



## Part 1: Safeguarding Policy and Procedures – Guidelines to protect our Service Users

<p><b>1. Introduction</b></p>	<p>Music24 makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.</p> <p>Music24 comes into contact with vulnerable adults through the following activities: music making, music therapy in a group setting and/or individual sessions. We specialise in offering social/well-being activities. We do not provide personal care.</p> <p>The types of contact with vulnerable adults will be under the auspices of Music24’s Trustees or their appointed representatives on a daily basis.</p> <p>This policy seeks to ensure that Music24 undertakes its responsibilities regarding the protection of vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation’s expectations.</p>
<p><b>2. Legislation</b></p>	<p>The principal pieces of legislation governing this policy are:</p> <ul style="list-style-type: none"> <li>• Safeguarding Vulnerable Groups Act 2006</li> <li>• The Care Act 2014</li> <li>• Disclosure &amp; Barring Service 2013</li> <li>• The Equality Act 2010</li> <li>• Mental Capacity Act 2005</li> <li>• Sexual Offences Act 2003</li> <li>• NHS and Community Care Act 1990</li> <li>• Rehabilitation of Offenders Act 1974</li> <li>• The Data Protection Act 2018</li> </ul>
<p><b>3. Definitions</b></p>	<p>Safeguarding is about embedding practices throughout the organisation to ensure the protection of vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.</p> <p>Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of</p>



	<p>authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:</p> <ul style="list-style-type: none"> <li>• Physical abuse</li> <li>• Sexual abuse</li> <li>• Emotional abuse</li> <li>• Bullying</li> <li>• Neglect</li> <li>• Financial (or material) abuse</li> </ul> <p><b>Definition of Vulnerable Adults</b> A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.</p> <p>This <b>may</b> include a person who:</p> <ul style="list-style-type: none"> <li>• Is elderly and frail</li> <li>• Has a mental illness including dementia</li> <li>• Has a physical or sensory disability</li> <li>• Has a learning disability</li> <li>• Has a severe physical illness</li> <li>• Is a substance misuser</li> <li>• Is homeless</li> </ul>
<p><b>4. Responsibilities</b></p>	<p>The <b>Designated Safeguarding Officer</b> for Music24 CIO is <b>Graeme Davis</b>.</p> <p><b>All staff &amp; volunteers</b> have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.</p> <p>We expect all staff &amp; volunteers to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.</p> <p><b>Additional specific responsibilities</b></p> <p>The trustees of Music24 have responsibility to ensure:</p> <ul style="list-style-type: none"> <li>• The safeguarding of vulnerable adults at all times;</li> <li>• The policy is in place and appropriate</li> <li>• The policy is accessible</li> <li>• The policy is implemented</li> <li>• The policy is regularly monitored and review annually</li> </ul>



	<ul style="list-style-type: none"> <li>• Keep up to date with local arrangements for safeguarding and DBS regulations</li> <li>• Ensure that key staff develop effective links with relevant agencies</li> <li>• Identify and report serious incidents to the Charity Commission</li> </ul>
<p><b>5. Implementation Stages</b></p>	<p>The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:</p> <p><b>Safe recruitment</b>                  Music24 ensures safe recruitment through the following processes:</p> <ul style="list-style-type: none"> <li>• Complaints policy and procedure to ensure quality of service provision.</li> <li>• Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory.</li> <li>• Data protection (how records are stored and access to those records).</li> <li>• We will verify the qualifications and professional registrations of all potential employees, prior to them starting employment, where they are in a role with a Safeguarding risk.</li> </ul> <p><b>DBS checks</b>                  The organisation commits to providing Disclosure &amp; Barring Service (DBS) checks on all staff (paid or unpaid) whose roles involve contact with vulnerable adults.</p> <p><b>Service delivery - contracting and sub-contracting agreements:</b></p> <ul style="list-style-type: none"> <li>• There will be systematic checking of safeguarding arrangements of partner organisations</li> <li>• Safeguarding will be a fixed agenda item on any partnership reporting meetings.</li> <li>• Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.</li> </ul>



