Safeguarding Policy, Code of Practice, Procedures and Safer Recruitment

Safeguarding action takes priority over internal reporting hierarchy. Any practitioner may refer directly to children's social care or contact the police where necessary; failure to reach the DSL must not delay action.

Staff must not investigate allegations themselves.

Last Reviewed	19th September 2026
Last Updated	19th September 2026

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If you have a concern about a child, young person or vulnerable adult, you must report your concern as soon as possible to the DSL.
Call 999 if a child may be in immediate danger.

Methods of Reporting:

1) In Person
2) By email: admin@bromley-conservatoire.co.uk
3) Through completion of a Concern Form on the website

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Safeguarding Policy Statement

Review status: September 2026 revision. Yellow highlight identifies new or materially amended policy text.

Bromley Conservatoire is the trading name for Apollo Learning Ltd. and is an organisation dedicated to providing music, tuition, drama and arts education to the public. It is a private out-of-school education provider. KCSIE 2026 primarily sets legal requirements for schools and colleges; Bromley Conservatoire adopts relevant provisions as good practice alongside the DfE out-of-school settings guidance. Statutory duties are applied only where the law extends to Bromley Conservatoire. This policy and its guidelines are specifically directed towards children.

For this policy, a child is defined as anyone under the age of 18.

All tutors and staff employed or contracted by Bromley Conservatoire must adhere to this policy and its guidelines. In their roles at Bromley Conservatoire, teachers and staff will frequently interact with children.

Bromley Conservatoire recognises its duty to uphold the highest standards of conduct and best practices concerning child safety. It also understands that robust safeguarding and child protection policies not only protect children but also safeguard Bromley Conservatoire teachers and staff from misunderstandings or inaccurate accusations.

Bromley Conservatoire is dedicated to implementing practices that shield children from harm. We believe that everyone has a duty to promote the welfare and safety of all children and young people, ensuring they are protected in all aspects, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

All Bromley Conservatoire tutors and staff who interact with children must:

- Acknowledge and accept their duty to protect any children under their care and within their professional scope.
- Cultivate an understanding of the issues that can harm children and be able to identify signs of the four main types of abuse: emotional, physical, sexual, and neglect.
- Be vigilant of 'grooming' behaviours, which are actions taken to befriend children as a precursor to abuse.
- Promptly report any concerns following Bromley Conservatoire's established procedures for reporting safeguarding issues.

Bromley Conservatoire commits to protecting children by:

- Implementing a Safeguarding Code of Practice for all Bromley Conservatoire tutors and staff.
- Implementing a procedure for reporting safeguarding concerns.
- Reporting any concerns to the appropriate authorities.

Safeguarding Policy

Bromley Conservatoire's policy includes the following points:

1. All staff and tutors at Bromley Conservatoire are responsible for the welfare of children they interact with during their work and must report any concerns regarding a child's well-being or another individual's behaviour, following established procedures.
2. A Designated Safeguarding Lead (DSL) at Bromley Conservatoire is responsible for acting on any raised concerns, ensuring clear lines of responsibility for child protection.
3. The DSL must maintain current knowledge of local safeguarding thresholds and referral routes, make and follow up referrals without delay, coordinate secure safeguarding records, ensure training and policy implementation, and arrange a trained and contactable deputy or documented alternative arrangements.
4. All Bromley Conservatoire staff and tutors in contact with children during their work at Bromley Conservatoire must follow the **Bromley Conservatoire Code of Behaviour** and the Safeguarding Reporting Procedures outlined in this policy, along with any other relevant guidance issued by Bromley Conservatoire.
5. Bromley Conservatoire is dedicated to safer recruitment through stringent practices detailed in the safer recruitment policy and procedures.
6. Information about any allegation or disclosure should be recorded clearly and promptly, with established procedures dictating who records this information and the timelines for passing it on.
7. According to the Children Act 1989, the 'welfare of the child is paramount', meaning confidentiality considerations in other situations should not override the need to protect children from harm. Efforts should be made to maintain confidentiality for all parties when an allegation is made and under investigation.

