

# SAFEGUARDING POLICY

VERSION: 9.1



Version	By	Reason	Reviewed/Modified	Date Ratified
8	HB/CC/TS	<ul style="list-style-type: none"><li>Amendment to break in service process</li><li>Addition of Section 6: Online Learning Policy</li></ul>	April 2021	20/05/2021
8.1	HB/CC/TS	<ul style="list-style-type: none"><li>Updated Section 6: Online Learning Policy</li></ul>	November 2021	22/11/2021
9	HB/CC/TS	<ul style="list-style-type: none"><li>Change to Level 1 repeat timescales</li><li>Addition of Section 7: The Recruitment of Ex-Offenders Procedure</li></ul>	January 2023	27/02/2023
9.1	HB/TS	<ul style="list-style-type: none"><li>Updated recruitment process to meet Insurer requirements</li><li>Clarity about Trustee recruitment</li><li>Safeguarding training update</li></ul>	March 2023	28/03/2023

**This policy applies to all members of the Make Some Noise team including Trustees, members of staff and volunteers of Make Some Noise.**

### Policy Aim

This policy recognises that safeguarding covers a range of issues that require careful consideration, especially when working in partnership with multiple organisations, including:

- Staff recruitment and training
- Project planning, risk assessment and health and safety
- Disclosure of abuse and reporting procedure
- Data protection and use of images.

### Monitoring, reporting and review

The Chief Executive Officer will ensure that Make Some Noise monitors the effectiveness of this policy (and appendices). Make Some Noise will present Safeguarding reports covering number of cases, outcomes of decisions made, and changes made to processes/activities as a consequence of a case to the Board of Trustees quarterly and any subsequent reviews of this policy.

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### **Introduction**

Make Some Noise recognises its legal duty under the Children Act 1989 and Vulnerable Groups Act 2006 and subsequent legislation to work with other agencies under the relevant local authority safeguarding procedures in order to protect children and other vulnerable people accessing our services from “significant harm” to their health and development.

It sets out in clear terms how the procedures of Make Some Noise are designed to ensure the safety and protection of children, young people and vulnerable adults; and clarifies the role of the Make Some Noise and Partner Safeguarding Policies.

Sections 1, 3 and 4 of this policy are applicable only to MSN staff, Trustees, volunteers and contracted music leaders, trainees, consultants and freelance co-ordinators.

These sections do not apply to partner organisations or their staff whose procedures are dictated by their own safeguarding policies – as detailed in section 2.

### **Safeguarding officer**

The Chief Executive Officer of Make Some Noise is the primary designated Safeguarding Officer supported/deputised by the Head Operation and Programmes. The Chief Executive Officer will act as a contact between any team member or partner organisation of Make Some Noise who has a concern and the appropriate service/agency who will deal with the problem.

The Safeguarding Officer will not be expected to be a child or vulnerable adult protection expert but will be expected to have undertaken Level 2 Safeguarding training (and update/repeat every 2 years in line with the Department for Education – Keeping children safe in education: Statutory guidance for schools and colleges) as well as be a channel for information. They will not be expected to deal with any child/vulnerable adult protection issues on their own and will seek advice from appropriate external professionals such as NACRO, Local and Central Government. Where appropriate, the Safeguarding Officer will ensure that all team members and partner organisations of Make Some Noise receive copies of policies and procedures in relation to the safety and protection of children, young people and vulnerable adults.

The Safeguarding Officer will establish an incident log where they will record any reported incidents or breach of Safeguarding policies and procedures. This will be kept in a secure place and its contents will be confidential.

### **Dissemination of information to team**

The Safeguarding Officer will ensure that anyone employed or contracted by Make Some Noise (including trustees/music leader/trainees/consultants/freelance coordinators/volunteers etc) will be informed of the Safeguarding Policy adopted by Make Some Noise and agree to undertake procedures within it. The team will initially be made aware at interview and consequently be informed of any changes or additions to said policy

## **SAFEGUARDING POLICY**

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and will be expected to fulfil any requirements made of them to ensure full compliance with the policy and related legislation.

Section 1: Safer Recruitment Policy

Section 2: Project Planning and Delivery Policy

Section 3: Disclosure of Abuse and Reporting Procedure Policy

Section 4: Good Practice and Personal Conduct Policy

Section 5: Social Media Policy

Section 6: Online Learning and Delivery Policy

Section 7: The Recruitment of Ex-Offenders Procedure

### **RELEVANT LEGISLATION**

- Children's Act 1989
- Children's Act 2004
- Vulnerable Groups Act 2006
- Rehabilitation of Offenders Act 1974
- Data Protection Act 1988
- General Data Protection Regulations

### **FORMS REFERRED TO IN THIS POLICY**

- Make Some Noise Application Form
- Reference Template
- Break in Service Checks: Interim Review Checklist
- General Risk Assessment Form and guidance notes
- Authorisation for DBS Update Service online check
- Recording of Disclosures Form

### **LINKED POLICIES**

- Mobile Phone Policy
- Equal Opportunities Policy

### **FURTHER INFORMATION**

- Working together to Safeguard Children guidance  
(<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>)
- Keeping children safe in education: Statutory guidance for schools and colleges  
(<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>)
- [www.gov.uk](http://www.gov.uk)
- [www.nspcc.org.uk](http://www.nspcc.org.uk)
- [Make Some Noise Data Protection Policy and Privacy Statement](#)

**SECTION 1: SAFER RECRUITMENT POLICY**

The Safeguarding Officer will ensure that anyone employed or contracted by Make Some Noise (including trustees/music leader/trainees/consultants/freelance coordinator/volunteers etc) who maintains frequent, unsupervised and intensive contact with children, young people or vulnerable adults as part of their work for Make Some Noise will be expected to undergo a thorough safeguarding process to include:

- Completion and submission of Make Some Noise Application Form for freelance music leaders, co-ordinators and staff
- Submission of CV for trustees and volunteers and a Make Some Noise Application Form where necessary Minimum of two relevant and satisfactory References (Make Some Noise Reference template)
- Where qualifications/professional memberships are a requirement of a role with a Safeguarding risk these will be independently verified
- Online Staffordshire and Stoke on Trent Safeguarding Children Board (level 1) safeguarding training course. In some instances, a higher-level training and/or other training may be required. The Level 1 safeguarding training will need to be repeated annually. Other training will be repeated as required by Insurers or stakeholder requirement whichever is soonest
- Disclosure and Barring Service (DBS) check at the level relevant to the role, and including Enhanced and/or Barred List checks if necessary
- Members of the team to subscribe to and maintain a subscription with the DBS Update Service following DBS check funded by Make Some Noise
- Freelance musicians hold Public Liability Insurance
- Driving licence where required
- Car Insurance Business use.