<p><b>6. Professional boundaries</b></p>	<p>Professional boundaries are what define the limits of a relationship between Music24 staff and its service users. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.</p> <p>Music24 expects staff to protect the professional integrity of themselves and the organisation. The following professional boundaries must be adhered to:</p> <ul style="list-style-type: none"> <li>• Giving and receiving gifts from clients: Music24 does not allow paid or unpaid staff to give gifts to or receive gifts from clients.</li> <li>• Personal relationships between a member of staff (paid or unpaid) and a client who is a current service user is prohibited. This includes relationships through social networking sites such as Facebook and Twitter. It is also prohibited to enter into a personal relationship with a person who has been a service user over the past 12 months.</li> </ul> <p><b>Music24's Code of Conduct:</b></p> <ul style="list-style-type: none"> <li>• Do not use aggressive or abusive language</li> <li>• Maintain a professional manner to inappropriate behaviour / language</li> <li>• Do not use punishment or chastisement</li> <li>• Do not pass on service users' personal contact details</li> <li>• Do not accept responsibility for any valuables on behalf of a client</li> <li>• Do not accept money as a gift or borrow money from or lending money to service users</li> <li>• Where possible, be cautious and/or avoid all personal contact with clients</li> </ul> <p>If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation using our complaints policy and procedure.</p>
<p><b>7. Reporting</b></p>	<p>The process for raising and reporting safeguarding concerns at Music24 should be directed to the Chair of Trustees of Music24, Tom Johnson.</p> <p><b>Actions for the chair of Trustees:</b></p> <ul style="list-style-type: none"> <li>• Complete the Local Authority Safeguarding Vulnerable Groups Incident Report Form if required and submit to the local authority within 24 hours of making a contact.</li> <li>• Ensure that feedback from the Local Authority is received and their response recorded.</li> <li>• Adhere to local authority safeguarding policies and procedure and implement as appropriate.</li> <li>• Identify &amp; report any serious incident to the Charity Commission</li> </ul>
<p><b>8. Allegations Management</b></p>	<p>Music24 recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation. Please refer to our Complaints Policy &amp; Procedure. This can be obtained by contacting: Music24, The Greenhouse, 16-22 St Thomas' Road, Luton, LU2 7UY.</p>



	<p>Music24 recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), Data Barring Service (DBS) and The Charity Commission accordingly.</p>
<p><b>9. Monitoring</b></p>	<p>The organisation will monitor the following Safeguarding aspects:</p> <ul style="list-style-type: none"> <li>• Safe recruitment practices</li> <li>• DBS checks undertaken</li> <li>• References applied for new staff</li> <li>• Monitoring whether concerns are being reported and actioned</li> <li>• Checking that policies are up to date and relevant</li> <li>• Reviewing the current reporting procedure in place</li> <li>• Awareness of local policies are up to date with any amendments</li> <li>• New risk assessments should be carried out if/when this policy is changed</li> </ul>
<p><b>10. Managing information</b></p>	<p>Information will be gathered, recorded and stored in accordance with our Data Protection Policy. All staff must be aware that they have a professional duty to share information with other relevant agencies in order to protect vulnerable adults. The public interest in safeguarding vulnerable adults may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by the Trustees of Music24.</p> <p>All staff must be aware that they cannot promise service users or their families/carers that they will keep secrets.</p>
<p><b>11. Communicating and reviewing the policy</b></p>	<p>Music24 will make the Safeguarding Policy and Complaints Policy &amp; Procedure available through the following means:</p> <ul style="list-style-type: none"> <li>• Hard copy, by request</li> <li>• Hard copy in Large Print, by request</li> <li>• Electronic Copy, by request</li> </ul> <p>This policy will be reviewed by the Trustees annually and when there are changes in legislation. They will also document cases accordingly.</p>
<p><b>12. Online Working</b></p>	<p>Working online is now a huge part of our daily working lives. Music24 staff and volunteers should consider the following when providing our services online.</p> <ul style="list-style-type: none"> <li>• Use password protected software wherever possible to avoid/prevent unwanted access to the meeting.</li> <li>• Training is to be provided to all staff on how to use the technology.</li> </ul>



