

Safeguarding Policy

Please note; for procedural and general guidance regarding safeguarding see the safeguarding procedures and guidance.

List of Appendices to this document:

Appendix A: Staff Code of behaviour and Good Practice

1. Introduction

This document articulates Art Academy London's commitment to the welfare of all our students, staff, visitors and guests, and in particular our responsibilities to protect vulnerable/ protected groups (children and young people who are under 18, vulnerable/protected adults, and adults at risk*) from any form of abuse during their association with us.

The safety of vulnerable/protected groups is accorded utmost priority and is the shared responsibility of all staff at the Academy. All members of the Academy's community, including vulnerable/protected groups should be free to work, learn and develop their potential without fear of violence, abuse or exploitation within the Academy environment, irrespective of their age, gender, disability, racial origin, religion, belief and sexual orientation; they will be valued and their rights to protection and safety fully respected.

This document also details the measures the Academy will take to minimise the risk of abuse or radicalisation of, or perpetrated by, any member of the Academy's community, and the procedures we will follow in the event of abuse or radicalisation being suspected or becoming evident. The Academy's Prevent Policy and Procedure, which details this further, can be found on our [website](#) or [Moodle](#).

All suspicions and allegations of abuse, or concerns about possible radicalisation will be taken seriously by the Academy and responded to appropriately; this includes referral to appropriate external authorities when required by law or deemed necessary.

* All cohorts will be referred to henceforth throughout this Policy as 'vulnerable/protected groups'

1.1 Expectations

Art Academy London expects that all students, staff, trustees, visitors, contractors and any other people who represent us, will at all times:

- Act in an exemplary manner towards vulnerable/protected groups.
- Take a professional approach to interactions with vulnerable/protected groups, both when face to face and when communicating via email or social media.
- Exercise their judgement to protect the interests and welfare of any vulnerable person.
- Challenge any unacceptable behaviour towards vulnerable people, from whatever source.
- Communicate immediately any suspicions of abuse using the Academy's reporting procedures.

1.2 Definitions of abuse

The following are examples of the types of abuse covered by this Policy; the list is not exhaustive:

- **Physical abuse:** actual or likely physical injury or suffering.

- **Emotional abuse:** actual or likely severe adverse effect on the emotional and behavioural development caused by persistent or severe emotional ill-treatment or rejection.
- **Neglect:** failure to protect a vulnerable person from exposure to danger, or ongoing failure to carry out important aspects of care.
- **Bullying and harassment:** conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual abuse:** actual or likely sexual exploitation, particularly where the perpetrator holds a position of influence and/or trust.

Any of the above list will be regarded as abuse whether perpetrated in the ‘real’ world or by the misuse of electronic means of communication such as email, texting, or social media, including image sharing networks, and the internet in general.

1.3 Definition of ‘radicalisation’

‘Radicalisation’ is defined by UK Government as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. The protection and safeguarding of people who are or may be vulnerable to this process is at the core of the ‘Prevent’ Duty Guidance, under Section 29 of the Counter-Terrorism and Security Act 2015, the provisions of which the Academy, like all other education institutions, must comply.

Art Academy London considers a deliberate attempt to radicalise an individual towards extremist and violent views is itself a form of abuse which can then fuel further abuses. As with other forms of abuse, ‘radicalisation’ can occur both by direct contact and via the use and abuse of electronic means of communication.

The Academy’s commitment to help prevent radicalisation is included within this policy, but is also subject to the guidance contained within the Prevent Policy.

1.4 Definition of ‘child’ and ‘young person’

For the purposes of this Policy, the terms ‘child’ and ‘young person’ are interchangeable and refer to anyone who has not yet reached their 18th birthday.

1.5 Definition of ‘vulnerable adult’

For the purposes of this Policy, a ‘vulnerable adult’ or ‘adult at risk’ is anyone over the age of 18 who requires or receives health care, personal care, social care, assistance with general household matters or with transport due to their age, an illness, or a mental or other disability, or assistance in their welfare or financial matters, and who is unable to protect him or herself against significant harm, abuse or exploitation, including being drawn into terrorism.