This Safeguarding and Child Protection Policy will be referenced or included in recruitment, training, and policy documents where appropriate. The policy will be made widely available to teachers, staff, volunteers, and parents and actively promoted within the organization. A culture of mutual respect between children and Bromley Conservatoire teachers and staff will be encouraged, with adults setting a good example.

As part of Bromley Conservatoire's duty of care towards children, teachers and staff who encounter child protection concerns in their work will be supported when they report their concerns in good faith.

Bromley Conservatoire Code of Behaviour

This code of behaviour is a policy which outlines the conduct that Bromley Conservatoire expects from all staff working for or with Bromley Conservatoire. This policy applies to all staff, including:

- Managers
- Designated Safeguarding Leads
- Administration Staff
- Receptionists
- Tutors and Teachers
- Volunteers
- Temporary Staff
- Interns and Students
- Contractors and Employees
- Everyone undertaking duties for Bromley Conservatoire (paid or unpaid)

We have created this policy to help us protect children and young people from abuse.

Bromley Conservatoire is responsible for making sure everyone undertaking duties from Bromley Conservatoire has read, understood and agreed to follow the code of behaviour and they understand the consequences of inappropriate behaviour.

The Responsibilities of Teachers, Staff and Volunteers

The following points outline your responsibilities:

- Prioritising the welfare of children and young people
- Providing an environment that is safe for children and young people
    - Ensuring equipment is used safely and for its intended purpose
    - Having good awareness of issues to do with safeguarding and child protection and acting when appropriate.
- Following all our principles, policies and procedures outlined in this document
- Modelling good behaviour for children and young people to follow
- Challenging all inappropriate behaviour and reporting any breaches of the Bromley Conservatoire Code of Behaviour to the DSL (admin@bromley-conservatoire.co.uk)
- Reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures. This includes inappropriate behaviour displayed by an adult or child and directed at anybody of any age.
- Always staying within the law

Respect with Children and Young People

You should:

- Always listen to and respect children
- Set clear behavioural expectations to ensure children behave in a respectful manner towards you
- Value and take children's contributions seriously, involving them in planning activities where possible and appropriate
- Respect a young person's right to personal privacy as far as is possible. If you need to break confidentiality to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

Inclusion and Diversity

- All young people and children must be treated in a fair manner without discrimination or prejudice
- If discrimination or prejudice is witnessed, you should challenge it or report it to the DSL (admin@bromley-conservatoire.co.uk).
- Encourage all children, young people and adults to speak out about behaviour or attitudes that makes them uncomfortable in any way.
- Understand that children and young people have individual needs and may react differently to teaching styles, behaviour and attitudes.
- Respect all differences in culture, race, religious beliefs, religious systems, ethnicity, disability, gender and sexual orientation.
- Understand that all participants in a group/organisation can bring something different, valuable and unique to the conversation.

Appropriate and Inappropriate Behaviour

The following grid shows compares appropriate behaviour (what you should do) with the inappropriate counterpart (what you should not do).

Appropriate Behaviour What you **SHOULD** do	Inappropriate Behaviour What you **SHOULD NOT** do
Value all children and young people equally	Show favouritism
Be patient with others	Not take into consideration age and learning needs when interacting with children and young people
Exercise caution when discussing sensitive issues with children or young people and involve parents where possible	Discuss sensitive issues that are not related to the organisation e.g. politics, divisive issues, etc.

Ensure your contact with children and young people is relevant to the nature of the activity you are involved in	Engage in conversation and activities that are inappropriate or irrelevant
Ensure wherever possible, there is more than one adult present during activities with children or young people	Encourage parents or other members of staff to leave the room when engaging in activities with children or young people
Follow our policy on one-to-one teaching when alone with children or young people	Prioritise your own teaching preferences over the policy
If spending individual time with children or young people outside of timetabled lessons, ensure other staff members know where you are	Meet with children or young people alone without letting anybody know
Only provide personal care in an emergency and ensure more than one adult is present if possible	Provide personal care either by request or otherwise that is not an emergency
Never engage in behaviour which could be construed as “grooming” a child	Give a child money, presents or favours or talking or behaving in an unprofessional manner around children
If you give a student a car ride, you must inform the DSL as soon as possible	Offer a student a car ride, except in emergencies
Only socialise with children on Bromley Conservatoire premises or Bromley Conservatoire events	Arrange to socialise with children outside of Bromley Conservatoire / Bromley Conservatoire events
Meet with under 18s only at Bromley Conservatoire / Bromley Conservatoire events	Meet under 18s at their home or invite them to your home
Give all students an equal amount of attention and if giving small gifts (e.g. for Christmas) distribute to all of your students	Give specific students special gifts, favours or unnecessary individual attention
Address students by their first, preferred name	Address students by nicknames, pet names, deadnames, last names or names they do not like
Always avoid risk-taking and risky activities to the best of your ability	Take unnecessary risks