	<ul style="list-style-type: none"><li>• In all group sessions there must be 1 host and at least 1 co-host present to help 'manage' the session technically (muting, admitting participants) and to manage conversations and activities with participants. They are also there to assist with any matters if they arise.</li><li>• Have a clear structure/plan for your session to ensure a smooth-running meeting.</li><li>• Meetings that Music24 hosts for service users should last no longer than 1 hour.</li><li>• Management meetings can run for longer than an hour but should be paced out mindfully and include breaks.</li><li>• Staff members should consider where they sit and what they wear in an online meeting. Staff should also consider how much or how little they wish to share about their personal lives.</li><li>• If sharing screens within a session, staff should make sure they do not disclose any sensitive/confidential information. Screen-sharing can be tested/practiced, if needed, before other members join the meeting. The supporting co-host(s) should bring any urgent matters immediately to the Host's attention and the screen-share function should be stopped immediately until any issues have been resolved.</li><li>• Any breaches of confidentiality or concerns about service users should be reported to the SMT.</li><li>• Hosts and co-hosts should mute participants whenever it feels necessary, e.g. if someone takes a phone call or they answer the door.</li><li>• If recordings take place within a meeting, or people are taking pictures, all participants must be notified. If participants want to remain in the meeting but do not want to be recorded/photographed, it is advised that they turn off their camera facility and use audio only.</li></ul>
--	---



## Part 2: Safeguarding Policy and Procedures – Guidelines to protect our Staff & Volunteers

1. **Bullying and Harassment Policy**
2. **Insurances**
3. **Training & Development Policy**

### Bullying and Harassment Policy

#### 1. Introduction

Music24 is an equal opportunities employer. This means that we will make good faith efforts to comply with the spirit and letter of the equality laws as defined under the Equality Act 2010.

We will promote a good and harmonious working environment in which our employees (paid or unpaid) will be treated with dignity and respect. We will not bully them, nor will we discriminate unlawfully against them or harass them on the “equality grounds”; which are-

<b>Sex</b>	<b>Age</b>	<b>Gender reassignment</b>
<b>Marital or Civil partnership status</b>	<b>Religious or similar philosophical belief</b>	<b>Political opinion</b>
<b>Racial</b>	<b>Sexual orientation</b>	<b>Disability</b>

## 2. What is Harassment?

Harassment is unwanted conduct related to the equality grounds which damages, or which is done with the aim of damaging, a person’s dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

There are many different forms of misbehaviour that may amount to harassment; examples include:

- Physical conduct such as assaulting a person or making obscene gestures.
- Verbal conduct such as making racist, sexist, sectarian or homophobic remarks; making derogatory comments about a person’s age or disability; or singing songs of this nature.
- Visual or written material containing racist, sexist, sectarian, homophobic or other derogatory words or pictures (e.g. in posters, graffiti, letters or emails).
- Isolating a person or refusing to co-operate or help them at work or by excluding them from work-related social activities.
- Forcing a person to offer sexual favours or to take part in religious or political activities.
- Spreading malicious rumours, or insulting someone by word or behaviour
- Overbearing supervision or other misuse of power or position



### **3. What is Bullying?**

Bullying is similar to harassment in the sense that it too is offensive, hostile or oppressive behaviour. The main difference is that bullying behaviour need not be related to the equality grounds, but may be done for other reasons, such as jealousy or personal dislike or revenge or insecurity.

### **4. Implications of Harassment & Bullying**

Harassment and bullying can damage the health, confidence, morale and performance of employees who are affected by it. Harassment is unlawful under the equality laws. Harassment and bullying may also be civil or criminal offences and may contravene health and safety law.

Quite apart from the legal implications, both harassment and bullying are contrary to the standards of behaviour that we expect of our employees. Both types of behaviour are unacceptable in our workplace and are not permitted or condoned. We will treat such behaviour as misconduct which may warrant disciplinary procedures or dismissal from employment.

### **5. Employees' Rights**

Our employees have a right to work in a good and harmonious environment that is free from harassment and bullying and to complain about such behaviour should it occur.

We have established an internal grievance procedure to deal with such complaints and we would encourage aggrieved employees to use it. All complaints will be dealt with seriously, promptly and confidentially. Please speak to a senior member of staff for more information. Our Complaints Policy & Procedures is available on request.

Employees who make complaints, and others who give evidence or information in connection with such complaints, will not be victimised (i.e. they will not be discriminated against, harassed or bullied in retaliation for their actions). Victimization is also discrimination contrary to the equality laws and this policy. We will treat it as misconduct which may warrant dismissal from employment.