A vulnerable adult is defined by the Safeguarding Vulnerable Groups Act 2006 as a person who is aged 18 years or over and who:

- Is living in residential accommodation, such as a care home or a residential special school;
- is living in sheltered housing;
- is receiving domiciliary care in their own home;
- is receiving any form of healthcare;
- is detained in lawful custody (in a prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999);
- is under the supervision of the probation services;
- is receiving a specified welfare service, namely the provision of support, assistance or advice by any person, the purpose of which is to develop an individual’s capacity to live independently in accommodation or support their capacity to do so;
- is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability;
- is an expectant or nursing mother living in residential care;
- is receiving direct payments from a local authority or health and social care trust in lieu of social care services; or
- requires assistance in the conduct of their own affairs.

2. Scope

The Policy applies to all students, staff and Trustees of the Academy, and also to any contractors and volunteers who are carrying out duties on our behalf.

In compiling this policy and associated procedures the Academy has therefore had due regard to provisions in the following legislation:

- The Children Act, 2004 (and later amendments)
- Safeguarding Vulnerable Groups Act, 2006
- Protection of Freedoms Act, 2012
- The Sexual Offences Act, 2003
- Human Rights Act 1998
- Children and Families Act 2014
- Health and Safety at Work Act (HSWA) 1974

and have had due regard to the following guidance from UK Government:

- Safeguarding Children: Guidance for English Higher Education Institutions (DIUS, 2007)
- Special educational needs and disability (SEND) code of practice: 0 to 25 years - Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014.
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015.
- Working together to safeguard and promote the welfare of children; HM Government 2015.

3. Roles and responsibilities

Institutional responsibility for the safeguarding of vulnerable/protected groups, and for ensuring compliance with the 'Prevent' strategy, lies with the Board of Trustees.

The Designated Safeguarding Officer at the Academy is the Director of Academic Quality, Standards and Student Experience who is also the Prevent Coordinator. The Director of Academic Quality, Standards and Student Experience is responsible for liaising with the relevant external parties under both policies. The Principal, on behalf of the Board of Trustees, has overall responsibility for both policies which are put into effect by the Director of Academic Quality, Standards and Student Experience. In the absence of the Director of Academic Quality, Standards and Student Experience, the Director of Operations (Safeguarding Coordinator) shall deputise.

The responsibilities of the Designated Safeguarding Officer include:

- Development and implementation of a Policy and Procedure to safeguard young people and vulnerable adults
- Effective management of safeguarding concerns within the Academy
- Keep a secure central record of all reported safeguarding concerns for a period as outlined in the Academy's data retention schedule
- Ensuring that information about safeguarding is readily available to students and colleagues.
- Acting as a source of support, advice and expertise within the Academy.
- Receive concerns and disclosures made
- Not to investigate allegations themselves or compromise the investigations of other agencies.
- Support and debrief staff, tutors and volunteers and keep them updated on a 'need to know' basis.
- Liaise with other agencies and professionals as necessary, on a 'need to know' basis.
- Ensure records are completed appropriately, filed confidentially and managed in accordance with institutional and national requirements.
- Referring cases to the local safeguarding authority or other agencies, including the Police, as appropriate.
- Document decisions made

All staff have an individual and collective responsibility to ensure that the culture of Art Academy London is one of openness and trust, and to do everything possible to minimise the risk of abuse going unnoticed.

3.1 Training

3.1.1 Staff and volunteers

All new permanent, fixed term and temporary staff (irrespective of duties) are given an induction by the Operations Manager within which a copy of the Safeguarding Policy and accompanying Procedures and Guidance document is issued and special attention drawn to the Academy Safeguarding reporting procedures and types and definitions of abuse. Staff will previously have been alerted to the policy through the staff handbook and they are kept informed of any amendments. Staff are also given a copy of Part One of Keeping Children Safe in Education (2022) guidance and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2020).

All permanent staff are required to complete a level two e-module e-module on safeguarding within the first month of their employment (<https://www.educare.co.uk/courses/safeguarding-young-people/>). These staff will be required to complete a refresher e-module every two years.

3.1.2 Tutors

All new tutors (irrespective of duties) are given an induction by the Director of Programmes or Academic Programme Manager within which a copy of the Safeguarding Policy and accompanying Procedures and Guidance document is issued and special attention drawn to the Academy Safeguarding reporting procedures and types and definitions of abuse. Tutors will previously been alerted to the policy through the tutor handbook and they are kept informed of any amendments. Tutors are also given a copy of Part One of Keeping Children Safe in Education (2022) guidance and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2020).