Set a good example to children and young people by not smoking, drinking alcohol or abusing drugs	Smoke, vape, consume alcohol, use illegal substances or be under the influence of alcohol or illegal substances
Develop healthy, responsible and appropriate relationships with children and young people	Develop inappropriate relationships with children and young people
Avoid making unrealistic promises to children and young people	Make inappropriate promises to children and young people
Aspire to be a respectful, responsible and approachable member of staff	Engage in abusive, threating or intrusive behaviour or act in a way that could be perceived as such
Report any form of sexual contact with a child or young person that you witness or hear of to the DSL	Engage in any form of sexual contact with a child or young person
Communicate with children or young people only in-person at Bromley Conservatoire, via digital reports or via the child or young person's parent	Let children and young people have your personal contact details (including mobile number, email address and postal address)
Report any attempts by a child or young person to contact you via social media	Contact a child or young person via social media
Support and encourage children and young people	Patronise or belittle children and young people
Use language and gestures that are respectful, non-biased and inclusive	Make comments or gestures that are, or could pe perceived as, sarcastic, insensitive, sexually suggestive or derogatory

Guidance on Mobile Phones, Cameras, IT and Digital Communication

- Do not take images or videos of children and young people on a personal device. This includes taking images or videos of non-identifiable features of a child or young person e.g. hands, throat, arms, posture or stance.
- Do not accept any images or videos of children or young people from parents or carers. If you receive any images or videos of children or young people, please report this to the DSL (admin@bromley-conservatoire.co.uk) as soon as possible.
- If taking a video or image of a child or young person is required for teaching and learning, please use their parent or carers device. A device may be able to be provided by Bromley Conservatoire on request.

- Do not give out your contact details to children or young people in any circumstance, except for emergency, in which case the DSL (admin@bromley-conservatoire.co.uk) must be informed.
- Do not communicate with children or young people directly via any form of digital communication. This includes text, instant messaging, phone call, video call, email and social media. If there is an exceptional circumstance, prior consent from the child or young person's parent or carer must be obtained and the DSL (admin@bromley-conservatoire.co.uk) informed. If electronic communication is necessary, you must communicate directly with the parent/carer or, more appropriately, via the Bromley Conservatoire email address (admin@bromley-conservatoire.co.uk), which will act as an intermediary.
- For guidance regarding online lessons, please see the online lessons policy in this document.
- Online safety includes grooming, child sexual exploitation, harmful contact, coercion, cyberbullying, exposure to harmful content and the creation or circulation of AI-generated intimate imagery. Children must not be instructed to create, access, share or retain sexualised material.
- Do not copy or forward suspected illegal images; preserve available non-image evidence and seek urgent DSL/police advice.

Internet Filtering and Online Safety

Bromley Conservatoire operates network-level internet filtering to help maintain a safe and appropriate online environment for children, young people and staff. Access to websites and online content in the following categories is blocked across our network, including for teachers, staff and students:

- Games
- Gambling
- Pornography
- Drugs, Alcohol & Tobacco
- Hate & Self-harm

These restrictions apply to all devices connected to Bromley Conservatoire's network. Filtering is intended to reduce exposure to inappropriate or harmful content and does not replace the responsibility of staff to supervise children's internet use appropriately. Any concerns regarding online safety or attempts to circumvent these restrictions must be reported to the Designated Safeguarding Lead.

