent exposure</li> <li>• sexual assault</li> <li>• sexual acts to which the adult has not consented or was pressurised into consenting</li> </ul>	<p><b>Emotional or Psychological abuse</b></p> <ul style="list-style-type: none"> <li>• emotional abuse</li> <li>• threats of harm or abandonment or deprivation of contact</li> <li>• humiliation</li> <li>• blaming</li> <li>• controlling</li> <li>• intimidation</li> <li>• coercion</li> <li>• harassment</li> <li>• verbal abuse</li> <li>• cyber bullying</li> <li>• isolation</li> <li>• withdrawal of services/support</li> </ul>
<p><b>Financial or material abuse</b></p> <ul style="list-style-type: none"> <li>• theft</li> <li>• fraud</li> <li>• internet scamming</li> <li>• coercion in relation to an adult's financial affairs or arrangements, e.g. regarding wills, property, inheritance or financial transactions</li> <li>• the misuse or misappropriation of property, possessions, or benefits</li> </ul>	<p><b>Modern slavery</b></p> <ul style="list-style-type: none"> <li>• slavery</li> <li>• human trafficking</li> <li>• forced labour and domestic servitude whereby traffickers and slave masters use whatever means they have to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment e.g. passports withheld, imprisonment, withholding wages and/or food, threats of harm to person/family</li> </ul>
<p><b>Discriminatory abuse</b></p> <ul style="list-style-type: none"> <li>• harassment</li> <li>• slurs or similar treatment because of a person's race, gender and gender identity, age, disability, sexual orientation, religion</li> </ul>	<p><b>Organisational abuse</b></p> <p>This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or the care provided in one's own home. It involves one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice</p>

<p><b>Neglect</b></p> <ul style="list-style-type: none"> <li>• ignoring medical, emotional or physical care needs</li> <li>• failure to provide access to appropriate health, care and support or educational services</li> <li>• withholding of the necessities of life, such as medication, adequate nutrition and heating</li> </ul>	<p><b>Self-neglect</b></p> <ul style="list-style-type: none"> <li>• neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding. Incidents of abuse may be one-off or multiple. Repeated instances of poor care may be an indication of more serious problems including organisational abuse</li> </ul>
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Four additional types of harm that are relevant to safeguarding adults but not included in the Care Act 2014:

<p><b>Cyber bullying</b></p> <p>This is where someone repeatedly bullies someone else through emails or texts or online forums.</p>	<p><b>Mate crime</b></p> <p>When vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. This can result in serious harm or even murder by people who purported to be their friend.</p>
<p><b>Forced marriage</b></p> <p>Where one or both partners are married without their consent or against their will. Forced marriage is a criminal offence</p>	<p><b>Radicalisation</b></p> <p>The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable people to the legitimacy of a cause. It may seek to involve them in committing violent offences.</p>

## Appendix 4: Grooming behaviour

'Grooming' is the process through which a person attempts to befriend a child with the intention of later developing a sexual relationship with them. It involves making the child feel comfortable through a variety of methods thus developing trust, before initiating physical contact and abusing that trust. Some argue that the term *entrapment* or *control* better describes this process.

An offender is likely to look to groom the adults as well as the child to gain their trust. This process can happen within a family or within an institution or organisation. Those who sexually abuse children are often experts at gaining confidence and can look for situations where they can have unsupervised access to children. Signs that an individual may be grooming a child or young person include:

- Being dressed inappropriately around the child or young person
- Spends most of his/her spare time with children and has little interest in spending time with someone of his/her own age
- Giving special attention to a child or young person
- Isolating a child or young person from other people
- Hugging, touching, kissing, tickling, wrestling with or holding a child or young person
- Giving gifts (including cigarettes/alcohol/drugs) or money for no apparent reason
- Treating a child as an equal/peer or like a spouse
- Finding ways to be alone with a child or young person when other adults are not likely to interrupt, e.g. taking the child for a car ride, arranging a special trip, etc.
- Not respecting the privacy of a child or young person
- Discussing their own sex life or asking a child or young person to discuss sexual experiences or feelings;
- Viewing abusive images of children
- Abusing alcohol or drugs or encourages children or young people to use them. The use of such substances reduces inhibitions.
- Allowing children or young people to consistently 'get away' with inappropriate behaviours
- Encouraging silence or secrets
- Makes fun of a child's body parts – uses sexualised names for the child or young person
- Not adhering to the rules, authority or code of conduct in the setting, organisation or within an activity

## Appendix 5: Child abuse in specific circumstances and vulnerabilities

**Abuse by peers.** Young people, particularly those living away from home, are vulnerable to physical, sexual and emotional bullying and abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult. It is subject to the same safeguarding children procedures as apply in respect of any young person who is suffering or at risk of suffering significant harm from an adverse source. A significant proportion of sexual offences are committed by teenagers. Employees should not dismiss some abusive sexual behaviour as “normal” between young people.

**Bullying** behaviour can be described as follows:

- deliberately causes hurt (either physically or emotionally)
- repetitive (though one-off incidents such as the posting of an image on the internet, or the sending of a text or sexting (sexually explicit photographs or messages) which is then forwarded to a group, can quickly become repetitive and spiral into bullying behaviour); and
- involves an imbalance of power (the person on the receiving end feels like they cannot defend themselves).
- Bullying is not:
  - teasing and banter between friends without intention to cause hurt
  - falling out between friends after a quarrel or disagreement; or
  - behaviour that all parties have consented to and enjoy (though this needs to be carefully monitored as coercion can be very subtle)

Bullying can take the following forms:

- emotional – being unfriendly, ignoring someone, not involving them in activities, sending hurtful or tormenting texts, humiliating or ridiculing someone
- physical – pushing, kicking, hitting, punching or pinching or any use of violence
- racist – racial taunts, graffiti or gestures
- related to a disability – because of how somebody looks or presents related to their disabilities (children with disabilities are more likely than their non-disabled peers to be excluded from activities)
- sexual – unwanted physical contact or sexually abusive comments (sexual bullying can also relate to gender and gender identity and includes those who do not fit with the gender role prescribed to them)
- homophobic – because of, or focusing, on the issue of a young person’s actual or perceived sexual orientation; or
- verbal (in the case of children with hearing disabilities this can take place in sign language) – name calling, sarcasm, spreading rumours or teasing.

