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# **THE WALLACE COLLECTION SAFEGUARDING POLICY 2021**

Updated 03/09/2021

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# 1. SAFEGUARDING POLICY STATEMENT.

**This policy statement applies to our visitors and participants, as well as anyone working on behalf of the Wallace Collection including senior managers and directors, trustees, employees, contractors and volunteers.**

The Wallace Collection works with children, young people, families and adults at risk as part of its activities. These include age-specific learning sessions onsite at the museum, online, and through outreach in the community.

## **THE PURPOSE OF THIS POLICY.**

- Protect children and adults at risk who receive the Wallace Collection's services, which includes the accompanying children of adults who use our services;
- Provide parents, staff and carers with the overarching principles that guide our approach to protecting children and adults at risk.

## **WHAT WE BELIEVE.**

- Children and adults at risk should never experience abuse or harm of any kind;
- We have a responsibility to promote the welfare of all children and adults at risk, to keep them safe and to practise in a way that protects them.

## **WHAT WE RECOGNISE.**

- The welfare of children and adults at risk is paramount;
- Everyone regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse;
- Some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;
- Children and adults at risk should be able to use our services but that specific safeguards need to be in place;
- We have a duty of care to protect children and adults at risk from potential harm.

## **WHAT WE WILL DO TO KEEP CHILDREN AND ADULTS AT RISK SAFE.**

- Value, respect and listen to them;
- Appoint a Designated Safeguarding Lead and Deputy Safeguarding Lead(s);
- Develop safeguarding policies and procedures which reflect best practice;
- Use our safeguarding reporting procedures to share concerns and relevant information with agencies who need to know, as well as involving children and adults at risk, parents, families and carers appropriately;
- Not undertake regulated activities (see page 10) with children except by personnel who have current Enhanced DBS check status;
- Not undertake regulated activities with adults at risk;

- Undertake appropriate DBS checks for all employees, contractors and volunteers who work with children or adults at risk, and keep appropriate records;
- Create and maintain an anti-bullying environment and ensure that we have procedures to help us deal effectively with any bullying that does arise;
- Implement an effective Online Safeguarding Policy and related guidance;
- Recruit staff and volunteers safely, ensuring all necessary checks are made;
- Provide effective management through supervision, support and training;
- Implement a code of conduct for staff and volunteers;
- Ensure that we have effective complaints and whistleblowing measures in place;
- Ensure that we provide a safe physical environment for children and adults at risk, staff, freelancers and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance;
- Record and store information professionally and securely and in accordance with GDPR and data retention policy.
- Have a minimum age for independent visitors, which is age 13 and over.

### **WHAT WE EXPECT FROM PARTICIPANTS ENGAGING IN OUR ACTIVITIES.**

Responsible adults, including teachers, parents, group leaders and carers who book our sessions must:

- Read and agree to our Safeguarding Policy before participating;
- Read any additional guidance pertaining to specific activities before participating;
- Encourage participants to behave responsibly and show respect for others, and address any violent or inappropriate behaviour;
- Provide sufficient supervision at all times by being present throughout activities with children and adults at risk, in the required adult-to-participant ratios;
- Not record or undertake any image capture unless through prior written agreement with all participating persons;
- Ensure that the Wallace Collection is aware of any relevant information that may affect participation in an organised activity, for example religious belief, SEN, disability or health circumstance;
- Undertake a risk assessment prior to visiting;
- Contact Wallace Collection staff immediately in the case of an accident or lost child;
- Follow instructions from Wallace Collection staff in the event of any emergency or incident, including but not restricted to fire, security or health and safety threats.

### **WHAT WE WILL UNDERTAKE IN THE EVENT OF AN INCIDENT OR CONCERN.**

- Immediately report the matter to the Wallace Collection Safeguarding Lead or Deputy;
- Robustly follow the process set out in the Wallace Collection's Safeguarding Incident or Concern Reporting Procedure;
- Immediately report very serious allegations to the police and relevant agencies;
- Comply with wider safeguarding policies and procedures where appropriate;
- Treat all matters seriously and keep an open mind.