One-to-One Teaching

It is important that teachers and tutors are aware of the risks associated with teaching children and young people alone.

It is good practice for another person to be able to view a one-to-one lesson at any time. For this reason, we have the following requirement in place:

Teachers and tutors are required to allow their student's parent or carer to sit in the room for the duration of the lesson. Teachers and tutors must not state or imply anything to the contrary.

This requirement also includes group classes that consist of only one student.

T**eachers must not adjust lesson times without agreement in advance with a director or member of the Bromley Conservatoire administration team.**

Supervision and Collection: All staff must adhere to Bromley Conservatoire's *Supervision and Collection Policy*, which sets out the requirements and procedures for supervising children, authorised collection, independent departure, late collection and missing children.

Physical Contact with Students

It is important that teachers, tutors, students, children and young people are clear about safe and appropriate physical contact. It is important for teachers and tutors to feel confident and comfortable in creating and providing a safe and caring environment for all students, especially children and young people.

Acceptable and unacceptable physical contact with students

There are only a small number of circumstances where physical contact between a teacher or tutor and a student is acceptable. Physical contact should only occur when it is absolutely necessary and in line with the Bromley Conservatoire guidelines on safe physical contact with children and young people.

Teachers and tutors should be mindful of the power imbalance between a teacher and a student. A child may feel they cannot say no when permission is sought, even if a parent is present. It is for this reason physical contact should be avoided unless absolutely necessary.

Physical contact may be required in the following situations:

- To avoid accident in an emergency
- To protect from imminent danger
- If a young child needs assistance or comfort after a fall or injury
- Holding the hand of a young child at the front or back of a group when supervising the move between teaching locations or event venues

Physical contact should be avoided when teaching or tutoring unless absolutely necessary.

Physical Contact When Teaching or Tutoring One-to-One

When teaching or tutoring one-on-one, physical contact should never occur under any circumstances. Physical contact in this situation would be inappropriate. The only exception is to use physical contact to avoid accident in an emergency.

If physical contact occurs in any circumstances, you must report it to the DSL (admin@bromley-conservatoire.co.uk).

Teachers or tutors may feel they need to make physical contact with a student to demonstrate a technique or to enhance learning. Other strategies must be used, such as demonstration, clear instruction or use of a mirror.

If a parent or carer is present in a one-to-one lesson, you can consider it a group setting and refer to the "Physical Contact When Tutoring or Teaching in a Group Setting". Teachers and Tutors must seek verbal permission from both the parent or carer and the child or young person.

Physical Contact When Teaching or Tutoring in a Group Setting

Tutors and teachers should adhere to the following when teaching in a group setting:

- Be aware of how you physically interact with students as your actions could be misinterpreted. If a child shows discomfort with being touched, always modify your behaviour accordingly.
- Avoid touching a child below the shoulder unless there is a valid reason.
- Do not assume a child desires physical contact, even with very young children. Use your professional judgment in specific situations, considering the child's needs, age, developmental stage, gender, ethnicity, and background. Seek verbal permission from the student if possible.
- If you think an incident might have been misunderstood, report it to the DSL immediately.
- Be careful when comforting a distressed child with physical contact. Ensure it is never done in private. Use your professional judgment to comfort or reassure children while maintaining appropriate distance.
- Physical contact should only be used when necessary to help the student with the activity being taught. Always consider alternative ways of demonstrating or explaining first.
- Avoid touching a child around the ribs, chest, or diaphragm to teach breathing techniques.

Tutors or Teachers Responding to Students Making Physical Contact with Them

- Very young children may naturally show affection to teachers physically. However, once children attend classes without a parent or carer, they should be encouraged to express affection without physical contact.
- If a student of any age seeks physical contact or appears to want an intimate relationship with you, always discuss this with the DSL (admin@bromley-conservatoire.co.uk).
- In any situation where a child initiates inappropriate physical contact, it is the adult's responsibility to distance themselves and help the student understand personal boundaries.
- Children of any age may exhibit sexual behaviour. Always remember that inappropriate sexual behaviour could be a sign of abuse.
- Sexual relationships or sexual activity between a member of staff and a child under 19 are prohibited by Bromley Conservatoire. Criminal offences involving positions of trust extend beyond schools, including coaching, teaching and supervision relationships; staff must not assume that a child aged 16-19 can lawfully consent where a relevant position-of-trust offence applies. Refer concerns to the DSL immediately (admin@bromley-conservatoire.co.uk).