Agreements and contracts between trustees, freelance music leaders, co-ordinators, staff, volunteers and Make Some Noise will include confirmation that the individual has read, understood and agreed with the Make Some Noise Safeguarding Policy and agrees to follow the guidelines and procedures within it. Where necessary any training and support will be available from Make Some Noise staff and partners, including approved online training.

**Disclosure and Barring Service (DBS) Disclosures**

New DBS disclosures (at the relevant level) will be required for trustees, staff, volunteers and freelance workers new to Make Some Noise where the position meets the prevailing eligibility criteria. DBS disclosure payments will be at the discretion of Make Some Noise.

In the period of time where DBS disclosures are pending trustees, staff, volunteers and freelance workers will be allowed to work/volunteer with children, young people and vulnerable adults if they are fully supervised by a colleague with an up to date DBS disclosure. The acceptability of this will be checked with the Partner Organisation/Venue where this is appropriate.

**Disclosing criminal convictions during employment**

Individuals in positions for which a criminal record check is required will be required to declare any cautions, convictions or reprimands that they receive during the course of their employment/contract. The relevance of any conviction, caution or reprimand will be considered by the CEO in line with 'Considering the relevance of convictions' (above).

**Recruitment of ex-offenders**

Where a role within Make Some Noise is considered exempt from the Rehabilitation of Offenders Act 1974; this does not mean that those with previous convictions cannot legally be offered roles working with vulnerable children and adults OR Make Some Noise, unless their names are listed on the relevant DBS Barred Lists.

When considering recruiting an individual with a criminal record or positive disclosure, a risk assessment will be carried out taking into account all the factors relating to the role, the criminal record and the level of risk associated with recruiting the individual concerned.

**Considering the relevance of convictions**

Make Some Noise is committed to ensuring that applicants with a criminal record are treated fairly.

Receipt of a certificate containing criminal record information will not automatically render an applicant or existing member of the team unsuitable for a position unless stipulated by statute/guidance. However, individuals commit a criminal offence if they seek to work with children/adults if they are listed on the Children's/Adults Barred List.

Make Some Noise will only consider convictions that are relevant to the position. The overriding consideration will be the duty to safeguard children and/or vulnerable adults. The suitability of the individual for the role will be reviewed considering all the information available and having regard to best practice.

**Dissemination of information to team**

The Safeguarding Officer will ensure that anyone employed or contracted by Make Some Noise (including trustees, music leader/trainees/consultants/freelance co-ordinators/volunteers etc) will be informed of the Safeguarding Policy adopted by Make Some Noise and agree to undertake procedures within it.

Team members will initially be made aware at interview and consequently be informed of any changes or additions to said policy and will be expected to fulfil any requirements made of them to ensure full compliance with the policy and related legislation.

**Break in service checks**

Those who have had a break of more than 9 months since last working/volunteering for the organisation will be subject to an interim interview (using the Break in Service Checks: Interim Review Checklist form) and a DBS Update Service check. Where there is no current

Update Service subscription in place a new DBS check at the expense of the freelancer will be required.

Those who have had a break of more than 12 months since last working/volunteering for the organisation will be subject to a new DBS check (or DBS Update Service check if this is available at the correct level and workforce), the provision of two acceptable references, and completion of a Level 1 Safeguarding Training course.

#### **DBS Update Service**

**Make Some Noise requires team members to subscribe to, and maintain a subscription, to the DBS Update Service following a first or repeat check.**

As from January 2015 it will be a requirement that any - trustees, music leader/trainees/consultants/freelance co-ordinators/volunteers etc undergoing a DBS check paid for by Make Some Noise (either first or a recheck) will agree to sign up to the DBS Update Service (Authorisation for DBS Update Service check form). **Failure to do so could result in no further contracts being offered and/or existing contracts being withdrawn. If you fail to subscribe/maintain a subscription and you wish to carry on working with us, you will be charged for a new DBS.**

The DBS Update Service is an online government service which, once subscribed to, allows an individual's DBS Certificate to be kept up to date for as long as they are subscribed or until new information is added to the Certificate; enabling it to be taken from role to role, within the same workforce, where the same level of check is required.

An annual subscription fee (currently £13 as at 18 October 2021) is required to join the DBS Update Service, unless you are joining with a DBS Certificate for a voluntary position in which case it is free.

An individual can join the DBS Update Service at point of application (MSN Operations and Finance Manager can provide the application number) or within 30days of issue of their DBS Certificate.

#### **Accepting existing certificates / portability**

Make Some Noise will only accept existing criminal record certificates, with an update Service subscription, in the following circumstances:

- Where the original certificate is provided
- Where the certificate is for the appropriate workforce and at the appropriate level for the position
- Where the Update Service determines the certificate "remains current". If new information is available, then Make Some Noise will request a new criminal record check.

**DBS Update Service checks**

Periodically (at least annually) we will carry out an online check using the Update Service – this will include, but not be limited to, annual checks and/or prior to issuing of any new contracts.

The freelance worker will grant Make Some Noise permission using the Authorisation for DBS Update Service online check form. For more detailed guidance visit [www.gov.uk/db-update-service](http://www.gov.uk/db-update-service)

Following completion of a DBS paid for by Make Some Noise, team members are required to complete an Authorisation for DBS Update Service online check form, this will be retained on file but can be withdrawn at any time – this could result in no further contracts being offered and/or existing contracts being withdrawn.

**Duty to Refer**

Make Some Noise has a legal duty to refer to the DBS anyone who:

- has harmed or poses a risk of harm to a child or vulnerable adult
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence; and
- the person they're referring is, has or might in future be working in regulated activity; and
- the DBS may consider it appropriate for the person to be added to a barred list.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

**SECTION 2: PROJECT PLANNING AND DELIVERY POLICY**

**Make Some Noise led projects**

Projects managed and delivered centrally by Make Some Noise may involve a 'host' partner organisation (such as a school, community centre, nursery etc) with responsibility for recruitment, supervision and safeguarding of the participants. Where this is not the case, Make Some Noise is responsible for recruitment, supervision and safeguarding of the participants.