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## 2. LEGAL FRAMEWORK.

**This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in England and Wales including *The Children Act (1989; 2004)*, *The Children and Families Act (2014)* and *The Safeguarding Vulnerable Groups Act (2006)*.**

This policy should also be read alongside other organisational policies, including:

- Code of conduct for staff and volunteers;
- Disciplinary and dismissal policy and procedures;
- Anti-bullying procedures;
- Safer recruitment procedures, including DBS procedures;
- Records retention and storage policy;
- Whistleblowing policy;
- Safeguarding incident or concern reporting procedures;
- Procedures for managing allegations against staff and volunteers;
- The role of the Designated Safeguarding Lead and Deputy Lead(s);
- Adult-to-child supervision ratios adults at risk supervision;
- Photography and image sharing guidance.

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## 3. ONLINE SAFEGUARDING POLICY.

**This policy aims to ensure safe participation in Wallace Collection online sessions. It applies to all Wallace Collection staff and freelancers, as well as participating children and their teachers, parents and carers, and adults at risk and their carers.**

The policy sets out the responsibilities and safeguarding measures to be taken by Wallace Collection staff and freelancers, as well as teachers, group leaders and carers participating with children and adults at risk online.

### WHAT WE RECOGNISE.

- The welfare of children and adults at risk is paramount when they are online;
- Everyone regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse online;
- Some people are additionally vulnerable online because of the impact of previous experiences, their level of dependency, communication needs or other issues;
- Children and adults at risk should be able to use the internet for learning but that specific safeguards need to be in place;
- Wallace Collection staff and freelancers have a duty of care to undertake precautions that ensure participants in our online sessions are protected from potential harm.

## **WHAT WE WILL UNDERTAKE TO KEEP OUR PARTICIPANTS SAFE ONLINE.**

- Appoint a Safeguarding Lead and Deputy Safeguarding Lead(s);
- Provide a robust reporting procedure for responding to incidents or concerns of inappropriate behaviour online, whether by hosts or participants;
- Undertake DBS checks for all employees, contractors and volunteers who work with children or adults at risk, and keep appropriate records;
- Provide specific guidance to our staff and freelancers on how to behave and deliver sessions online safely;
- Deliver online sessions with a minimum of two authorised hosts;
- Refuse access to children and adults at risk to online sessions until there is sufficient supervision by at least one responsible teacher, group leader or carer;
- Adhere to the safe use of accounts, logins and passcodes to help ensure only authorised persons can participate in our online sessions;
- Where possible, prevent the ability to record or screengrab online sessions;
- Request that teachers, group leaders and carers read and agree to our online safeguarding policy before participating in our online sessions.

## **WHAT WE EXPECT FROM PARTICIPANTS IN ONLINE SESSIONS.**

- Teachers, group leaders and carers who book our online sessions read and agree to our Online Safeguarding Policy before participating;
- Teachers who book our online sessions read How Our Online Sessions Work guidance before participating;
- Teachers, group leaders and carers encourage participants to use the internet responsibly and show respect for others;
- Teachers and group leaders provide sufficient supervision by being present throughout online sessions in schools (minimum one responsible adult per session);
- Participants aged 0-7 years joining an online session from home must be directly supervised by a responsible adult at all times;
- Participants aged 8-13 years joining an online session from home must have a responsible adult within the same social space of their home at all times;
- Participants aged 14-18 years joining an online session must remain within a social space in their home at all times.
- Online sessions are not recorded and any image capture is not undertaken unless through prior agreement with all participating persons.

## **WHAT WE WILL UNDERTAKE IN THE EVENT OF AN INCIDENT OR CONCERN.**

- Immediately report the matter to the Wallace Collection Safeguarding Lead or Deputy;
- Robustly follow the process set out in the Wallace Collection's Safeguarding Incident or Concern Reporting Procedure;
- Immediately report very serious allegations to the police and relevant agencies;
- Comply with wider safeguarding policies and procedures where appropriate;
- Treat all matters seriously and keep an open mind.