**Child abuse linked to belief in “spirit possession” or “witchcraft”.** The belief in “possession” and “witchcraft” is widespread in some communities. It is not confined to particular countries, cultures or religions. The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but young people involved can suffer damage to their physical and mental health, capacity to learn, ability to form relationships and self-esteem due to extreme physical and emotional abuse that may be wrongly justified on the basis of spirit possession or witchcraft.

**Child abuse and social media.** The internet has become a significant tool in the distribution of abusive images of children. Social media is used as a means of contacting young people with a view to grooming them for inappropriate or abusive relationships. Contacts made initially in a chat room can be carried on via email, instant messaging services, mobile phones or text messaging. Cyberbullying, including sexting (which is illegal), is now widespread and can be very harmful to young people. Further advice and guidance on this topic are on the websites of the NSPCC, CEOP, Internet Watch Foundation and the UK Safer Internet Centre.

**Child trafficking.** Child trafficking is child abuse. This is where children are recruited, moved or transported and then exploited e.g. for sexual exploitation or domestic servitude. They are often subject to multiple forms of abuse. Children may be trafficked into the UK from abroad but can also be trafficked from one part of the UK to another.

**Child on Parent Violence (CPV)** or Adolescent to Parent Violence and Abuse (APVA) is any behaviour used by a young person to control, dominate or coerce parents. It is intended to threaten and intimidate and puts family safety at risk. Whilst it is normal for adolescents to demonstrate healthy anger, conflict and frustration drawing their transition from childhood to adulthood, anger should not be confused with violence. Violence is about a range of behaviours including non-physical acts aimed at achieving ongoing control over another person by instilling fear.

Most abused parents have difficulty admitting even to themselves that their child is abusive. They feel ashamed, disappointed and humiliated and blame themselves for the situation, which has led to this imbalance of power. There is also an element of denial where parents convince themselves that their son or daughter's behaviour is part of normal adolescent conduct.

**Child criminal exploitation.** It occurs when 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 any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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 using technology.

**County Lines.** This term is used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

**Disabled children.** Children with a disability or additional health needs are a particularly vulnerable group as signs of abuse and neglect may be masked or misinterpreted as being due to underlying impairments. Disabled young people are three times more likely than non-disabled children to experience abuse due to several factors:

- have fewer outside contacts than other young people;
- may receive personal care, possibly from several carers, which may both increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries;
- have an impaired capacity to resist or avoid abuse;
- have communication difficulties that may make it difficult to tell others what is happening or to be believed;
- be inhibited about complaining because of a fear of losing services;
- be especially vulnerable to bullying and intimidation and /or, abuse by their peers.

**Domestic violence and abuse** is 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 these harms:

- psychological
- physical
- sexual
- financial

- emotional

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

*Stalking* is a pattern of persistent and unwanted attention that makes a person feel pestered, scared, anxious or harassed. Some examples of stalking are: regularly giving unwanted gifts, making unwanted communication, damaging property, repeatedly following someone or spying on them and threats.

Children and young people living in families where they are exposed to domestic violence have been shown to be at risk of behavioural, emotional, physical and long term developmental problems. Everyone working with young people and families should be alert to the frequent inter-relationship between domestic violence and the abuse and neglect of young people.

**Female genital mutilation (FGM).** (also known as ‘female genital cutting’ or ‘female circumcision’.) Communities tend to use local names for referring to this practice including “sunna”. FGM-practicing families do not see it as an act of abuse; however, FGM has significant physical and mental health consequences both in the short and long term and, therefore, must not be excused, condoned or accepted. FGM cannot be left to personal preference or cultural custom as it is an extremely harmful practice that violates basic human rights. Girls are at risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. FGM is illegal in the UK and where it is suspected it must be referred onto children’s social care.

**Forced marriage.** A forced marriage (as opposed to an arranged marriage) is where one or both people do not (or in cases of people with learning difficulties or who are under-age, cannot) consent to the marriage and where duress is used to enforce the marriage. ‘Duress’ includes psychological, sexual, financial or emotional pressure and physical violence.

Forced marriage is a violation of human rights and is seen in the UK as a form of domestic violence or child abuse. It may affect girls, boys, women and men from any community or background. However, existing statistics show that greater numbers of women are affected.

Forcing someone to marry without their consent is a criminal offence. It is illegal to take someone overseas to force them to marry (whether or not the forced marriage takes place) or to marry someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not).

**Parental adversity.** Parental drug misuse can cause harm from conception to adulthood, including physical and emotional abuse and neglect. Where drug misuse co exists with domestic violence and mental illness the risk of harm to a child is even greater.

**Private fostering.** The legal definition of private fostering arrangements is an arrangement that occurs when a child who is under 16 (if disabled, under 18) is cared for by someone other than their parent or a close relative, with the intention that it should last for 28 consecutive days or more. The definition of a close relative is: step-parents, grandparents, brothers or sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

Private foster carers are not approved as local authority foster carers and usually have had no training to become carers. Families find private foster carers themselves, and it is their responsibility to find carers that

are suitable. If professionals become aware that a child is being privately fostered and that this is unregistered with the local authority then they require notification so they can assess whether the arrangement is safe and suitable for the child or young person.