The MSN staff managing the project will ensure that an MSN-led agreement specifies the requirement for the host partner to have in place a comprehensive Safeguarding Policy; agreeing that activity will be appropriately supervised by either Make Some Noise and/or 'host' partner staff and the proper risk assessment and health and safety measures will be undertaken (as detailed below).

At the start of each project it will be agreed that either Make Some Noise or the 'host' partner will be responsible for the gathering of documentation such as parent/carers permission, emergency contacts, medical details and photography permission.

Where the 'host partner' has this responsibility evidence of such will be provided to Make Some Noise to be filed.

**Partnership projects**

Where Make Some Noise is a management or strategic partner, but not lead delivery partner of a project, the project will be delivered in line with the lead partner's safeguarding policy; which will be agreed with Make Some Noise. An agreement will also confirm that the lead partner and/or delivery partner will be responsible for the DBS checking of all music leaders to enhanced level; properly supervising activity; ensuring the relevant health and safety, risk assessment and insurance measures are taken; and gathering documentation such as parent/carers permission, emergency contacts, medical details and photography/video/audio consent.

**Partner-delivered/In association projects (e.g. commissioned projects)**

Where projects are delivered by partner organisations on behalf of Make Some Noise, they will be delivered in line with the partner's safeguarding procedure; which will be agreed with Make Some Noise.

Agreements must be in place to confirm that each partner is responsible for the DBS checking of all music leaders to enhanced level; properly supervising activity; ensuring the relevant health and safety, risk assessment and insurance measures are taken; and gathering documentation such as parent/carers permission, emergency contacts, medical details and photography/video/audio consent.



#### **Health and safety**

Make Some Noise believes that all activities should take place in a safe environment and that it is their responsibility to ensure that the rooms and equipment being used are appropriate. This includes safety, health and hygiene issues, fire evacuation and transport.

Make Some Noise realises that music projects may be particularly at-risk regarding issues around excess noise and hearing damage; lifting of equipment and use of electrical equipment. All such issues will be covered in individual project risk assessments (see below) and relevant preventative measures taken such as hearing protection; appropriate noise levels maintained during activity; headphones provided; training provided in appropriate lifting techniques and safety when using electrical equipment adhered to.

Make Some Noise will ensure (where appropriate in negotiation with 'host partners') that a correctly stocked first aid box will be available at all times and team will be trained to use it. The name of the first aider will, where possible, be displayed prominently and all music leaders will be aware of who this is. An accident book will be kept by Make Some Noise or, where more appropriate, the 'host partner'. Where a venue is identified as having no first aid box the relevant Music Leader (or other support staff) will be responsible for providing a fully stocked first aid box (cost of purchasing and re-stocking to be met by Make Some Noise). Where appropriate and relevant Make Some Noise will also support team in gaining first aid qualifications.

#### **Risk assessment**

A full risk assessment will be carried out in collaboration with the 'host partner', and risk assessments will form part of the Partnership Agreement discussions. A copy of Make Some Noise risk assessment should be shared with the 'host partner' and a copy of the 'host partner' risk assessment for the type of activity in their venue should be requested. This will cover health and safety and safeguarding issues and clearly identify responsibility for all issues. All team members involved in the project will be given copies of the risk assessment and made aware of any issues and their own responsibility. The General Risk Assessment Form and Guidance Notes will be used.

#### **Data protection**

Where information of a personal nature from participants or team is required it will be treated confidentially and securely stored for only the duration necessary. Where such information is collected the need will be clearly communicated and only shared with partners as agreed by the parties involved.

#### **Use of photograph/video/audio recording**

Photograph/video/audio recording of participants in projects and performances may be used for documentation, celebration and publicity. While Make Some Noise is keen to maximise and enable children, young people and vulnerable adults the opportunity to have their achievements recorded, we also have a duty to ensure safety and that images are not misused.

This is a delicate balancing act over which we do not have total control, but all team should follow current advice:

Photographs, videos and audio recordings may only be taken of participants for whom Make Some Noise has written permission from a person with parental responsibility. Written permission must be obtained by an “opt-in” return slip in order to provide evidence that person with parental responsibility had sufficient opportunity to make an informed decision.

Permission should be broken down into the following categories, reflecting the different level of risk:

- Photographs, videos and audio recordings in internal evaluation and/or accreditation/training
- Photographs, videos and audio recordings in marketing, publicity and press
- Photographs, videos and audio recordings on the Make Some Noise website
- Photographs, videos and audio recordings on other public and social network websites
- Include full name, age and town of residence in press.

Different levels of protection should also be taken dependent on the risk of different situations:

- Photographs in Press, Print or on any website
  - The appropriate venue/parent/carer permission should be obtained
  - No name should accompany the photograph, unless consent is given by service user or parent/carer if under 16
- Photographs on the Make Some Noise Website
  - The appropriate parent/carer permission should be obtained
  - No name should accompany the image, unless consent is given by service user or parent/carer if under 16
  - No identifying details that allow a young person to be tracked down – i.e. regular venue either by caption or on the image itself
- Video Images on the Make Some Noise Website
  - The appropriate parent/carer permission should be obtained
  - No name should accompany the image, unless consent is given by service user or parent/carer if under 16
  - No identifying details that allow a young person to be tracked down – i.e. regular venue either by caption or on the image itself
- Video Images or Photographs on a Public Web Platform
  - The appropriate parent/carer permission should be obtained
  - No name should accompany the image, unless consent is given by service user or parent/carer if under 16
  - No identifying details that allow a young person to be tracked down – i.e. regular venue either by caption or on the image itself

**Section 2: Project Planning and Delivery Policy**

- If possible, a 'Private Profile' should be selected which means those wanting to access the site have to request permission to be 'friends' first.

**Storage of images**

Photographs taken centrally by Make Some Noise will be stored securely in both hard and electronic copy – only photos with full permission level are stored. Photographs will be retained in line with timescales set out in the Data Protection Policy.

#### SECTION 3: DISCLOSURE OF ABUSE AND REPORTING PROCEDURE POLICY

Ratification of this policy and its subsequent revisions shall be recorded as including this Section and any Appendices.

##### **Procedure**

Make Some Noise Partnership Agreements and Service Level Agreements specify the level of team support required from the venue staff at each session, there are three levels of support identified:

- 1 None
- 2 Staff on site and available
- 3 Present at all times at all sessions due to the nature of the setting.

This ensures that members of the Make Some Noise team do not take sole responsibility for well-being of participants. It is, however, recognised that this responsibility rests with all workers that are present.