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## **4. INCIDENT OR CONCERN REPORTING PROCEDURE.**

**The following procedures set out the actions that should be taken in response to safeguarding incidents and concerns relating to children or adults at risk.**

### **WHEN THESE PROCEDURES APPLY.**

- When a child or adult at risk discloses an allegation of harm;
- When there is an allegation that any person who works with children or adults at risk, whether employed, voluntary, or who is visiting the museum has:
  - Behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk;
  - Possibly committed a criminal offence against or related to a child or adult at risk;
  - Behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm to children or adults at risk.

### **INITIAL ACTION WHEN RECEIVING OR IDENTIFYING AN ALLEGATION OR CONCERN.**

- The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not:
  - Investigate or ask leading questions;
  - Make assumptions or offer alternative explanations;
  - Promise confidentiality.
- The person to whom an allegation or concern is first reported should complete the Safeguarding Incident or Concern Reporting Form, creating a full record of the information being disclosed or witnessed. This includes:
  - Recording the information in the child/adult's own words;
  - Signing and dating the written record;
  - Immediately reporting the matter to the Wallace Collection Safeguarding Lead, or a Deputy Lead in their absence;
  - Or where the Safeguarding Lead is the subject of the allegation, report to the Deputy Lead(s) or other appropriate senior manager.
- Very serious allegations, should be immediately reported to the police.

### **FURTHER ACTION.**

- The Wallace Collection Safeguarding Lead or Deputy Lead(s) will continue to gather factual information about the incident or allegation. If appropriate, they will also notify the Westminster Safeguarding Children Board and/or Police.

## **GUIDANCE FOR RESPONDING TO A DISCLOSURE.**

- When a child or adult at risk reports an allegation, the initial response from all professionals should be limited to listening carefully to what the child says.
  - Show you care, help them open up:
    - Give your full attention and keep your body language open and encouraging;
    - Be compassionate 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 – let them go at their own pace;
    - Recognise and respond to their body language.
  - Show you understand, reflect back:
    - Make it clear you’re interested in what they are telling you.
    - Reflect back what they’ve said to check your understanding – and use their language to show it’s their experience.
  - The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children and adults at risk safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children and adults at risk.
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## **5. ROLES AND RESPONSIBILITIES.**

**It is the responsibility of all Wallace Collection employees, contractors and volunteers to be aware of their obligations in ensuring the safety of children and adults at risk.**

Wallace Collection Designated Safeguarding Leads and Deputy Lead(s) are responsible for:

- Receiving, recording and escalating safeguarding allegations or concerns;
- Assessing information promptly, clarifying or obtaining more information;
- Following the Wallace Collection’s safeguarding reporting procedures;
- If necessary, making a formal referral to a statutory child/adult protection agency;
- Ensuring that policy and procedure is followed on such matters as making a referral; on confidentiality, and on information and data recording and retention;
- Advising on the implementation of necessary safeguards and to review safeguarding policy and procedures.

It is not the responsibility of Designated Safeguarding Leads and Deputy Lead(s) to determine whether an allegation or disclosure is valid.



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## 6. SAFEGUARDING CODE OF CONDUCT.

**This safeguarding code of conduct provides further guidance to not only help protect children and adults at risk, but to help individuals identify and avoid any practices that could be mistakenly interpreted, and which could lead to false allegations or concerns.**

Adhering to this safeguarding code will help to protect the Wallace Collection by reducing the risk of someone either using their role within the organisation to gain access to children or adults at risk in order to abuse or harm them, or to leaving themselves open to allegations of abuse.

When working on behalf of the Wallace Collection with children or adults at risk, all employees, contractors and volunteers are considered to be acting in a position of trust. It is therefore important that they behave in an appropriate manner at all times and follow this code of conduct.