**Risks outside the home.** The nature of abuse and neglect for teenagers is different from that of younger children. Behaviours by parents/adults that might be deemed abusive or neglectful for a very young child may be considered appropriate for teenagers. Additionally, they may face a wider range of risks due to the relationships they have, social media that they use, lifestyles that they Officer and with their increasing independence. Risk taking and experimentation is a normal part of growing up but also can place young people in harm's way.

**Race and racism.** Young people from black and minority ethnic groups may have experienced harassment, racial discrimination and institutional racism. The experience of racism may affect the responses of the child, adult or their families to other intervention in their lives. There is also a danger that professionals working with children may not intervene soon enough for fear of being seen as racist and in so doing, offer the child less protection.

**Unaccompanied asylum-seeking children (UASC).** A UASC is an asylum-seeking child under the age of 18 who is not living with their parent, relative or guardian in the UK. They can be more vulnerable to abuse and exploitation because they lack the necessary support networks, protection and communication skills.

**Young people whose behaviour indicates a lack of parental control.** When young people are brought to the attention of the police or wider community because of their behaviour, this may be an indication of vulnerability, poor supervision, abuse or neglect in its wider sense. It is important to consider whether these are young people in need of protection as well as support services and not to view them as only an offender as they may well be also victims themselves.

**Young people and gang activity.** Young people can be vulnerable to suffering harm in the gang context. For example, those young people who are:

- not involved in gangs, but living in an area where gangs are active, which can have a negative impact on their ability to be safe;
- not involved in gangs, but at risk of becoming victims of gangs;
- not involved in gangs but at risk of becoming drawn in, for example, siblings or children of known gang members; or
- gang-involved and at risk of harm through their gang-related activities e.g. drug supply, weapon use, sexual exploitation and risk of attack from own or rival gang members.

**Young carers.** A young carer is a person under 18 who provides or intends to provide care for another person (of any age except for where that care is provided for payment or as voluntary work). Young carers may require support services either for them or for the person they care for to ensure that their health and welfare does not suffer. In some instances, young carers may also need protection due to the adverse circumstances they may be experiencing or where the behaviour of the cared for person is abusive.

**Radicalisation and violent extremism.** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Government in the 2011 Prevent Strategy as: *Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.* It also includes calls for death of members of the armed forces, whether in this country or overseas.

Children or adults may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals. Indicators of radicalisation and violent extremism may include:

- showing sympathy for extremist causes
- justifying the use of violence to solve societal issues;
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- possessing illegal or extremist literature
- out of character changes in dress, behaviour, peer relationships or acting secretively
- online searches or sharing extremist messages or social profiles
- verbalising anti-Western or anti-British views

## Appendix 6: Barriers to help seeking

Many children and adults are reluctant to seek help because they feel that they do not have anyone that they can turn to for support. They may have sought help in the past and had a negative experience, which makes them unlikely to do so again. In an NSPCC study of child maltreatment (2000), only a quarter of the people that had experienced sexual abuse as a child had told anyone at the time. Being unable to tell someone that you are being abused can be very stressful and may leave a vulnerable child at risk of continuing or further abuse.

People may not seek help because they:

- fear of not being believed
- feel too embarrassed to talk to an adult about a private or personal problem
- worry that their concern will not be taken seriously
- worry about confidentiality and lack trust in both the people around them (including parents) and in the services provided to help them
- fear the consequences of asking for help
- fear the situation could become worse
- experience of disclosure in which they were not listened to

Some groups of children and adults experience more barriers. For example, boys are often more reluctant to seek help than girls. Children with communication difficulties may lack the language necessary to enable them to express what is worrying them. Children that are more isolated are less likely to share their concerns for example children living in residential care.

### Barriers for adults to listen

Sometimes there is reluctance by professionals to listen to what children are telling them and to act on it.

Adult fears may be due to:

- Not knowing how to react or who to tell
- Fear of getting it wrong
- Loyalty to the family or colleagues
- Lack of trust in the child protection system
- Not recognising the significance of the indicators.

### How to encourage children and adults to seek help and support

- Make it easier for children and adults to take up the offer of help
- Listen to the people you help - see the whole person
- Build trust - treat children and adults with respect
- Empower adults to find their own solutions
- Advertise the benefits of seeking help
- Help to tackle the myths about those who seek help – seeking help is not a sign of weakness.

## Appendix 7: Safeguarding Contacts

Name and job title	Safeguarding Role	Contact details
	General contact email and phone number	<a href="mailto:safeguarding@sagegateshead.com">safeguarding@sagegateshead.com</a> (0191) 443 4625
Sara Vening	Safeguarding Director (SD)	<a href="mailto:Sara.Vening@sagegateshead.com">Sara.Vening@sagegateshead.com</a> 0191 443 5168
Hannah Fumoleau	DSO - Young Musicians Programme, Manager	<a href="mailto:Hannah.Fumoleau@sagegateshead.com">Hannah.Fumoleau@sagegateshead.com</a> 0191 443 5166
Abi Grocock	DSO-RNS and Classical	<a href="mailto:abi.grocock@sagegateshead.com">abi.grocock@sagegateshead.com</a> 0191 443 4630
Jo Thornton	DSO- Contemporary	<a href="mailto:Josephine.thornton@sagegateshead.com">Josephine.thornton@sagegateshead.com</a> 0191 443 4589
Chris Laws	DSO- Conference and events	<a href="mailto:chris.laws@sagegateshead.com">chris.laws@sagegateshead.com</a>
Stephen Hudson	DSO- Front of house	<a href="mailto:Stephen.hudson@sagegateshead.com">Stephen.hudson@sagegateshead.com</a>
Lewis Hyam	DSO – Online activity	<a href="mailto:Lewis.hyam@sagegateshead.com">Lewis.hyam@sagegateshead.com</a> 0191 443 4619
Aurora Kerr	Head of HR and OD	<a href="mailto:Aurora.Kerr@sagegateshead.com">Aurora.Kerr@sagegateshead.com</a> 0191 443 4607
Gateshead Council Children's Services	Receives and investigates child protection concerns	0191 433 2653 (office hours) 0191 477 0844 (out of hours, at night, at weekends and bank holidays)
Gateshead Council LADO	For making referrals about an allegation of abuse against member of employees, volunteer, freelancers etc.	0191 433354 <a href="mailto:Nicholasleon@gateshead.gov.uk">Nicholasleon@gateshead.gov.uk</a>
Gateshead Council	General contact to raise a concern about a child or if you have a safeguarding query.	Office Hours: (0191) 433 2653 Out of hours: (0191) 477 0844