Online Teaching

Bromley Conservatoire does not typically offer online teaching or tutoring. However, on occasion online lessons are necessary due to student holiday, sickness, pandemic, etc.

Tutors and teachers must adhere to the Bromley Conservatoire safeguarding policy and code of behaviour when conducting online lessons. Specific guidance for online lessons is outlined below:

- Teachers and tutors must not give out or accept personal contact details to or from children or young people in any circumstance, except for emergency, in which case the DSL (admin@bromley-conservatoire.co.uk) must be informed immediately.
- Online lessons must use a video platform approved by Bromley Conservatoire, with access details arranged through the administration team. Teachers must not use personal accounts or unauthorised channels to arrange or conduct lessons.
- Bromley Conservatoire does not assume that online lessons are recorded. Recording is permitted only using a Bromley Conservatoire-approved platform, with an assessed lawful basis, appropriate privacy information, secure access, defined retention and deletion rules, and approval from management. Teachers must never make personal recordings or screenshots.
- Tutors and teachers must conduct online lessons from Bromley Conservatoire premises unless it is not safe to do so (e.g. pandemic, self-isolation, etc.). If an online lesson is not taking place at Bromley Conservatoire, an administration staff member should be informed.
- Online lessons should be conducted in a professional manner. Tutors and teachers must wear appropriate and professional clothing. Backgrounds must be professional or obfuscated using background filters. No inappropriate items should be in view.

- Online lessons must take place at the approved time and be accurately logged in Bromley Conservatoire's current scheduling system. Any changes require office approval in advance.
- Students should wear appropriate clothing when receiving an online lesson. They should not receive the lesson in their bedroom or any other inappropriate space. Students should not have inappropriate items in view. If a tutor or teacher is concerned that any of the above is being violated, please terminate the call and inform the DSL (admin@bromley-conservatoire.co.uk).
- Students under the age of 18 must have a parent or carer present for the duration of the online lesson. To verify this, tutors and teachers should check in with the parent or carer at the start of the call. If a tutor or teacher is concerned that the parent or carer is no longer present during the call, terminate the call and inform the DSL (admin@bromley-conservatoire.co.uk).
- If a safeguarding incident occurs during the online lesson that causes concern or a teacher or tutor feels at risk of allegation, they should terminate the call and inform the DSL immediately (admin@bromley-conservatoire.co.uk).

Upholding the Bromley Conservatoire Code of Behaviour

You should always follow this code of behaviour to safeguard children, young people, students, tutors and teachers. You should never rely on your reputation or that of Bromley Conservatoire to protect you.

If you have behaved inappropriately, you will be subject to one or more of the following, depending on the seriousness of the situation:

- Disciplinary action
- Immediate termination of your contract
- A report to statutory agencies such as the police and/or local authority child protection services

If you become aware of any breaches of this code, you must report them to the DSL (admin@bromley-conservatoire.co.uk).

If necessary, you should follow our whistleblowing procedure and safeguarding and child protection procedures.

Understanding Abuse and Reporting Concerns

Reporting a Concern

If a child is in immediate danger, you should always call the Police at **999**. A teacher or tutor can report a concern to the Designated Safeguarding Lead (DSL) in the following ways:

- In person

- By email at admin@bromley-conservatoire.co.uk
- By completing a Concern form on the Bromley Conservatoire website

All concerns must be reported to the DSL immediately or as soon as practicable on the same day. The DSL will assess risk promptly and contact children's social care, police or other relevant services without delay when thresholds or circumstances require it. The DSL will record the decision, rationale, referral, advice received, next action, responsible person and follow-up outcome. If the DSL is unavailable or does not act, any staff member must escalate directly to statutory services where appropriate.

Bromley Children and Families Hub can be contacted using its professional referral portal; for an immediate concern call 020 8461 7373 / 7379 (office hours), or 0300 303 8671 (outside office hours). Email: candfhub@bromley.gov.uk.