Employees, contractors or volunteer who breach this code of conduct may be subject to the Wallace Collection's disciplinary procedures or have their engagement terminated. Serious breaches of this code may result in a referral being made to the police or to a statutory child or adult protection agency.

### **Wallace Collection employees, contractors and volunteers MUST:**

- Comply with Safeguarding Policies and all related procedures;
- Listen to and respect children and adults at risk;
- Treat children and adults at risk fairly and without prejudice;
- Ensure materials and equipment are used appropriately;
- Ensure any physical contact is avoided, unless appropriate in relation to the nature of a learning session e.g. movement and dance, or in the case of emergencies;
- Ensure language is appropriate, age-sensitive, not offensive, or discriminatory;
- Challenge unacceptable behaviour and report all allegations or concerns;
- Report any breaches of this code to a Designated Safeguarding Lead or Deputy Lead(s).

### **Wallace Collection employees, contractors and volunteers MUST NOT:**

- Put any child or adult at risk;
- Patronise or use inappropriate, offensive or discriminatory language;
- Allow safeguarding allegations or concerns to go unreported;
- Develop inappropriate relationships with children or adults at risk;
- Share personal telephone numbers or email addresses, or make contact of a personal nature via social media, with children or adults at risk;
- Behave in a way that can be perceived as bullying, threatening or intrusive;
- Exaggerate or trivialise safeguarding issues or concerns;
- Take photos or film children or adults at risk without express parent or carer permission.

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## 7. APPENDIX I – DEFINITIONS.

- **Children** are defined as young people under the age of 18;
- **Adults at risk** are defined as people over the age of 18 who are, or may be in need of, care services because of age, illness, physical or learning disability, or those who are unable to take care of or protect themselves against harm or exploitation, including those for whom English is an additional language;
- **Supervising adults** are defined as people over the age of 18\* who assume responsibility for children or adults at risk, including teachers, parents, carers and group leaders;
- Regulated activity with children is defined as:
  - Teaching, training, instruction, care, supervision or advice without a supervising adult;
  - Work that is carried out in an educational institution, pupil referral unit, nursery education provider, detention centre, children’s home, children’s centre or childcare premises without a supervising adult.
- Regulated activity with adults, which would determine them as at risk, is defined as:
  - the provision of health care or of personal care;
  - the provision of social work;
  - assisting with household matters or with the conduct of an adult’s own affairs;
  - conveying.

\*some parents or carers may be under the age of 18 and may be responsible for children or adults at risk.

## 8. APPENDIX II - INCIDENT OR CONCERN REPORTING FORM.

Date and time of incident /concern	
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### YOUR DETAILS

Name		
Role / relationship to the person		
Address		
Email		
Phone number		
Are you reporting your own concerns or responding to concerns raised by someone else?	<input type="checkbox"/>	Reporting my own concerns
	<input type="checkbox"/>	Responding to concerns raised by someone else
If you are responding to concerns raised by someone else, please state their name and role/relationship to the person		

### DETAILS OF PERSON AND PARENT(S) OR CARER(S)

Name of person		
Gender		
Age and date of birth		
Ethnicity		
Additional needs		
Name of person's parent(s) or carer(s)		
Person's address and address(es) of parent(s)/carer(s)		
Have you informed the person's parent(s) or carer(s)?	<input type="checkbox"/>	Yes
	<input type="checkbox"/>	No
If yes, summarise what was discussed		
If no, state the reason for this		



## ACTION TAKEN

Have you informed the Wallace Collection Safeguarding Lead?	Yes
	No
If yes, summarise when this took place and what was discussed	
After discussion, do you still have safeguarding concerns?	Yes
	No

Have you informed external agencies about the incident or concern?	Yes - please record details of external contact below
	No
Name and address of agency contacted	
Name of person you spoke to	
Email	
Phone number	
Detail the action agreed, or advice given, by the external agency	
What has happened since referring to the external agency? Include the date and details of all relevant action and follow-up	

## DECLARATION

By signing this form, I certify the information recorded is true and correct to the best of my knowledge.	
Name	
Signature	
Date completed	