Name and job title	Safeguarding Role	Contact details
Newcastle City Council	As above	Office Hours: (0191) 277 2500 Out of hours: (0191) 278 7878
Sunderland City Council / Together for Children	As above	Office Hours: (0191) 561 7007 Out of hours: (0191) 520 5552
Durham County Council	As above	24 hours: 03000 267 979
Northumberland County Council	As above	24 hours: (01670) 536400
NSPCC Helpline	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
Childline	24-hour helpline for children and young people aged up to 19 years	0800 1111
Professionals Online safety helpline (POSH)	Advice for professionals about online safeguarding concerns	0344 381 4772 <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>
Gateshead Adult Safeguarding		Adult Social Care Direct 0191 433 7033 (24 hours a day, 7 days a week)  If you have a safeguarding adult query you can speak to the Safeguarding Adults duty worker on 0191 433 2222. This number is for safeguarding queries only and not safeguarding referrals
Ann Craft Trust (ACT)	For advice and training in respect of safeguarding adults	0115 951 5400 <a href="mailto:ann-craft-trust@nottingham.ac.uk">ann-craft-trust@nottingham.ac.uk</a>
The Mix	Helpline for young people under 25 years	0808 808 4994
Whistle blowing advice line (external)	Advice can be sought from NSPCC if using the HCT whistleblowing procedure has not resolved a concern satisfactorily	0800 028 0285
Protect	Provides advice for whistle-blowers who are raising concerns about wrong	0207 3117 2520

Name and job title	Safeguarding Role	Contact details
	doing or serious risk in their organisation	
The UK Safer Internet Centre	Provides advice for professionals and responds to reports about sexual abuse images of children online	0844 381 4772
Child Exploitation and Online Protection Centre(CEOP)	Investigates inappropriate online behaviour such as grooming online or sexual exploitation	0870 000 3344
Internet Watch Foundation	Remove images of child sexual abuse content and criminally obscene content online	01223 203030
Disclosure and Barring Service (DBS)	Advice line for criminal records checks and barring people from working with children or adults at risk	03000 200 190
Local authority Children's Social Care (England)	Use the following website to find out the details: <a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>	
NAPAC (National Association for People Abused in Childhood)	Support for adult survivors of child abuse, their friends and family	0808 801 0331 <a href="mailto:support@napac.org.uk">support@napac.org.uk</a>
National Domestic Abuse Helpline	24-hour advice line	Tel 0808 2000 247

## Appendix 8: Safeguarding Report Form

- Enter as much detail as possible.
- Don't delay making a referral if there is information missing.

Part 1 Details of the child or young person		
Name of child or adult		
Gender:	Age:	Date of Birth:
Religion	Ethnicity	Any additional needs (e.g. disability)
Parent/Carer name(s) if known:		
Home address of child or adult		
Place/time/date where the concern was identified		
Part 2 Details of a safeguarding allegation against employees/volunteers/ third parties		
Name and role of person who is the subject of the allegation		
Age and/or Date of Birth		
Home address		
Place/time/date where the concern was identified		

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**Part 3 Your Details:**

Your Name:	Your Position:	Your contact details

**Part 4 Report:**

Are you reporting your own concerns or responding to concerns raised by someone else?

<input type="checkbox"/> Responding to my own concerns  <input type="checkbox"/> Responding to concerns raised by someone else	If responding to concerns raised by someone else, please provide their name, role and contact details (if known):
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Please provide details of the safeguarding concern or allegation including times, dates, any visual observations of injury or the mental state and other relevant information. Make it clear whether you are giving a fact, expressing your opinion or expressing the opinion of someone else.

--

The child or adult's account of what happened (e.g. of any incident, injury, disclosure, behaviour) if known

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<p>Please provide details of the person alleged to have caused the incident/injury if known (e.g. names(s) /address/ incident address /relationship to child or adult</p>
<p>Please provide details (name, role contact details if known) of any witnesses to the incident/concerns:</p>

<b>Part 5: Actions Taken</b>	
State any risk of immediate harm	
Identify any action taken already e.g. contact with police, CEOP, IWF, social care, NSPCC helpline etc.	
Is the child or adult or accused person aware that a report has been made to the DSO	
If a referral is being made externally are the parents/carers aware of this?	
Any known previous records of safeguarding concerns or allegations	
Any further information or comments or actions to be taken	