If any member of Make Some Noise team is concerned that a child/vulnerable adult may be suffering or is at risk of significant harm they must report their concerns immediately to the 'host partner' and the designated Safeguarding Officer for Make Some Noise. Guidance on this process is available at Appendices 3a and 3b.

The designated Safeguarding Officer and 'host partner' will then decide whether or not to make a referral to the appropriate agencies. Make Some Noise team may be asked to provide a written account of any incident/disclosure to the designated officer within two days and any incident will always be documented and securely stored.

The Safeguarding Officer will ensure that members of team have access to the following guidance at all times.

If you are concerned about a child, young person or vulnerable adult, or if a child, young person or vulnerable adult expresses a wish to disclose their own concerns:

- Listen to anything they say
  - DO NOT question the young person beyond normal friendly enquiries. Do not use leading questions. The role of Make Some Noise team is to refer concerns, not to investigate them
  - DO NOT promise confidentiality
  - Make brief notes as soon as possible
- Report your concerns to the designated Safeguarding Officer at Make Some Noise and the 'host partner' **at your earliest opportunity.**

### **Section 3: Disclosure of Abuse and Reporting Procedure Policy**

#### **Allegations against Make Some Noise team**

In the event of any allegation of harm arising with respect to any member of team who is currently under contract to Make Some Noise, immediate consultation must take place with the Designated Safeguarding Officer. This should take place, if possible, before discussing the concerns with the team member involved.

This guidance should be used in respect of all cases in which it is alleged that a member of the team has:

- behaved in a way that has harmed a child and/or vulnerable adult, or may have harmed a child and/or vulnerable adult
- possibly committed a criminal offence against or related to a child and/or vulnerable adult; or
- behaved towards a child or children and/or vulnerable adult(s) in a way that indicates he or she would pose a risk of harm.

Employers have a duty of care to their team. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. It is essential that any allegation of abuse made against a member of the Some Noise team is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and/or vulnerable adult and at the same time supports the person who is the subject of the allegation.

The Safeguarding Officer will decide whether to initiate a strategy meeting with the relevant Safeguarding authorities complex abuse procedures, to which the appropriate line manager will be invited and at which decisions will be made on an inter-agency basis regarding the conduct of any further investigation.

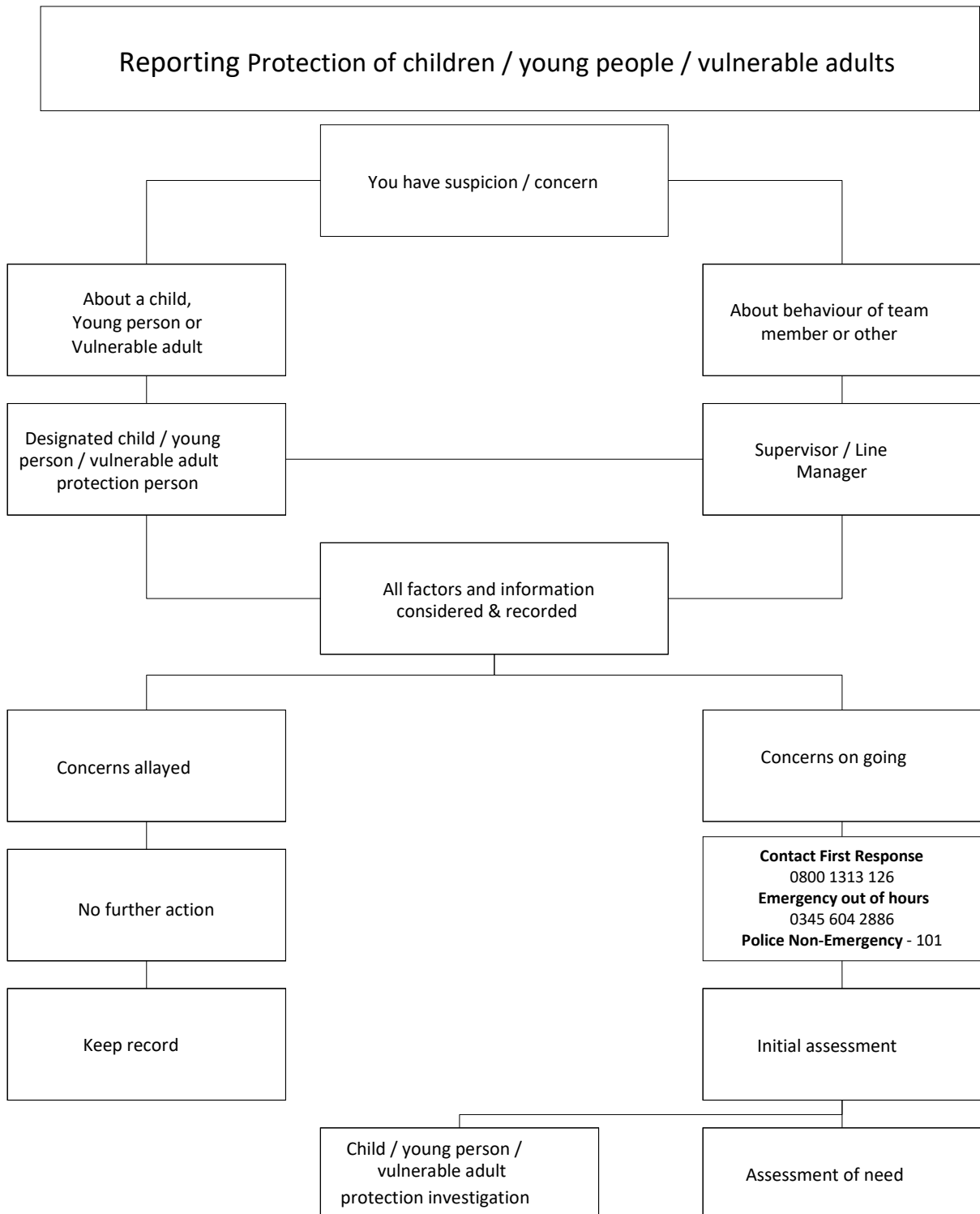
Any complaints made to the police or social services which are made about any member of Make Some Noise team and that raise child protection or vulnerable adult concerns, will be dealt with under these same procedures.