Tutors (core academic tutors and those teaching young artist courses) are required to complete a level two e-module on safeguarding within the first month of their engagement. (<https://www.educare.co.uk/courses/safeguarding-young-people/>). These tutors will be required to complete a refresher e-module every two years.

3.1.3 Key Safeguarding Staff

Comprehensive mandatory training on safeguarding is provided for staff key to the effective implementation of the Academy's Safeguarding Policy and Procedures (DSO, Safeguarding Coordinator, Academic Programme Manager, Programme Pathway Leaders, Executive Team). This will comprise of a mixture of externally delivered face to face training and e-modules. Face to face training will be delivered by an organisation / trainer with expertise in Safeguarding and be appropriate in level to the requirements of staff roles/ levels of responsibility.

Such Mandatory training will be scheduled every two years. Additional training will be included in the CPD/ staff development schedule as required to address any changes in the legislation or result of any internal reviews and individually identified training needs.

3.1.4 Students

All academic students undergo an induction period where they are given a copy of the Safeguarding Policy and accompanying Procedures and Guidance document and special attention drawn to the Academy Safeguarding reporting procedures and types and definitions of abuse. A summary of the Safeguarding Policy is additionally included in the student handbook and digital copies of Part One of Keeping Children Safe in Education (2022) guidance and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2020) are made available to students through Moodle.

3.1.5 Staff and Tutor Support

Art Academy London recognises that employees (including the DSO and SC) dealing with safeguarding issues may find situations stressful or upsetting. The Academy will ensure that opportunities are provided for staff and tutors to be supported in these circumstances and to talk through any anxieties they may have. Staff and tutors needing support should speak with their line manager.

3.1.6 Trustees

Trustees have ultimate responsibility for approving the Safeguarding Policy and Procedures. Upon appointment Trustees will be given a copy of Safeguarding Policy and accompanying Procedures and Guidance document with special attention drawn to the report procedures and types and definitions of abuse. They are informed of amendments to the policy as part of the policy approval process. They will also be given access to a level two e-module on safeguarding, which they may complete on a voluntary basis for their general knowledge

3.1.7 Resident Artists

Art Academy London rents a number of studios to resident artists within our buildings. All resident artists are required to read and comply with this policy, the supporting Safeguarding Procedures and Guidance document and undergo a DBS check. They are also given a copy of Part One of Keeping Children Safe in Education (2022) guidance and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2020).

3.1.8 Visitors

Any visitors, external hirers or contractors must adhere to the Code of Behaviour and Good Practice (Appendix A). All visitors to the Academy are recommended to read this policy in full and the accompanying Procedure and guidance document, which are publicly accessible via our website. Physical copies are additionally made available in reception and when all visitors sign in they are reminded of the requirement to adhere to it. In order to support this the badges/lanyards that are issued to visitors have a reduced safeguarding statement on the reverse and visitors are asked to confirm that as a minimum they have read this statement as part of signing in as a visitor.

The DSO must be informed if such personnel are going to be present during student focused activities or teaching sessions.

In some instances (where external parties/ visitors will be working directly with students) they will also be required to sign a declaration stating that they/ their employees and volunteers (as appropriate) have had the necessary disclosure and barring checks, and that the organisation has its own safeguarding policy and procedures.

4. Context

Art Academy London's educational environment is primarily for the education of adults, with the exception of those undertaking the 'Young Artist' short courses (all of whom are under 18) and some academic students on the Foundation programme.

Undergraduate programmes

Whilst AAL does not operate any age restrictions on academic programmes, students under the age of 18 are generally **not** admitted to undergraduate programmes due to lack of experience and levels of ability. Since the start of the Academy's validated provision (2019/20), all undergraduate students have been over the age of 18.

Fine Art Foundation

The Fine Art Foundation is a one year pre-degree programme. Students traditionally progress to Foundation programmes from level 3 and will therefore be over 18. As AAL does not operate any age restrictions on this programme (and due to anomalies in birth date ranges used to determine school year groups), it is possible that students under 18 will be accepted on to the Foundation programme. However, as with the undergraduate programmes, under 18s are generally **not** admitted due to lack of experience and levels of ability. Therefore, enrollment of under 18s on the Foundation is rare. Since 2011, when this programme started, there have been a total of three under 18s enrolled. All turned 18 during the first or before the start of the second term.