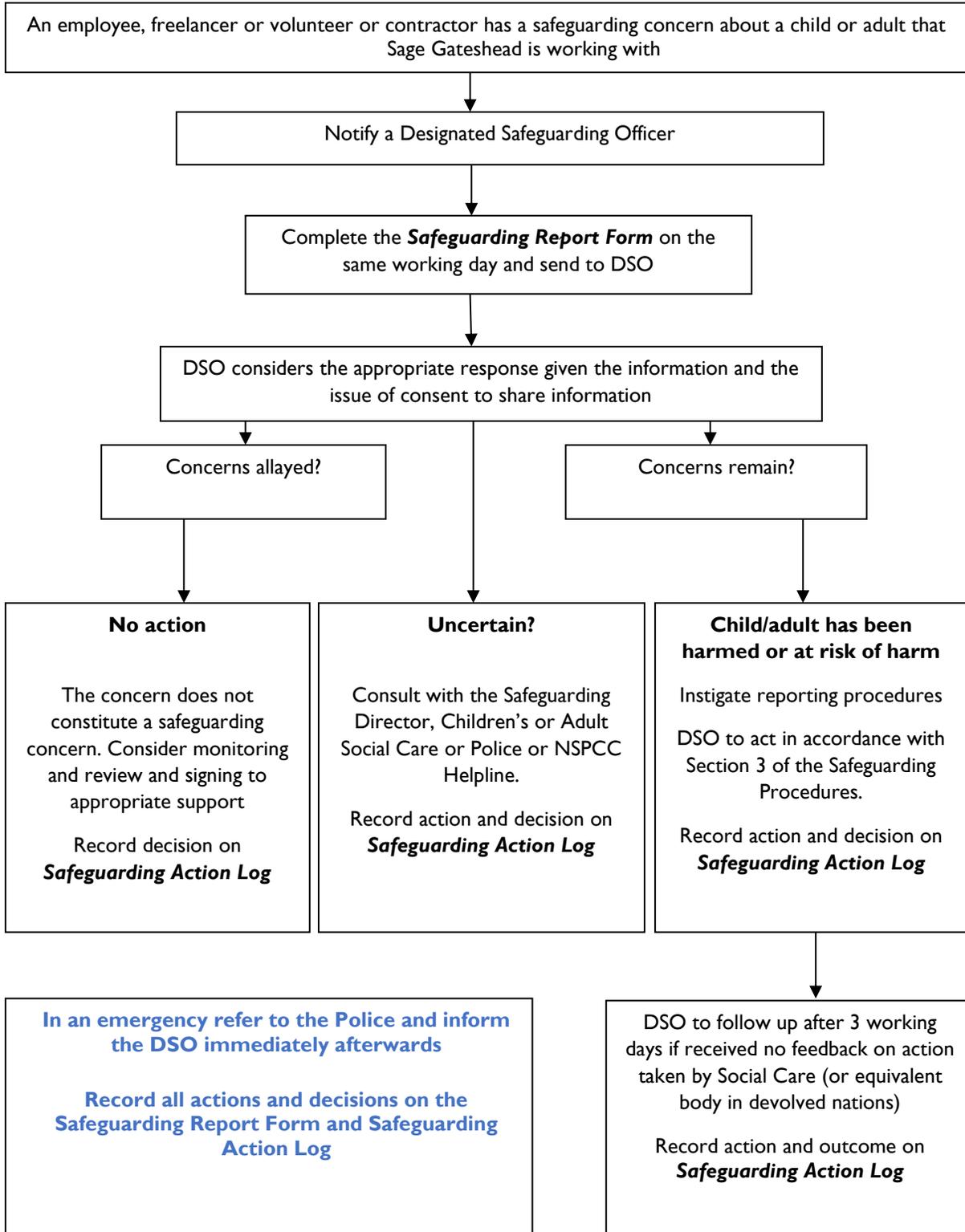
**Date and time of report being submitted and to whom.....**