All complaints, allegations and the subsequent decisions and actions taken by the Safeguarding Office shall be recorded and kept on file using the current Recording of Disclosures Form. Irrespective of any investigation by social workers or the Police, Make Some Noise disciplinary procedures will be followed. This means in each individual case a decision will be made on the extent to which each individual can continue their current role.

#### **Ex-team members and historical allegations**

Allegations against a member of the team who is no longer under contract to Make Some Noise should be referred to the police. Historical allegations of abuse should also be referred to the police.

**APPENDIX 3a: REPORTING PROCEDURE**



**APPENDIX 3b: DEFINITIONS OF ABUSE AND NEGLECT**

**What is abuse?**

**Abuse:** a form of maltreatment of a person. Somebody may cause abuse or neglect by inflicting harm or by failing to act to prevent harm. Abuse may occur in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by another adult or adults or another child or children.

The government guidance, *Working Together to Safeguard Children*, categorises abuse as:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect.

These categories are expanded upon in the definitions below, which are largely taken from the NSPCC document, *Firstcheck*. Remember that in all forms of abuse there are elements of emotional abuse and that it is possible to be subjected to abuse in more than one way at a time. These four categorisations and the definitions below do not minimise other forms of maltreatment.

The NSPCC notes that there are other sources of stress for children and families such as, domestic violence, the mental illness of a parent or carer, or drug or alcohol misuse. All these may have a negative impact on a child's health and development and may be noticed by an organisation caring for a child. If it is felt that a child's well-being is being damaged by any of these areas, the same procedures as for abuse should be followed.

Vulnerable adults may also be subject to other types of abuse as well as to the four types of abuse listed above. They may be manipulated financially or discriminated against because of a disability or other factor that makes them vulnerable. Further information is in the Department of Health and Home Office guidance on protecting vulnerable adults *No Secrets*.

**What is physical abuse?**

Physical abuse includes hitting, shaking, throwing, poisoning or misuse of medications, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after.

**What is emotional abuse?**

Emotional abuse is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on that person's emotional development. It may involve making the individual feel or believe that they are worthless or unloved, inadequate. It may

**Section 3: Disclosure of Abuse and Reporting Procedure Policy**

also involve causing the person to feel often frightened or in danger. It may involve exploitation or corruption.

**What is sexual abuse?**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child or young person is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts or non-penetrative acts. Sexual abuse also includes non-contact activities, such as involving children or young people in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

Sexual abuse of vulnerable adults can be rape and sexual assault or sexual acts to which the person does not consent or cannot consent or is pressured into consenting.

Sexual abuse may be same-sex or opposite sex, may be by other children, young people or adults. People from all walks of life may be sexual abusers.

**What is neglect?**

Neglect is the persistent failure to meet a child's, young person's or vulnerable adult's basic physical and/or psychological needs, likely to result in the severe impairment of the person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failure to protect a child, young person or vulnerable adult from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment.

It may also include neglect of a child's, young person's or vulnerable adult's basic emotional needs.



#### **SECTION 4: GOOD PRACTICE AND PERSONAL CONDUCT POLICY**

Ratification of this policy and its subsequent revisions shall be recorded as including this Section and appendices.

Employees, Freelance Music leaders should read this policy in conjunction with guidance to be found in the Freelance Handbook.

All projects co-ordinated by Make Some Noise will involve a partner organisation with responsibility for recruitment and supervision of the participants (host partner). In the interest of good practice and proper supervision at least one member of staff from the 'host partner' should always be present during activity. Partnership Agreements state whether a member of staff is required to be available or in the room at all times, depending on level of risk.

All children, young people and vulnerable adults involved in Make Some Noise projects will be treated equally and with respect and dignity. Where unacceptable behaviour is present adults will not shout or use physical punishment or threatening behaviour.

Any behaviour problems will be handled in a developmentally appropriate manner by the 'host partner'. The welfare of all participants will be put first allowing the development of mutual trust and respect and enabling a genuinely enjoyable and creative atmosphere.

All Make Some Noise team members recognise that they are prohibited by law from administering any form of corporal punishment to a child or young person. This includes any form of hitting, slapping, shaking or other degrading treatment. If it is necessary to use physical restraint to protect a child from harming themselves or others, this must be the minimum necessary in the situation. All such incidents must be reported immediately to the relevant line manager and a written record kept. Parents/carers must be immediately informed of any incident by the line manager, in writing.

Team members should rarely be in a one-to-one situation with children or young people as 'host partner' staff should always be present. However, team must keep their personal contact with children under constant review and seek to minimise any situation arising that may lead to misunderstanding. Where at times team members need to physically touch a pupil in order to demonstrate (drum technique for example) pupils should be asked: "Is it alright if I move your hand into the correct position on the drum?" etc – before any physical contact takes place. Where possible – demonstrate by using your own instrument.

Where team are working with children or young people known to have a history of disruption, challenging behaviour or violence, they should discuss the matter with the 'host partner' and/or their line manager if they have any concerns.

### **Section 4: Good Practice and Personal Conduct Policy**

Team members should avoid situations where they are alone and unobserved with individual children and all activity, as far as possible, should be publicly observed. Where possible a male and female worker should supervise mixed activities and team ratios should be appropriate to the age and specific needs of the children or young people involved.

#### **Mobile Phones, email and social networking**

Please see Mobile Phone Policy

#### **Giving children and young people a lift by car**

Team members should recognise that this is a sensitive area and that in normal circumstances they should not offer a lift in their car to participants.

There are occasions, however, when a responsible team member may feel it to be in the interest of the safety of the participant to give them a lift rather than to leave them alone in a vulnerable situation. In this circumstance, every effort must be made to contact the person with parental responsibility and the Chief Executive Officer or Head of Operations & Programmes to seek their approval. If this is not possible, then the participant should be taken directly to their destination and the parent/carers contacted as soon as reasonably possible to report the situation. In a situation where this opportunity is not appropriate, then the Police must be contacted via the non-emergency number.

#### **Transporting a number of children or young people by car**

On occasion, it may be necessary for a member of the team to transport a number of participants by car – for example, from a school to a performance/rehearsal. In these circumstances, written permission must be sought from the parent/carers beforehand and the journey should be made with the full knowledge of the ‘host partner’. Team members are reminded that they must have business use and comprehensive car insurance and ensure that the children/young people are wearing seat belts or are restrained in a car seat appropriate to their age.