### **6. Employees' Responsibilities**

All our employees must comply with this policy. They must treat each other with dignity and respect. They must not themselves commit any acts of harassment or bullying against any person, such as their co-workers or our service users. Such behaviour will not be permitted or condoned. We will treat it as misconduct which may warrant dismissal from employment.

All our employees should discourage harassment and bullying by making it clear that they find such behaviour unacceptable and by supporting co-workers who suffer such treatment. Any employee who is aware of any incidence of harassment or bullying should alert the senior management to enable us to deal with it effectively.

### **7. Employer's responsibilities**

We will continually make good faith efforts to implement this policy. The main responsibility for this will be carried out by **Teela Hughes**, but, all senior staff have a special responsibility for enforcing this policy on a day-to-day basis, especially in setting a good example for other employees to follow and for intervening where necessary to protect and reassure employees.

To implement this policy, we will:

- provide all employees, including volunteers, and senior staff with a copy of this policy and explain it to them.
- provide appropriate training to senior staff to help them fulfil their role.
- ensure that all complaints of harassment and bullying are dealt with promptly, seriously and confidentially and in accordance with our internal grievance procedure.
- set a good example by treating employees with fairness, dignity and respect.
- be alert to unacceptable behaviour and take appropriate action to stop it wherever necessary.
- monitor all incidents of harassment and bullying and review the effectiveness of this policy periodically.

### **4. Insurance**

## Insurances

1. In accordance with Charity Commission’s guidance (CC49), Music24 subscribes to the following insurances:
  - 1.1 Employer’s Liability Insurance limit of indemnity £10,000,000
  - 1.2 Public Liability Insurance, limit of indemnity £5,000,000
  - 1.3 Personal Accident
2. Specialist staff, such as Music Therapists, will be required to hold their own personal Professional Indemnity Insurance, where appropriate.
3. All trustees will be covered under our Trustee Indemnity Insurance Policy.

## Training & Development Policy

### 1. Purpose and Scope

Music24 is committed to ensuring that all staff and volunteers have access to learning, development and training opportunities which enable them to be suitably knowledgeable and skilled to carry out their role within the organisation, and to develop their talents in any ways that fits with the organisation’s development to meet its purposes.

### 2. Aims

The main aims of this policy are to: ensure that employees and volunteers are supported and enabled to meet the changing demands of the organisation and its service users so that the organisation achieves its strategic objectives; facilitate staff development and/or personal development through assisting them to broaden, deepen and thereby further enhance their existing skill base; and to provide a working environment where continuous learning and development take place that help staff to gain more enjoyment from their roles, increase motivation and enhance staff retention.

### 3. Equal Opportunities

The organisation is committed to ensuring equality of learning opportunity, hence no employee or volunteer will be excluded from learning on the grounds of gender (including gender reassignment), age, marital status, disability, racial grounds (race, colour, nationality – including citizenship - ethnic or national origin), sexual orientation, religion or belief, responsibility for dependants, trade union membership or employment status. Part time and fixed term employees will have equal access to learning and development opportunities appropriate to their post, and volunteers will be given access to relevant training.

## **4. Responsibilities**

### **4.1 Employees**

Music24 believes that employee development is most effective when the individual employee takes responsibility for identifying any opportunities for self-development, which will enhance work performance through increased skills and knowledge.

Learning needs and opportunities will also be identified through the support, supervision and appraisal process, and through internal assessments to meet business needs.

We expect all employees to also take a proactive approach to furthering organisational wide learning and development.

The Senior Management should be notified of all learning undertaken for inclusion in a central log. This should also include top-level comments on the quality and cost effectiveness of training from participants, which is made available to all staff when considering booking training.

### **4.2 Senior Management Team**

The Senior Management Team are responsible for assisting staff and volunteers to identify learning needs and for ensuring that they review these with staff on a regular basis during support and supervision sessions. The employee's log of learning should also be discussed at these sessions.

They also have a responsibility to monitor and evaluate the effectiveness of learning for employees who have undergone training and development. Managers should seek feedback on any training, including quality and cost effectiveness.

Managers should then ensure that employees implement the skills that they have gained through training and ensure that feedback on training is shared with the organisation via the central log of learning.