All teachers, tutors, staff, and volunteers should:

- Be alert to signs of four types of abuse (physical, sexual, emotional, and neglect) and report concerns to the DSL (admin@bromley-conservatoire.co.uk).
- Take any disclosure of abuse from a child seriously.
- Follow the Bromley Conservatoire procedures for responding to and reporting allegations of abuse against an adult or a child. Notify Bromley Conservatoire of any changes to their circumstances that may affect their suitability to work with children and vulnerable adults.
- Remember that abusers can be of any age, gender, ethnic background, or class, and avoid letting personal biases prevent appropriate action.

Bromley Conservatoire teachers, tutors and staff might have their suspicion or concern raised in several ways, including:

1. The conduct of another professional or adult.
2. A child disclosing abuse.
3. Evidence of physical harm, such as bruising.
4. Unusual behaviour by a child.

If a Bromley Conservatoire teacher, tutor or staff member has such concerns, they should report them immediately to the DSL (admin@bromley-conservatoire.co.uk). This applies whether the teacher or staff member is working in an employed or self-employed capacity. Bromley Conservatoire teachers, tutors and staff can always contact the DSL (admin@bromley-conservatoire.co.uk). to discuss any safeguarding concerns, regardless of how they arise.

Responding to a child making allegations of abuse

Take any disclosure of abuse from a child seriously. It is crucial not to discourage children from disclosing abuse due to fear of not being believed and to listen

attentively to what they have to say. Follow Bromley Conservatoire's procedure for reporting concerns and do not attempt to investigate the matter yourself.

1. Stay calm.
2. Listen carefully and show that you are taking the disclosure seriously.
3. Explain early on that the information will likely need to be shared with others and that you cannot promise confidentiality.
4. Assure the child that the information will only be shared with those who need to know.
5. Let the child speak at their own pace.
6. Ask questions only for clarification, avoiding any that suggest a particular answer.
7. Reassure the child that telling you was the right thing to do.
8. Inform them of the next steps and with whom the information will be shared.
9. Do not make any judgments about what you have heard.
10. Record what was said in writing as soon as possible, using the child's own words. Include the date, time, names mentioned, and to whom the information was given, and ensure the record is signed and dated.
11. Remember that while you may be the first to hear the allegation, it is not your responsibility to determine if abuse has occurred. That decision is for professional child protection agencies, following a referral from the Designated Safeguarding Lead.
12. Consider the child's wishes, age, development and communication needs.

Additional safeguarding indicators may include domestic abuse (including the impact on children as victims), exploitation, trafficking, coercive control, harmful sexual behaviour, online abuse, discriminatory abuse, radicalisation, and abuse outside the family.

Children with SEND and communication differences may face additional barriers to disclosure; adults must not assume that concerning behaviour is simply part of a disability.

Allegations or concerns about a teacher, staff member, or volunteer

Concerns about a teacher, tutor, staff member, or any adult engaged by Bromley Conservatoire must be reported immediately to the DSL (admin@bromley-conservatoire.co.uk) or an unimplicated director. The DSL must promptly inform the Local Authority Designated Officer (LADO) of any allegations that a staff member, teacher, tutor, or volunteer has:

- Behaved in a way that has harmed, or may have harmed, a child.
- Possibly committed a criminal offense against, or related to, a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm.

- Behaved in a way that indicates they may not be suitable to work with children.

For all other concerns, the DSL will consider the raised issues and seek appropriate advice, which may include confidential discussions with professional advisers. They will then decide whether to report the matter to the LADO, handle it internally, or take no further action. If new information arises later that warrants a referral to the LADO, the DSL will make the referral.
Bromley LADO contact details:

- LADO@bromley.gov.uk
- 020 8461 7775

If a teacher, tutor or staff member feels unable to report a concern within Bromley Conservatoire, they should:

1. Contact the LADO directly.
2. Contact the NSPCC whistleblowing advice line: 0800 028 0285 or help@nspcc.org.uk.
3. Report the incident directly to the police.