<b>Part 6: Immediate action and decisions by DSO</b>

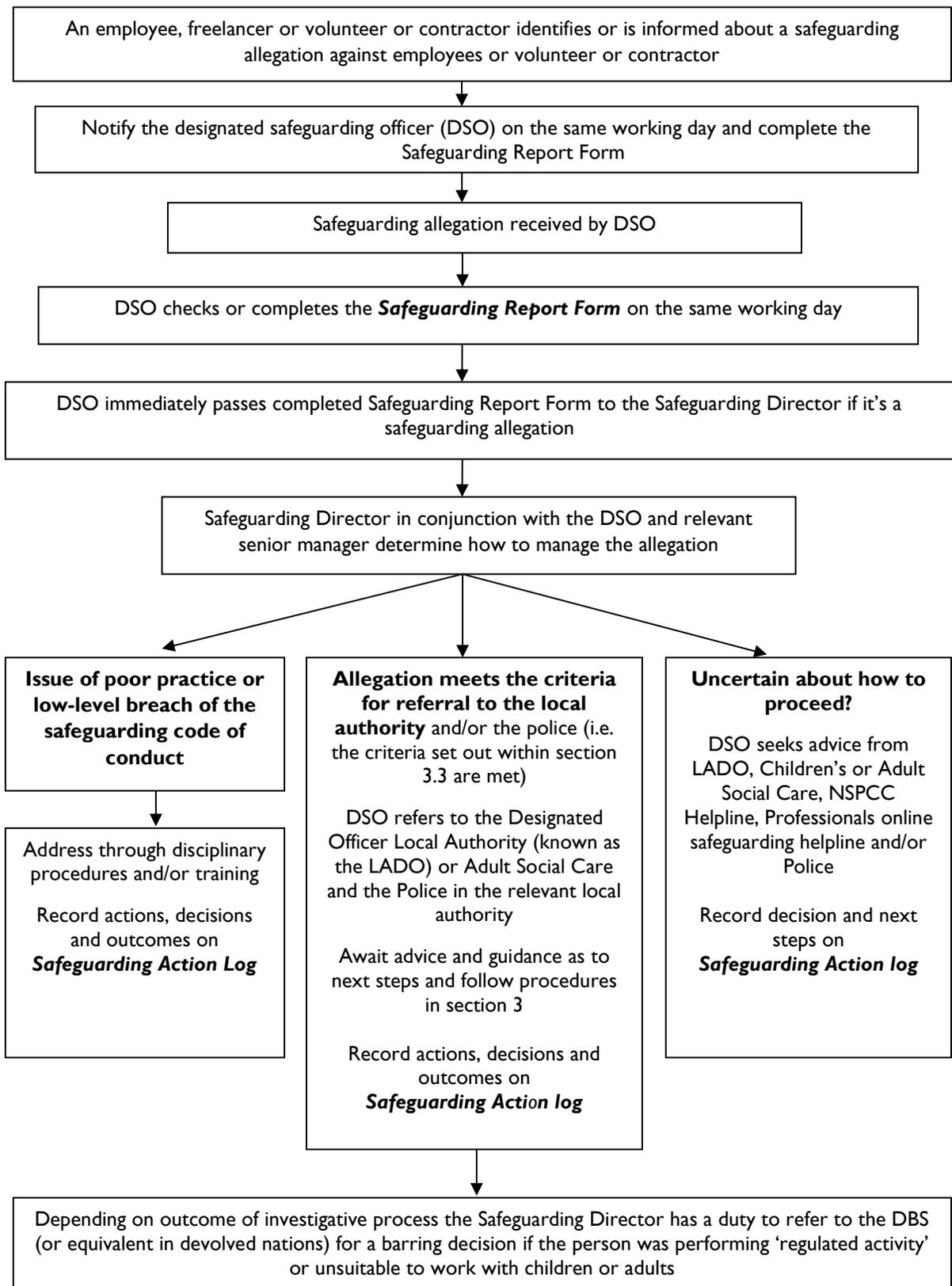
### Appendix 9: Safeguarding Action Log

Date & time	Name	Notes	Action	By Whom

## Appendix 10: Flowchart: Responding to a safeguarding concern about a child or adult that Sage Gateshead is working with



## Appendix I I: Flowchart: Responding to a safeguarding allegation



## Appendix 12: Safeguarding Checklist for Partner Organisations working with Sage Gateshead

Sage Gateshead is committed to promoting the safety and welfare of all children and young people as a part of its duty of care. To this end we want to be satisfied that where we have partnership arrangements that these fully include safeguarding arrangements. Therefore, please complete this form and return to [add name].

Sage Gateshead is not responsible for quality assuring your policies and procedures. By completing and signing this document you are confirming that what you have in place is suitable and fit for purpose and complies with relevant law, guidance and best practice.

**Name of partner organisation**.....

**Name of person completing this form & job title**  
.....

### Section 1: Safer employees and volunteers - recruitment, selection induction and support

You have in place	Yes or No	Additional comments
A written recruitment and selection policy and procedure which includes:		
An application form		
A face to face interview conducted by interviewers that have relevant knowledge and experience of current safeguarding practices.		
Interview questions that draw out people's attitudes and values in relation to the protection of children		
A request for 2 references, 2 pieces of identification and original copies of necessary qualifications before employees appointment or commencement as a volunteer.		
Different levels of recruitment and security checks commensurate with safeguarding requirements of the role.		
Criminal records checks with a process to risk assess any positive disclosures.		
Induction and support is provided for all employees/volunteers.		

## Section 2: Child protection

You have in place:	Yes or No	Additional information
A written statement of your organisation's commitment to protecting all children and young people from harm. Such a policy should ensure no child is discriminated against.		
Written procedures for dealing with situations where a child or young person says they are being abused or neglected or is showing signs of harm.		
Written procedures for dealing with situations where allegations of abuse are made against employees or volunteers		
Written details about how any information regarding children and their families will be held and under what circumstances such information may be shared with other agencies.		
Mandatory training on safeguarding for new trustees/employees/volunteers within a suitable and appropriate timeframe of them joining your organisation		
Regular mandatory refresher training on safeguarding to employees and volunteers		
A nominated/designated person in your organisation with a lead responsibility for managing any safeguarding concerns or allegations and reporting regularly to the senior leadership and Board		
Information for parents of children with whom it has contact giving details of its child protection procedures and how they may make complaints if they have any concerns about the treatment of their child/ren.		

### Section 3: Safeguarding Code of Conduct

You have in place:	Yes or no	Additional information
A code of behaviour for employees and volunteers that sets out clear expectations of behaviour and what will happen in the event of non-compliance or breach of these standards		
A policy on harassment, sexual harassment and bullying of employees or volunteers which makes the organisation's commitment to zero tolerance and a process for dealing with such concerns if they arise		
Employees and volunteers are provided with training on the code of conduct as part of their induction		

### Section 4 Risk Management

You have in place	Yes/no	Additional information
A risk register that captures any safeguarding risks in your organisation		
Regular oversight of your risk register by senior management or Board		

### Section 5: Whistleblowing

You have in place:	Yes or No	Additional information
A whistle blowing policy which protects the whistle blower from reprisals and includes clear processes for dealing with concerns raised and by whom and the timescales involved.		

### Section 6: Avoiding accidents and running safe activities

You have in place:	Yes or No	Additional information
An accident prevention policy and procedures.		

Risk assessment procedures regarding activities with children		
Regular checks on equipment used by children and young people carried out in accordance with health and safety guidance.		
Adult to child ratios which are appropriate and safe.		
A policy on parental consent to activities for children up to their 18 <sup>th</sup> birthday unless those young people are living away from home or being cared for by the local authority		
Information about each person's medical and dietary needs, allergies and specific individual requirements.		
Parent/carer/guardian contact details.		
Public liability insurance with no exclusions for child abuse.		

**Signature.** *I confirm that the measures listed above are in place. I also understand that if a child is at risk of harm or is harmed or there is a serious concern about the behaviour of an adult while delivering services on behalf of SAGE GATESHEAD I will notify [insert name] at SAGE GATESHEAD within one working day of the concern being identified. This is for information purposes only.*

Signature and date.....