#### **Conduct with participants**

Remember that all team members are professional ambassadors for Make Some Noise and a positive role model for the participants – everything you do should reflect this. All team members must adhere to this conduct guide:

- Avoid being left alone in a setting with a single participant except in one to one mentoring situation. If a setting/school worker needs to leave for a long period of time make it clear that is stated in the Make Some Noise’s Safeguarding Policy that for safeguarding purposes workers should not do lone working. Explain that this is also stated in the Partnership Agreement that the setting/school will have signed
- Do not initiate any physical contact with participant. It should not be necessary. If the nature of the workshop requires any physical contact this should be discussed with the support workers/teachers in advance

### **Section 4: Good Practice and Personal Conduct Policy**

- If a participant initiates physical contact such as approaching you for a hug, deflect them if possible and stay side on to the child
- Do not encourage participants to sit on your knee. Sit beside them
- You are not in the school/setting in a disciplinary capacity. Leave that to the support workers/teachers
- Avoid getting involved in issues that arise amongst the participants. For instance, don't try to break up a fight
- If a participant informs you of a problem, tell a teacher. Don't hang around/listen in while the teacher deals with the situation
- If a participant has an accident first aid trained venue staff on site are responsible for administering first aid (find out who the designated first aider is and where the first aid box and book are kept)
- If you are exploring sensitive issues, such as bullying or drugs, participants could approach you with their problems. Without being dismissive, try to avoid becoming involved. Do not agree to keep the issue secret and encourage them to tell a support workers/teacher or parent.
- If a participant tells you something that leads you to suspect that they are being abused or may cause harm to another person. Let the participant know clearly and as gently and as soon as possible that an important part of your job is to ensure the safety of any participant and that you have a legal duty to inform the school/setting and to report it to Make Some Noise
- Maintain professional behaviour at all times

#### **Practices never to be allowed**

- Engaging in rough, physical or sexually provocative activities, including horseplay
- Allow or engage in any form of inappropriate touching
- Allow children to use inappropriate discriminatory language unchallenged.
- Make sexually suggestive comments to a participant, even in fun
- Reduce a participant to tears as a form of control
- Allow allegations made by a participant to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature for participants that they can do for themselves
- Never take responsibility for a participant under any circumstances
- Never give a participants your personal contact details (in the rare occasion you need to because of contact for projects, inform a member of the Make Some Noise office team)
- Do not accept requests from participant or invite participants to be your friends on your personal social networking sites.

#### **Good practice guidelines for school/setting premises**

##### **Vehicle**

- Drive slowly, taking particular care when reversing

### **Section 4: Good Practice and Personal Conduct Policy**

- If you do not know where the entrance is, it is better to stop and go in on foot rather than drive around the grounds
- Switch off any music when arriving on school/setting premises
- Never obstruct fire exits when parking – even temporarily
- Check with Reception where you can park – you may be allowed nearer to unload
- Lock the vehicle at all times.

#### **Reception**

- Always sign in at reception
- Wear Make Some Noise T-Shirt – where issued and appropriate
- Make sure you know and follow school/setting procedures and times
- Ask where the staff toilets are – never use the service users' toilets
- Avoid wandering around the school/setting alone.

#### **Conduct around a setting**

- Never smoke anywhere on the school/setting premises – including your vehicle
- Alcohol and recreational drugs should never be taken onto school/setting premises under any circumstances
- Alcohol should not be consumed before arriving at a school/setting
- Prescribed drugs should be kept hidden and out of reach – eg in a locked vehicle
- Move around quietly – avoid shouting, loud laughter, slamming doors or any unnecessary noise
- Make sure language and conversation is appropriate
- Be aware of school/setting rules – some do not allow sweets or chewing gum
- Report any accidents or breakages immediately
- Wear your named visitor badge
- Ensure your room setting is suitable for purpose with windows in the doors so you and the people you are working with can be seen
- Our Agreements with Partners specify which levels of support is required from the venue at each session. Inform Make Some Noise office team asap if the correct level of support is not provided. These are:
  - \* None
  - \* Staff on site and available
  - \* Present at all times due to nature of session

#### **Data protection**

There are a number of simple and sensible precautions that can be taken to ensure that any data obtained during workshops is protected.

- Always log out of any online software/programmes – never just close down
- Never leave mobile phones/computers unlocked and available to participants where they contain participant data

**Section 4: Good Practice and Personal Conduct Policy**

- Where you have paper documentation ensure this is passed to Make Some Noise as soon as possible and is always securely stored
- Where there is a need to take photographs/video/audio recordings for a programme ensure that Consent has been obtained
- Photographs/video/audio recordings should be deleted from a phone, camera or computer immediately after it is no longer needed.

**SECTION 5: SOCIAL MEDIA PROCEDURE****What is social media?**

Social media is the term given to web-based tools and applications which enable users to create and share content (words, images and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media that Make Some Noise use are include Facebook, Twitter, YouTube, LinkedIn and Instagram.

**Why do we use social media?**

Social media is essential to the success of communicating Make Some Noise's work. It is important for some team members to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of Make Some Noise's work.

**Why do we need a social media policy?**

The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to Make Some Noise's work. While we encourage the use of social media, we have certain standards, outlined in this policy, which we require everyone to observe. Publication and commentary on social media carry similar obligations to any other kind of publication or commentary in the public domain.

This policy is intended for all team members of all levels, office team, freelancers, volunteers and trustees and applies to content posted on both a Make Some Noise device and a personal device. Before engaging in work-related social media activity, team members must read this policy.

**Setting out the social media policy**

This policy sets out guidelines on how social media should be used to support the delivery and promotion of Make Some Noise, and the use of social media by team members in both a professional and personal capacity. It sets out what you need to be aware of when interacting in these spaces and is designed to help team members support and expand our official social media channels, while protecting the charity and its reputation and preventing any legal and safeguarding issues.

**Internet access and monitoring usage**

There are currently no access restrictions to any of our social media sites in the Make Some Noise office. However, when using the internet at work, it is important that team members refer to the IT & Internet Policy. You are permitted to make reasonable and appropriate use of personal social media activity during your lunch breaks. But usage should not be excessive and interfere with your duties.

**Point of contact for social media**

Our office staff and occasionally our freelancers, are responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have specific questions about any aspect of these channels, speak to the Chief Executive Officer or Head of Operations & Programmes. Some of our freelance team members have been contracted with the responsibility for the day-to-day publishing and monitoring of our social media channels to specific project-related communication. No other team member can post content on Make Some Noise's official channels without the permission of the Chief Executive Officer or Head of Operations & Programmes.