More information about the Bromley LADO referral process:
https://media.inzu.net/f0e9b37b8c44e338f64ae38c6d41e267/mysite/articles/604/A5_LADO_Procedure_Brochure_8pp.pdf

Bromley Conservatoire will assess and comply with its DBS referral duties where the statutory referral conditions are met, including relevant removal from regulated activity or where removal would have occurred had the individual not left. The allegation and decision-making must be documented, with relevant LADO advice.

Allegations Against a Child

There are various ways a child or young person may be abusive towards others, even without realising it:

- Bullying or cyberbullying
- Emotional abuse
- Online abuse (including online image abuse)
- Physical abuse
- Sexting
- Sexual abuse
- Sexual violence
- Harrassment
- Coercion
- Unwanted touching
- Discriminatory conduct

When a child abuses another child, it is sometimes referred to as 'peer-on-peer abuse' or ‘child-on-child abuse’. Children might also exhibit abusive behaviour towards adults. Concerns about a child's potentially abusive behaviour should be reported to the DSL (admin@bromley-conservatoire.co.uk) immediately, including relevant details (see "Keeping Records" below).

All child-on-child abuse concerns must be taken seriously. You must avoid dismissing incidents as banter or normal development.You might become aware of such concerns in several ways:

- A child or adult might directly allege abuse by a child or young person.
- A child or adult might express discomfort with a child or young person's behaviour. They may not realise that the behaviour is abusive.
- You, another teacher, staff member, or volunteer might observe behaviour that raises concern.
- A child or young person might confess to harming someone else or express the risk of doing so.

Keeping Records

It's important to keep accurate and detailed notes on any concerns you have about a child’s behaviour. Include:

- The child's details (name, age).
- The date and time of the incident.
- What was happening before the incident took place.
- What the child said or did that gave you cause for concern (write down their exact words if possible).
- Whether the behaviour appeared spontaneous or premeditated.

They must be separate from ordinary lesson reports and general administrative correspondence.

Talking to a child who tells you they have behaved abusively

If a child informs you directly that they have behaved abusively towards someone else:

- Talk to them calmly and remember that they need support.
- Reassure the child that they've done the right thing by telling you about it.
- Listen carefully to the child and let them tell their whole story. Don't try to investigate or quiz the child, but make sure you understand what they're saying.
- Use non-judgmental language.
- Tell them that you now must do what you can to keep them, and the other children involved safe.
- Never promise to keep what a child tells you a secret. Explain that you will need to speak to other people who can help.
- Reassure the child that they can get help to change their behaviour and move forward with their life.
- You may want to suggest the child contacts Childline for support: 0800 1111.

Responding to Incidents

Sometimes you might see a child behaving inappropriately and decide to talk to them about this immediately, to manage the behaviour.

- Remember that they may not realise their behaviour is unacceptable.
- Talk to them calmly and explain why their behaviour is unsuitable and what they can do to improve it.
- Refer to the Bromley Conservatoire Code of Behaviour for guidance.

Whistleblowing

Whistleblowing involves reporting wrongdoing because it is in the public interest to reveal it. This typically concerns something observed at work but can also occur in other contexts. The wrongdoing might have occurred in the past, be ongoing, or be something the whistleblower fears may happen soon.
The NSPCC whistleblowing helpline should be contacted if a teacher, tutor, staff member, or volunteer is concerned that:

- Bromley Conservatoire or another organisation lacks clear safeguarding procedures.
- Concerns are not being addressed properly or are being covered up.
- A previously raised concern has not been acted upon.
- There is a fear of repercussions for raising a concern.