### **4.3 Board of Trustees**

The co-ordination of the learning and development process is the responsibility of the Board of Trustees. They will, therefore, ensure that evaluation of learning activities is undertaken annually by liaising with the Senior Management Team to ensure that any identified needs are addressed accordingly.

The Board of Trustees is responsible for agreeing the learning and development budget on an annual basis. Trustees also have a responsibility to attend appropriate training in order for them to perform their legal duties.

## **5. Routes to Learning & Development**

Options for learning & development may include:

- On the job learning including learning from other members of staff via job shadowing, mentoring, in house skill sharing, staff away days etc.
- Secondments and placements/visits to other organisations
- Setting up job development opportunities such as public speaking, in house presentations at team meetings
- Attending internal or external training days/ workshops
- Attending conferences, forums
- An external course of study
- Web based e-learning
- Self-directed study – such as books, manuals, online information

Music24 is committed to sharing the learning and lessons gained by staff and volunteers throughout the organisation. This will be accomplished in a number of ways:

- Giving time in team meetings to share core lessons from training in the form of a debrief
- Networking with partner and same sector organisations and incorporating their literature, reports and research documents into office resource libraries.

## **6. Key Professional and Skills Based Learning**

The organisation aims to prioritise learning that focuses on areas which:

- Enable us to fulfil our strategic objectives
- Pertain to any organisational statutory/contractual obligations
- Are essential in order to generate and maintain income
- Enable effective responses and management of legislative changes
- Ensure IT skills meet business need
- Are essential to ensure the quality of service provision
- Enable employees to meet their responsibilities in completing continuous professional development required by relevant professional bodies, such as HCPC
- Enable management development in relation to those who have managerial/supervisory responsibilities

## **7. Core Learning**

There are specific areas of learning, which are essential for all employees and cover a rolling programme of needs that have been identified as part of a continuous programme of learning and development. Core learning will therefore cover the following areas:

### **7.1 Induction**

All new employees are given a timely programme of induction including introduction to all policies for the organisation. This is an essential part of staff learning and development, and integration into the working environment.

### **7.2 ICT (Information and Communication Technologies)**

It is important that all employees are given opportunities to enhance their ICT skills base. The organisation is committed to ensuring that all employees have competent grounding in the use of ICT in the wider context of their professional roles.

Employees are positively encouraged to become familiar with the internet, email and other electronic facilities and computer software packages at their disposal. Initial information and training will be provided on commencement of the role or when any technology changes occur.

## **8. Recording, Monitoring & Evaluating Learning**

The Senior Management Team are responsible for ensuring that a central record of employee learning is created and maintained, and that all learning and development activities are monitored and evaluated in terms of suitability, effectiveness and value for money.

The Senior Management Team have responsibility for reporting on the effectiveness of any staff development programmes to the Board of Trustees at the AGM.

## **9. Performance Management**

Performance management is an on-going communication process, which involves both the line manager and their employee in:

- Identifying and describing essential job functions and relating them to the strategic and operational objectives of the organisation
- Developing realistic and appropriate performance standards
- Giving and receiving feedback about performance
- Participating in constructive performance appraisals
- Planning learning and development opportunities to sustain, improve or build on employee work performance.

*Regular meetings/communications between staff facilitate this process.*

## **10. Appraisals**

Annual Appraisals are an essential component of Music24's performance management framework and are supported by regular support and supervision sessions between line managers and their employees throughout the course of the year.

The appraisal scheme allows for every employee to be formally appraised through a structured discussion on work performance over the previous year and which, must also incorporate the employee’s learning and development needs for the following year.

It is an opportunity to build on strengths and address areas, which require support, thereby enhancing the potential skill base of the individual employee.

### **10.1 Supervision and Appraisal process:**

Music24 has a culture of effective informal mentoring on an on-going basis; this is based around continuous support. The formal aspects to this however are:

- Session by session service user debriefing
- Regular appraisals
- Personal Development Plans
- Monthly supervision for all Music Therapists

## **Confirmation of reading:**





I confirm that I have been made fully aware of, and understand the contents of, the Safeguarding Policy and Procedures for Music24.

Please complete the details below and return this completed form to Graeme Davis who is our Designated Safeguarding Officer.

**Employee Name:**

**Employee Signature:**

**Date:**