<b>For internal use only:</b>
Form seen and approved/not approved by:
Any notes:

## Appendix 13: Responding to sexting incidents where this involves the sharing of self-generated nudes or semi nudes – guidance for DSOs

**What does the law say?** In the UK, the age of consent for sexual intercourse is 16. However, it is an offence to make, distribute, possess or show any *indecent* images of anyone aged under 18, even if the content was created with the consent of that young person. The law<sup>2</sup> criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people. The law was also developed long before mass adoption of the internet, mobiles and digital photography.

Despite this, children who share nudes and semi-nudes of themselves, or peers, are breaking the law. Examples include:

- a child (under 18) sharing a sexual image with their peer (also under 18);
- a child (under 18) sharing a sexual image created by another child with a peer or an adult;
- a child (under 18) in possession of a sexual image created by a child (under 18).

“Indecent” means, for example:

- naked pictures;
- topless pictures of a girl;
- pictures of genitals;
- sex acts including masturbation; and
- sexual pictures in underwear.

Whilst children creating and sharing images can be risky, it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be ‘harmful’ to all children. Situations should be considered on a case by case context, considering what is known about the children involved and if there is an immediate risk of harm. Often, children need education and support for example, on identifying healthy and unhealthy behavior’s within relationships and understanding consent and how to give it. Safeguarding action will be required in cases where there is risk of harm.

### Actions by the DSO

The DSO must process and record any sexting incidences following the Safeguarding Procedures Section 2. They should consider the type of sexting and the degree to which harm has been caused in order to judge if a report needs to be made to the police and children’s social care. A report should always be made in the following circumstances where sexting involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g if they have a learning difficulty]
- images show atypical sexual behaviour for the child’s developmental stage

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<sup>2</sup> Protection of Children Act 1978

- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

DSOs might consider the different contexts for sexting to help their judgment of risk of harm. The following categorisation might help the DSO in thinking about risks and whether to report an incident: Incidents can broadly be divided into two categories<sup>3</sup>:

**Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes:

- **adult involved:** adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders.
- **youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
- **youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

**Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse: **romantic:** incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair

- **‘sexual attention seeking’:** the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image.
- **other:** cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

The DSO should:

- Support the child to understand what’s happened and thank them for telling you, explain that there are some steps you can take together to ask for the image to be removed however never promise that they will be removed because there are tight controls on what is actually removed.
- Encourage the child to seek support from Childline who can explain the process – adults can speak to the NSPCC Helpline for support
- Initiate the management of allegations procedures (Section 4) if it’s an employee, freelancer, volunteer or contractor that has sexted a child
- If possible, try to gather a list of where the image has appeared or who has received it
- Adults can make an online report to CEOP (Child Exploitation and Online Protection Command), or contact their local police force for support if they have concerns a child is being groomed or sexually abused online

<sup>3</sup> Wolak, J. and Finklehor, D. (2011) *Sexting: a typology*. Crimes Against Children Research Center.

- Adults can also report the URL of images for removal directly to the Internet Watch Foundation or use the Report Remove function on the Childline website.
- Do not copy or send the image to anyone, even the police – the image will constitute an indecent image of a child and should not be shared or saved
- Children can upload their own image or URL to the Internet Watch Foundation’s Portal via Childline for removal
- Advice can also be sought from the POSH (see **Appendix 7** for their details)

**Police response** sharing nudes or semi nudes by children will primarily be considered as a safeguarding issue rather than a criminal one. The police do not want to criminalise children unnecessarily. They have the discretion not to record the incident and will make a decision based on public interest. (known as outcome 21).

For further guidance on the issue of sexting see: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

## Appendix I4: Sage Gateshead Photography and Film Consent Form for Under 18s

Name of Group or Department [add]

<b>Event/activity</b>	[add title]
<b>Date</b>	[add date]
<b>Purpose for taking photographs or film</b>	[add details]
<b>Photographs/film will be published in these ways:</b>	[add detail]
<b>Photographs or film will be stored for</b>	In perpetuity / or for a fixed number of year [add ]

Sage Gateshead wishes to take, use and store photographs or films of children and young people under the age of 18 years. However, we will only do this if we have obtained written permission from a parent or guardian and from any young person aged 16 years and upwards.

We will store photographs and videos of children and young people securely, in accordance with our safeguarding policy and data protection law. We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access.

Images will be stored in perpetuity, so that we can continue to use them to promote the work of Sage Gateshead. Individuals will always be given the opportunity to opt out of permissions for their image to be used and/or stored.

We will never store images of children or young people on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

**Please turnover to complete your details and sign if you give us your permission.**

If you wish to withdraw your permission at any future point or if you have any questions then please contact [DataProtection@sagegateshead.com](mailto:DataProtection@sagegateshead.com)

**To find out more about our safeguarding policy and procedures go to:**

<https://sagegateshead.sharepoint.com/sites/Safeguarding>

**Please complete the boxes below if you give your permission:**

Full name of child	
Date of Birth	
Address	
Contact Telephone Number (if applicable)	

**Parent/Guardian information**

Parent/Guardian's Name	
Parent/Guardian's email address/contact number	

**Consent**

**Please indicate your response to these questions**

I give my permission for the above-named child to be photographed by Sage Gateshead as outlined in this form.  
YES/NO

I give my permission for the above-named child to be filmed by Sage Gateshead as outlined in this form.  
YES/NO

I give permission for my child's name and age to be published with the photograph/film YES/NO

I understand that by signing this form that Sage Gateshead is obliged to keep a copy of it to comply with our wishes and data protection law.

**For child**

<b>Please sign here if you agree to being photographed or filmed*</b>	
<b>Date</b>	

**\*this must be signed by the young person if they are aged 16 years and above**

**For the parent/guardian**

<b>Please sign &amp; note your relationship to the child/young person</b>	
<b>Date</b>	

## Appendix I5: Serious Incident Reporting<sup>4</sup> to the Charity Commission – guidance for the safeguarding director and trustees

Sage Gateshead must comply with the serious incident reporting procedures as required by the Charity Commission for England and Wales. They expect a report if a serious safeguarding risk materialises. This will usually be if any of the following occur<sup>5</sup>:

- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in, or risk, significant harm to them and:
  - this happened while they were under the care of the charity
  - someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and or adults.