**Which social media channels do we use?**

Make Some Noise uses social media channels to share news with supporters to encourage people to become involved in our work by participating, spreading news or donating, promote current campaigns, showcase the positive work of the organisation with the aim of being open and transparent and reassuring the public, screen press conferences and appeals for involvement, deliver video messages during large-scale public emergencies or events, demonstrate MSN careers for the purposes of recruitment, give an insight into what county councillors can do for the public, help to promote local services, help people to contact MSN and build the brand, stir up interest in a service, event or initiative and gain vital feedback and comments from the public.

**GUIDELINES****Using Make Some Noise's social media channels – appropriate conduct**

- The Chief Executive Officer or Head of Operations & Programmes is responsible for setting up and managing Make Some Noise's social media channels. Only those authorised to do so by the CEO will have access to these accounts
- Be an ambassador for our brand. Team members should ensure they reflect Make Some Noise's values in what they post and use our tone of voice. Our brand guidelines set out our tone of voice that all team members should refer to when posting content on Make Some Noise's social media channels
- Make sure that all social media content has a purpose and a benefit for Make Some Noise and accurately reflects Make Some Noise's agreed position
- Bring value to our audience(s). Answer their questions, help and engage with them
- Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors. Also check the quality of images
- Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate
- Team members shouldn't post content about supporters or participants without their express permission. If team members are sharing information about supporters, participants or third-party organisations, this content should be clearly labelled so our audiences know it has not come directly from Make Some Noise. If using audio recordings, videos or photos that clearly identify participants, team members must

ensure they have the consent of a parent or guardian before using them on social media. See Safeguarding Policy Section 2: Use of participant images for further information

- Always check facts. Team members should not automatically assume that material is accurate and should take reasonable steps where necessary to seek verification, for example, by checking data/statistics and being wary of photo manipulation
- Be honest. Say what you know to be true or have a good source for. If you've made a mistake, don't be afraid to admit it
- Team members should refrain from offering personal opinions via Make Some Noise's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about Make Some Noise's position on a particular issue, please speak to the Chief Executive Officer or Head of Operations & Programmes
- It is vital that Make Some Noise does not encourage others to risk their personal safety or that of others, to gather materials. For example, a video of a stunt
- Team members should not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material
- Team members should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of Make Some Noise. This could confuse messaging and brand awareness. By having official social media accounts in place, the Chief Executive Officer or Head of Operations & Programmes can ensure consistency of the brand and focus on building a strong following
- Make Some Noise is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. We have every right to express views on policy, including the policies of parties, but we can't tell people how to vote
- If a complaint is made on Make Some Noise's social media channels, team members should seek advice from the Chief Executive Officer or Head of Operations & Programmes before responding. If they are not available, then team members should speak to the Chief Executive Officer.

Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the charity's reputation. Examples might include: involvement in a failed safeguarding issue, malicious claims by unhappy participants. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

The Chief Executive Officer and Head of Operations & Programmes regularly monitors our social media spaces for mentions of Make Some Noise so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, the Chief Executive Officer or Head of Operations & Programmes will do the following:

- Pause scheduled social media posts
- Pause paid ads on social media channels



- Pause marketing emails
- Assess planned news scheduled for appropriateness
- Create news addressing situation as needed
- Check all content for relevant references that could be perceived as offensive or rude in light of the event
- Create plan for internal communications as needed
- Communicate office impact / updates via social media
- Notify colleagues speaking that day on need to address (or not) any relevant talking points.

If any of the team outside of the Make Some Noise become aware of any comments online that they think have the potential to escalate into a crisis, whether on Make Some Noise's social media channels or elsewhere, they should speak to the Chief Executive Officer or Head of Operations & Programmes immediately.

**Use of personal social media accounts – appropriate conduct**

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. Make Some Noise team are expected to behave appropriately, and in ways that are consistent with Make Some Noise's values and policies, both online and in real life.

- Be aware that any information you make public could affect how people perceive Make Some Noise. You must make it clear when you are speaking for yourself and not on behalf of Make Some Noise. If you are using your personal social media accounts to promote and talk about Make Some Noise's work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent Make Some Noise's positions, policies or opinions"
- Team members who have a personal blog or website which indicates in any way that they work Make Some Noise should discuss any potential conflicts of interest with their line manager. Similarly, team members who want to start blogging and wish to say that they work for Make Some Noise should discuss any potential conflicts of interest with their line manager
- Those in senior roles, and specialist roles where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing Make Some Noise's view
- Use common sense and good judgement. Be aware of your association with Make Some Noise and ensure your profile and related content is consistent with how you wish to present yourself to the general public, colleagues, partners and funders
- As and when Make Some Noise works with several high-profile people, including celebrities, journalists, politicians and major donors. Please don't approach high profile people from your personal social media accounts to ask them to support the charity, as this could hinder any potential relationships that are being managed by the Chief Executive Officer. This includes asking for retweets about the charity

- If you have any information about high profile people that have a connection to our cause, or if there is someone who you would like to support the charity, please speak to the Chief Executive Officer and Head of Operations & Programmes to share the details
- If a team member is contacted by the press about their social media posts that relate to Make Some Noise, they should talk to the Chief Executive Officer or Head of Operations & Programmes immediately and under no circumstances respond directly
- Make Some Noise is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. When representing Make Some Noise team members are expected to hold Make Some Noise's position of neutrality. Team members who are politically active in their spare time need to be clear in separating their personal political identity from Make Some Noise and understand and avoid potential conflicts of interest.
- Never use Make Some Noise's logos or trademarks unless approved to do so. Permission to use logos should be requested from the Chief Executive Officer or Head of Operations & Programmes.
- Always protect yourself and the charity. Be careful with your privacy online and be cautious when sharing personal information. What you publish is widely accessible and will be around for a long time, so do consider the content carefully. When you are using social media sites at work, it is important that you do so safely. You can find more information on your responsibilities when using our computer systems in our IT & Internet Policy
- Think about your reputation as well as the charity's. Express your opinions and deal with differences of opinion respectfully. Don't insult people or treat them badly. Passionate discussions and debates are fine, but you should always be respectful of others and their opinions. Be polite and the first to correct your own mistakes
- We encourage team members to share tweets and posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support Make Some Noise and the work we do. Where appropriate and using the guidelines within this policy, we encourage team members to do this as it provides a human voice and raises our profile. However, if the content is controversial or misrepresented, please highlight this to the Chief Executive Officer or Head of Operations & Programmes who will respond as appropriate.