Certificate programme

Students admitted to the Certificate programme, may (rarely) be under 18 if they are able to demonstrate an appropriate level of experience and ability. The nature and scheduling of this programme means that it is not usually feasible or of interest to under 18s. In the past decade that this programme has been running, there has never been anyone under 18 enrolled.

Public courses (evening and weekend classes and summer/ Easter short courses)

In order to participate in public courses (except short courses), students must be 18 or over. Short courses (Easter and Summer) are open to students aged 17 and over.

Young Artist short courses

These courses take place at Easter and during the summer. All students on these courses are under 18.

The Academy does have a number of academic students who fall into the categories of vulnerable young people or adults.

4.1 Academic Students; Application

The undergraduate, Foundation and Certificate programmes are subject to an application and interview process, as set out in Art Academy London's Admissions policy.

The Academy's application form requires consent from the parent or guardian of any applicant who will be under 18 at enrolment. The Admissions Policy makes clear our commitment to safeguarding potential students under the age of 18 and those from vulnerable/protected groups. In the event of an applicant being made an offer who will not be 18 before the end of their first term at the Academy, the Academic team will carry out a risk assessment of the requirements of the programme of study, to identify any potential issues which may need to be addressed.

The applicant's parent(s)/guardian(s) will be invited to a meeting with the Academic Programme Manager and relevant Programme/ Pathway Leader, to discuss, along with the offer-holder, the extent and limits of support which can be offered by the Academy and the ongoing role of the parent(s)/guardian in being responsible for their child. The parent(s)/guardian(s) written consent that they accept the outcomes of this meeting will be required as a condition of the student taking up her/his place.

All applicants with support needs are strongly encouraged to declare such needs on the application form so that they can be provided during the admissions process and put in place on a permanent basis for those who subsequently take up a place at the Academy. To ensure this information is collected, enrolling students are also asked to complete the 'Student Declaration and Identification of Support Needs' form at induction.

The Admissions Policy also refers to our procedures for the admission of students with unspent criminal convictions. Our application form requires any such conviction to be declared, and we consider the interests, safety and security in relation to both the Prevent Duty as well as the safeguarding of all members of our community when considering such applications.

Interviewers for applicants under the age of 18 have undergone an 'enhanced' Disclosure & Barring Service (DBS) check.

Please see the [Admissions Policy](#) for further details.

4.2 Academic Students; Criminal records

All applicants to academic programmes and those enrolling for evening classes are required to declare any 'unspent' criminal convictions. The consideration of whether such an applicant's admission would pose an unacceptable risk to the Academy's community will be made by a panel of staff, balancing the Academy's duty of care to its students and staff with the need to treat all applicants fairly.

The [Criminal Convictions Policy and Procedure](#) contains detailed information and the procedure for risk assessing applications with a criminal conviction.

4.3 Academic Students; Enrolment

Most students who are under 18 on entry reach the age of 18 within one term of their first enrolment (in the case of the Foundation programme). Whilst there will be 'light-touch' monitoring* of such students until they reach their 18th birthday, no specific extra measures will normally be put in place unless an issue has been disclosed during the application or enrolment process.

**If a student is enrolled who is not due to reach 18 until the following calendar year (i.e. after the end of their first term of study), s/he will meet with the Academic Programme Manager on a regular basis (usually once per week), who will provide support as necessary in light of her/his age. The Academic Programme Manager has undergone a DBS check.*

It is Academy policy that all tutors undergo an enhanced DBS check. Where the student is working in a studio where a model is present it is policy that the tutor shall not leave the student unattended with the model.

4.4 Public Course Students (other than Young Artist short courses)

Public courses have no entry requirements other than age. All enrolling students on public courses are expected to declare their age; those under the age of 18 enrolling onto evening and weekend classes are in breach of the terms and conditions and liable to be removed from the course.

Short courses (Easter and Summer) are open to students aged 17 and over. In these instances the Academy does not act *in loco parentis*; responsibility for their welfare remains with the parent(s) or legal guardian(s). The parents/guardians of such students are required to confirm their acknowledgement of this.

It is likely at points that Academic students and those on evening and short courses will be in the building at the same time, though not during academic teaching hours; usually if the student is undertaking independent study or taking an evening class, weekend or short course. Therefore, in order to ensure the safeguarding of our academic students, as well as DBS Checking all tutors, all individuals enrolling on to our public courses are asked to confirm if they have a criminal record at the point of purchase (a tick box is provided on the booking form). Where potential 'public' students do declare a criminal record, further details will be requested and the level of risk resulting from their attendance assessed in line with our criminal convictions policy. Should it be considered that the individual poses a risk to the safeguarding of our students, they will be prohibited from attending courses at the Academy.