The above may include incidents in the workplace that have resulted in or risk significant harm to trustees, employees or volunteers. This does not mean that the Charity Commission expects charities to report every internal staffing incident - charities need to make a judgement call about which incidents either individually, or as a collection, are serious in the context of the charity.

However, a report should always be made where the level of harm to the victims and/or the likely damage to the reputation of, or public trust in, the charity is particularly high (for example, sexual misconduct by the charity's Chief Executive or another person in a senior position or position of specific responsibility, such as the Safeguarding Director). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity. This is because abuse can thrive in such conditions or people may be fearful of sharing concerns because of the consequence treatment they may receive from colleagues.

Sage Gateshead may be alerted to alleged abuse of a beneficiary, employee, volunteer or someone else who it encounters through its work, which has occurred outside of the charity (e.g. in the family home or community) and:

- The abuse was not connected to its activities in any way
- The person responsible for the abuse was not a trustee, staff member or volunteer.

In such incidents, Sage Gateshead are **not** expected to report to the Commission unless it's found (or alleged) that the incident wasn't handled appropriately by us and this resulted in harm to the person or persons concerned. In such circumstances, a report should also be made to the police and local authority.

The guidance (How to report a serious incident in your charity, June 2019) provides examples of the types of incidents that should be reported<sup>6</sup>.

<sup>4</sup> In Scotland, this is referred to as 'Notifiable Events'

<sup>5</sup> <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity> Accessed online on 5/1/21

<sup>6</sup> Examples table - deciding what to report:

A serious incident report should be submitted to the Charity Commission via their online form.

### **The Commission's role in relation to safeguarding incidents**

The Commission's role is to ensure that trustees are handling the incident appropriately and, where necessary, putting in place improved governance and internal controls, to prevent further harm.

The Commission is not responsible for dealing with incidents of actual abuse or mistreatment and it does not administer safeguarding legislation. It cannot prosecute or bring criminal proceedings although it may refer concerns on to 'lead agencies', such as police, local authorities and the Disclosure and Barring Service, as well as to specialist bodies responsible for designated areas, such as education or health and social care.

### **What to report to the Charity Commission**

The Commission's Serious Incident Reporting Guidance notes that it is important to provide enough detail in the report to give the Commission a clear picture of what happened and when, the extent of any loss or harm, how the charity is dealing with it and the planned/possible next steps. It is important to balance the fact-finding exercise with the need to report incidents promptly.

The SIR Guidance says that if, having submitted a report to the Commission, the charity becomes aware of any material changes to the facts reported or significant developments, the charity must inform the Commission as soon as it becomes aware of them.

Information to be included in the report to the Commission:

#### **Contact details**

- the individual submitting the report and their connection to Sage Gateshead;
- the charity name and its registration number
- reference number and contact details if it's been reported to other organisations such as the police or children's social care
- who within the Sage Gateshead trustee body is aware of the incident

#### **Incident details**

- date of the incident
- what happened
- date the charity found out about the incident
- how the charity found out about the incident
- what impact the incident has had on the charity's beneficiaries, employees, operations or reputation
- whether trustees are aware of the incident

#### **How the incident is being handled**

- which of the charity's policies or procedures relate to the incident and whether they were followed?
- what steps the charity has taken to deal with the incident?
- what steps the charity has taken to prevent similar incidents?
- where applicable, the charity's media handling or press lines, including a link to press release if available
- it is not necessary to provide the names or any other personal details of any individuals involved in the incident in the initial report – the Commission will request this information if they need it.

#### **Confidentiality and data protection**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752170/RSI\\_guidance\\_what\\_to\\_do\\_if\\_something\\_goes\\_wrong\\_Examples\\_table\\_deciding\\_what\\_to\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752170/RSI_guidance_what_to_do_if_something_goes_wrong_Examples_table_deciding_what_to_report.pdf)

Accessed 16/3/21

All serious incident reports should be marked as confidential (unless the information is already wholly available in the public domain, which is highly unlikely). In addition:

- any personal data should be removed to the greatest extent possible and, if appropriate, the risk of identification of individuals (though unnamed) should be highlighted
- any particularly sensitive information in the report should be identified;
- any specific exemptions from disclosure (such as an exemption under the Freedom of Information Act) should be specifically referred to and relied upon; and
- the report should contain a request that it is not disclosed to third parties and that the Commission notifies the charity if it receives a request to disclose information to third parties (e.g. the media or individuals).

### **What happens next?**

The Commission will acknowledge receipt of the report. It will assess the risk and look at how Sage Gateshead is dealing with the incident, and may take steps to verify the details, for example and where relevant, by contacting the police. The Commission may also follow up if it:

- needs more information about the incident
- thinks Sage Gateshead regulatory advice and guidance
- has to use its legal powers to protect the charity and/or the people who come into contact with the charity through its work
- decides to request updates on future development
- needs to monitor the charity's progress in dealing with it
- in very serious cases the Commission may take steps to exercise its enforcement powers, for example, issuing a warning or opening a statutory inquiry into the charity, though it is rare that it would do so without some form of preliminary communication or dialogue.

### **Learning from serious incidents**

It is important that Sage Gateshead appropriately manages and responds to a serious incident. This includes learning from the incident and taking steps to minimise further harm in consequence of the incident and to prevent similar incidents from occurring in the future.

The SD and lead trustee for safeguarding should consider whether Sage Gateshead has taken appropriate steps to respond to a serious incident and ensure that sufficient controls and procedures are put in place to mitigate and manage any future risks to the Charity and its beneficiaries.