NSPCC whistleblowing helpline:

- 0800 028 0285
- help@nspcc.org.uk

Safeguarding Vulnerable Adults

Adult abuse can happen to anyone who is over 18.
Safeguarding applies to an adult who:

- Has care and support needs (regardless of whether the local authority is meeting these needs)
- Is experiencing or at risk of abuse or neglect AND
- Is unable to protect themselves from the risk or experience of abuse or neglect due to their care and support needs

Such adults might:

- Be frail due to age, ill health, physical disability, cognitive impairment, or a combination of these
- Have a learning disability
- Have a physical disability and/or a sensory impairment
- Have mental health needs, including dementia or a personality disorder

- Have a long-term illness or condition
- Be users of substances or alcohol
- Lack the capacity to make decisions and require care and support

Abuse can be a one-time incident or happen repeatedly, affecting one or more individuals. Repeated poor care might indicate more serious issues, such as organizational abuse. Abuse can occur in any relationship and may cause significant harm or exploitation. It is often perpetrated by someone known to the victim and can result from intentional harm, neglect, failure to take appropriate action, or ignorance. Abuse can involve one or multiple individuals.
Adult abuse occurs when something is said or done to an at-risk adult that causes them to feel upset, hurt, or frightened. Abuse is not always intentional but causes harm, and action should be taken to prevent it from recurring.
If a teacher, tutor or staff member has concerns about an adult student or other adult at Bromley Conservatoire, they should report a concern in line with the Bromley Conservatoire procedures set out in this policy.

Safer Recruitment Policy

Bromley Conservatoire is committed to safeguarding and protecting all children and young people through robust safer recruitment practices:

1. Identifying and rejecting applicants who are unsuitable to work with children and young people
2. Responding to concerns about the suitability of applicants during the recruitment process
3. Responding to concerns about the suitability of employees and volunteers once they have begun their role
4. Ensuring all new staff and volunteers participate in an induction which includes child protection

Advertising, Interview and Selection

All tutors, teachers, staff and proposed deputy teachers must be vetted and formally approved by Bromley Conservatoire before undertaking duties. A contractor's right to propose a substitute does not give an unapproved person permission to work with children. Deputies must meet the checks, suitability, induction, supervision and role-eligibility requirements that apply to their actual duties.

1. Bromley Conservatoire's commitment to safeguarding must be clearly stated in any adverts for teacher, tutor or staff positions.
2. Interviews must be carried out by at least one person who has complete safer recruitment training.
3. Set safeguarding questions are asked during interview with answers reviewed by directors to establish whether additional training would be required.
4. Two references must be followed up for each candidate with questions related to safeguarding included.

5. Teachers and tutors will be asked to provide their most recent relevant qualifications. These will be cross-checked with their CV.
6. All teachers, tutors and staff members are required to complete a self-disclosure form to disclose previous convictions.

No person may begin unsupervised regulated activity with children before applicable barred-list status, identity and other essential safer-recruitment checks have been completed and approved.

Induction

Induction must include an explanation of reporting routes, DSL absence arrangements, child disclosures, low-level concerns, allegations, online safety, appropriate physical contact, supervision/collection and the secure concern-record system.

All tutors, teachers, staff and deputy teachers are required to:

1. Sign to confirm that they have read, understood and agree to this document: Safeguarding Policy, Code of Practice, Procedures and Safer Recruitment.
2. Provide an **enhanced DBS with barred list** check, not more than **3 years old**. If the above check cannot be provided, Bromley Conservatoire will initiate this check on their behalf. If they are part of the DBS update scheme, the initial certificate and update details must be provided.
3. Complete the appropriate DBS identity-verification route, right-to-work checks where applicable and references. Bromley Conservatoire must record evidence and completion before authorising unsupervised work. Role-specific qualifications should be checked when required or claimed.
4. All documents including identification and DBS certificates must be physically examined by a member of staff with safer recruitment training before unsupervised work commences.

A safeguarding induction email is sent to all teachers, with the document "**What to do if you are worried a child is being abused; advice for practitioners"**.

Annual Review

To ensure ongoing safeguarding compliance, teachers, tutors, volunteers and staff members will be required to complete or provide the following annually:

1. Sign to confirm that they have read, understood and agree to this document: Safeguarding Policy, Code of Practice, Procedures and Safer Recruitment.
2. A new DBS check if their current DBS check is over 3 years old. If they are on the DBS update scheme, the update service will be queried to check if anything has changed.

It is important to note that a DBS certificate does not itself cease to be valid automatically after three years.

Policy Review

We are committed to reviewing our policy annually.

Next scheduled review: no later than **19th September 2027**, and sooner following relevant legal/guidance changes, incidents or material changes to BC operations.