The [Criminal Convictions Policy and Procedure](#) contains detailed information and the procedure for risk assessing applications with a criminal conviction.

4.5 Short Course Students on Young Artist Programme

All enrolling students on young artist short courses are under 18. These courses run at weekends, Easter and Summer. It is usual practice that a teaching assistant is also present. Assistants will also undergo an enhanced DBS check.

Entry to these courses requires the consent of the parent(s)/guardian(s). Further written consent is sought in relation to the collection of students at the end of the day and permission to leave the premises at lunchtime. Students are accompanied by a DBS checked member of staff at all break times in the canteen area. In these instances Art Academy London acts *in loco parentis*.

Where the student is working in a studio where a model is present it is policy that the tutor (or assistant, where relevant) shall not leave the student unattended with the model.

4.6 DBS (Disclosure and Barring Service)

All staff and Trustees have a duty to keep those individuals from vulnerable/ protected groups safe and to protect them from physical and emotional harm. This duty is best exercised through the development of respectful and professional relationships between staff and students and by staff behaviour which demonstrates integrity and good judgement.

Art Academy London will ensure that any member of staff or volunteer who will be undertaking 'regulated activity' with children/ young people as part of their duties is required to have an enhanced DBS check, together with verification of identity using specified documentation.

Regulated activities with children are defined in the Safeguarding Vulnerable Groups Act 2006 as:

- Unsupervised activities with children, specifically teaching, training or instructing; or caring for or supervising children in 'specified places' e.g. schools, care homes. The unsupervised activities must be undertaken regularly (once a week/four times in thirty days) by the same person.
- Providing advice or guidance on wellbeing.
- Driving a vehicle being used to convey children.

This requirement also applies to any student over the age of 16 who may undertake 'regulated activity' as part of a voluntary placement, or liaison/outreach work on behalf of the Academy. It is the responsibility of the Designated Safeguarding Officer to assess whether a DBS check is necessary and to ensure that it takes place if so.

4.7 DBS monitoring responsibilities

It is Art Academy London policy that ALL tutors teaching on academic and public programmes/ courses undergo an enhanced DBS check.

The Academy engages visiting tutors to carry out artistic tutorials. These tutors may only visit once a year and therefore it is not practicable for the Academy to DBS check every visiting tutor. The assessment of whether such tutors will be DBS checked will be determined by reviewing the profiles of the individual students they are due to work with; ie tutors who are due to work with those classified as vulnerable adults or other protected/ vulnerable group will be required to undergo a DBS check. This assessment will be conducted by the Academic Programme Manager.

All resident artists undergo a DBS check.

All employees of the Art Academy London (i.e. office and support staff) are required to undergo a DBS check.

The monitoring and administration of the process is the responsibility of the Operations Manager with assistance from the Academic Programme Manager. All applicable individuals will be required to undergo re-checks every five years. The Academy encourages tutors to use the 'update service' to expedite this process.

4.8 One-to-one tutorials.

Individual/ one-to-one sessions should not be conducted with students under 18/ children or vulnerable adults; a third party must be present (this should be a DBS checked member of staff).

4.9 Field Trips and Educational Visits

Permission is required from the Principal for any educational visit or field trip outside the UK. All other field trips must be approved by the Director of Programmes. A risk assessment which includes the possible risk of harm to a child/young person or vulnerable adult must be approved as part of the authorisation to go ahead with the activity. Permission in writing to participate in the activity is required from the parent(s) or guardian(s) of a student who is under the age of 18 at the time of the activity.

4.10 Photography and filming of protected/ vulnerable groups

No filming or photography of children or vulnerable adults should take place without gaining written permission from the appropriate parent, guardian or carer. The purposes for which any photographic images or film will be used should be clearly explained and outlined on the disclaimer document. All written consent obtained must be placed securely on file.

There is evidence that some people do use activities and events as an opportunity to take photographs or footage of children and/or vulnerable adults, including those with disabilities, with the intention to use them inappropriately or manipulate them.

4.11 Online delivery

All online sessions (both group and individual/ one-to-one) should be prefaced with the clause that recording the session in any manner (audio, video, screen-grabs) is prohibited, unless permitted by the tutor. Where the tutor allows recording all participants must give full consent for its intended use (whilst most recordings will be for internal use, specifically to allow students to revisit or catch up on sessions, in some instances screen grabs or other recordings may be used for marketing purposes). Verbal consent is sufficient (for vulnerable adults it may be necessary to seek consent from a guardian, where appropriate).

When children (anyone under the age of 18) are participating in online sessions, all recording is prohibited where that recording includes the child's image and/or voice. In these instances, all participants are required to have their camera on (so that all activity is transparent and can be monitored). Any participant who refuses to do so will be removed from the session. Children will ideally be in a public area of the house and an adult will be present within the home.

Individual/ one-to-one sessions should not be conducted with children or vulnerable adults online; a third party must be present (this should be either the parent/ guardian or a DBS checked member of staff).

Where a session is being live-streamed on open social media channels (as part of marketing or out-reach activities) participating children and vulnerable adults must be accompanied by a parent/ guardian for the entire session. In these instances all participants must be made aware that the session is publically available and AAL can not take responsibility for any resulting recordings made by viewers without consent.

In all instances of online delivery, participants should display their full name as their ID, be appropriately dressed and reminded that the chat function is to be used to communicate with tutors and peers about learning in a professional and respectful way. It should not be used informally as on social media. Non-compliance to these rules may result in removal from the session.

5. IT use

Art Academy London's IT User Policy defines unacceptable use of its IT facilities and network. It also details possible consequences of breaching the IT User policy and should be read in conjunction with this policy.

6. PREVENT

As with the safeguarding of vulnerable/ protected groups, it is not for members of staff to decide whether a student has become radicalised, or to try to deal with the situation themselves. Staff should however take note of any signs of change in demeanour or attitude which, in their judgement, causes them to suspect that an individual, whether a student or a fellow member of staff, may be vulnerable to radicalisation, and discuss those concerns as soon as possible with the Prevent Coordinator.

If there is grave or immediate concern of danger to life, the correct procedure is to call 999 and then inform the Prevent Coordinator.

The [Prevent Policy](#) details the actions taken in such cases.

7. Records of allegations or disclosures of abuse

Accurate written records must be made of the material facts and circumstances relating to any allegation or disclosure of abuse, or concern about possible radicalisation. A form appropriate to the type of incident must be completed, which will be the basis for any onward referral to the Police, Local Authority Designated Officer (LADO), or the Disclosure and Barring Service (DBS)

All records of allegations or disclosures, together with any additional notes, will be held securely by the Designated Person(s) dealing with each case. Apart from the Designated Person(s), they may only be shared with the Principal, a designated HR representative, and any legitimate investigating authority.

Records of allegations and disclosures will be held for an appropriate period in accordance with the Academy's Record Retention Schedule and any statutory requirements for the retention of such data.

8. Information Sharing & Confidentiality

All information concerning students and staff will be stored securely and in compliance with the Data Protection Act 2018 (DPA 2018) and General Data Protection Regulations (GDPR). Records will be kept, archived and destroyed in accordance with Art Academy London's Record Retention Schedule.

Children/young people have the same rights to confidentiality as adults under the DPA 2018 and GDPR, and the Academy will always try to obtain a child/young person's permission to share any information about them. However, these rights may be overridden if necessary to safeguard a child/young person from harm.

The Academy will share information about students and staff with legitimate authorities such as the Police, Social Services, Local Safeguarding Children Boards, Local Safeguarding Adults Boards, and the local 'Channel' panel, if required to do so by law or statutory guidance.

9. Monitoring & Review

The Director of Academic Quality, Standards and Student Experience will prepare an annual report for the Board of Trustees which will summarise any issues and actions taken relating to safeguarding.

This document, plus any briefing/guidance documents issued to staff and students will also be reviewed annually by the Director of Academic Quality, Standards and Student Experience, to ensure that any amendments to current legislation and statutory guidance, or changes to institutional needs, are incorporated in a timely way and brought back to the Board of Trustees on at least an annual basis for approval. Any changes made at annual review will be reported to the Executive Team and the Academic Board.

Policies and documents that supplement and reference this document:

Safeguarding Procedures and Guidance
IT User Policy
Equality and Diversity Policy and Strategy
Student Support and Guidance (including Tutoring Policy)
Prevent Policy
Student Handbook
Staff Handbook
Tutor Handbook
Moodle guide
Data Protection Policy
Criminal Convictions Policy and Procedure
Code of Practice - Off Campus Activities

Document name	Safeguarding Policy	Document owner	Darren Nairn
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Version	6	Review date	July 2022
Author of amendments	Darren Nairn	Next review date	July 2023
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Approved by	Board of Trustees	Date of approval	July 2022

Appendix A - Staff Code of behaviour and Good Practice

Art Academy London's Code of Behaviour and Good Practice is intended not only to safeguard protected/ vulnerable groups from harm but also to ensure that staff, tutors, students, volunteers and visitors are not put in a position where their conduct or integrity can be questioned/ misinterpreted or lead to false allegations.

Anyone organising activities on behalf of the Academy, involving protected/ vulnerable groups, must adhere to this code as set out below:

1. All young people and vulnerable adults should be treated with respect.
2. Respect should be given to an individual's right to personal privacy.
3. Physical contact with a young person or vulnerable adult may be misinterpreted and should be avoided. Where any physical touching is required for purposes of instruction, it should be provided openly in front of other students. Parents, guardians and students will be warned in advance that physical touching may be required for correctional purposes only.
4. Feedback should always be constructive rather than negative, and language used should never be threatening or upsetting.
5. Private or unobserved contact with a young person or vulnerable adult should be avoided wherever possible unless for a known and legitimate reason i.e for a one-to-one tutorial.
6. Individuals with special educational needs / disabilities may be especially vulnerable to abuse and extra care should be taken to interpret apparent signs of abuse or neglect. They may be disproportionately impacted by behaviour such as abuse or bullying without outwardly showing any signs through communication barriers.
7. Assumptions should not be made that indicators of abuse (e.g. behaviour, mood and injury) relate to an individual's disability or learning difficulty without further exploration.
8. If first aid is required, where possible, it should be administered by a trained first aider in the presence of another adult. A First Aider will complete a Safeguarding Referral Form if they have any safeguarding concerns as a result of administering the first aid.
9. Written parental or guardian consent should always be obtained for the use of any photographs, film or videos involving young people and vulnerable adults. This should clearly indicate the uses to which the photographs, film or videos will be put.
10. All members of the Academy community and visitors, where appropriate, should challenge unacceptable behaviour in accordance with the provisions of this code of conduct and good practice.
11. Any incidents, allegations or suspicions of abuse should be reported immediately to the DSO, as per the reporting guidelines laid out in this document.
12. In all dealings with children and vulnerable adults, staff, tutors, students, volunteers and visitors, where appropriate, should never:
 - leave children who are in their care unsupervised on Academy premises
 - share a room overnight with a young person or vulnerable adult
 - (if on a residential trip) enter the private room of a young person or vulnerable adult unless it is absolutely necessary and, wherever possible, accompanied by another adult
 - allow or engage in any form of inappropriate physical activity involving young people or vulnerable adults, or any bullying of a young person/ vulnerable adult by an adult or another young person/ vulnerable adult.
 - form or seek to form relationships of a sexual nature which may lead to sexual activity (i.e. 'grooming')
 - allow young people or vulnerable adults to use inappropriate language (e.g. of a derogatory or sexually explicit nature) without challenging it
 - make sexually suggestive or discriminatory comments even in jest
 - intentionally reduce a young person or vulnerable adult to tears as a form of control
 - use any physical punishment as part of discipline
 - shout or use harsh criticism

- consume alcohol or take drugs during the working day (including breaks) or when involved in activities with students
- give their personal contact details to a student whom they have met through work including via social networking sites
- allow themselves to get into a situation where an abuse of trust may occur – this means not forming a close personal relationship (sexual or otherwise) with a student, even if they are seeking and are consenting to such a relationship
- transport a young person or vulnerable adult in a personal vehicle unless consent has been given by a parent or guardian – where this is necessary in an emergency, a DSO must be informed
- allow allegations made by a child or vulnerable adult to go unrecorded or not acted upon in accordance with the procedures outlined in the Safeguarding Procedures
- undertake personal activities (such as washing or dressing) for an individual which they can do for themselves. If an individual has a disability, such tasks should only be performed with the full understanding and consent of and, where appropriate, assistance from the parents or carers. A vulnerable adult may be able to give their own consent.