#### FURTHER GUIDELINES

##### **Libel**

Libel is when a false written statement that is damaging to a person's reputation is published online or in print. Whether team members are posting content on social media as part of their job or in a personal capacity, they should not bring Make Some Noise into disrepute by making defamatory comments about individuals or other organisations or groups.

##### **Copyright law**

It is critical that all team members abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988. Never use or adapt someone else's images or

written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

**Confidentiality**

Any communications that team members make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information that Make Some Noise is not ready to disclose yet. For example, a news story that is embargoed for a particular date.

**Discrimination and harassment**

Team members should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official Make Some Noise social media channel or a personal account. For example:

- making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, age, religion or belief
- using social media to bully another individual
- posting images that are discriminatory or offensive or links to such content.

**Use of social media in the recruitment process**

Recruitment should be carried out in accordance with associated procedures and guidelines. Any advertising of vacancies should be done through the Chief Executive Officer and Head of Operations & Programmes. Vacancies are shared on all Make Some Noise's social media accounts.

There should be no systematic or routine checking of candidate's online social media activities during the recruitment process, as conducting these searches might lead to a presumption that an applicant's protected characteristics, such as religious beliefs or sexual orientation, played a part in a recruitment decision. This is in line with Make Some Noise's Equal Opportunities Policy.

**Protection and intervention**

The responsibility for measures of protection and intervention lies first with the social networking site itself. Different social networking sites offer different models of interventions in different areas. For more information, refer to the guidance available on the social networking site itself. For example, Facebook. However, if a team member considers that a person/people is/are at risk of harm, they should report this to the Chief Executive Officer or Head of Operations & Programmes immediately.

Under 18s and vulnerable people: Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old via social media, team members should ensure the online relationship with Make Some Noise follows the same rules as the offline 'real-life' relationship. Team members should ensure that young people have been made aware of the risks of communicating and sharing information online and given guidance on security/privacy settings as necessary. Team members should also ensure that the site itself is suitable for the young person and Make Some Noise content and other content is appropriate for them.

Under no circumstances should Make Some Noise's team members use their own personal social networking pages to communicate with participants or members of the public professionally and on behalf of Make Some Noise. This will be deemed a breach of professional standards which may result in formal action being taken in accordance with the policies detailed.

**Responsibilities and breach of policy**

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of Make Some Noise is not a right but an opportunity, so it must be treated seriously and with respect.

For team members, breaches of policy may incur disciplinary action, depending on the severity of the issue. Please refer to our Disciplinary Policy for further information on disciplinary procedures. Team members who are unsure about whether something they propose to do on social media might breach this policy, should seek advice from the Chief Executive Officer or Head of Operations & Programmes.

**Public Interest Disclosure**

Under the Public Interest Disclosure Act 1998, if a team member releases information through Make Some Noise's social media channels that is considered to be in the interest of the public, Make Some Noise's Whistleblowing Policy must be initiated before any further action is taken.

**SECTION 6: ONLINE LEARNING & DELIVERY POLICY****Safeguarding & Location of Session**

- To ensure we follow good Safeguarding practice, Music Leaders will provide professional delivery and if the session doesn't feel right for any reason (e.g. behaviour, participant attitude etc.) the session will be ended and parents/Carers will be emailed with the reason why
- Session should take place where young people can be supervised and should be in a family room not a bedroom. Parents/Carers should be present at the beginning and end of the session and ideally should be around to help / supervise if required
- The session environment needs to be as quiet and undisturbed as possible
- Parents / Carers can make themselves known to the Music Leader on the Zoom/Teams call
- Children/Young People and Music Leader will need to dress appropriately for the session to ensure that all involved feel comfortable. Music Leaders should wear their lanyards and/or Make Some Noise T-shirt
- Please try to make sure that the room is well lit
- Position the device a suitable distance for the Music Leader to see the participant play and perform; too close will distort the sound
- As and when required, Music Leaders may have to record sessions on Zoom/Teams. These recordings will be saved securely and kept for 6 months after the project end. These are used only for safeguarding purposes and not viewed unless required due to a concern being raised.

**Considerations when Delivering**

- Speak clearly and at a suitable pace
- Be aware of a slight time delay during session
- Accompanying and playing along will be difficult (maybe impossible...) so you will need to adapt your sessions accordingly
- Try to light the room as much as possible so that the view of you is clear
- Experiment before the session with camera angles and distance from yourself / instrument you will be teaching on. Being too close may not allow you to demo and the sound may be distorted
- Planning for group sessions will need to be approached differently, as participants will not be able to play/sing together
- Try to avoid interruptions such as family members walking in, dogs barking etc
- The first session in part, will be about making sure that everything works and that you and your pupil get used to the nature of the session via video link
- Please do ensure you take regular breaks and allow transition time between slots (think of this as travel time)
- Trial the use of headphones, it may improve sound quality.

**Considerations for parents/carers**

- Session times will need to be adhered to closely so please ensure that participants have the all they need for the session ready for the start
- Encourage your participant to engage with this way of learning, concentrate and work hard so that we can work to make it a valuable experience. We know it will be a very different experience from sessions face to face
- Please encourage your child to practice between sessions so that good progress can continue to be made, this can be incorporated into your daily routine
- Please be patient with this form of delivery. It will feel very different to a face to face session as there are some methods and approaches that will not work over a live video (e.g. participants playing/singing together)
- Music Leaders will offer flexibility of session times where possible and will try to keep existing groups together.

**Internal Resources Available**

Make Some Noise Guide for Music Leaders – Digital Learning

Make Some Noise Guide for Parents – Digital Learning

**SECTION 7: The Recruitment of Ex-Offenders Procedure**

Make Some Noise is committed to safeguarding the wellbeing of the children, young people and vulnerable adults we work with, within a culture that gives safeguarding the highest priority.

All members of the Make Some Noise team will be recruited in accordance with the organisation's Safeguarding Policy and vetted to set standards including appropriate background checks such as satisfactory references and (where the role meets the legal criteria) a relevant Disclosure and Barring Service check. For roles working directly with children and young people or vulnerable adults this will include an Enhanced (with Barred List) check.

Having a criminal record will not necessarily bar applicants from working for Make Some Noise. This will depend on the nature of the position and the circumstances and background of offences.

**Filtering of old and minor cautions and convictions**

On 29 May 2013, legislation came into force that allows:

- certain old and minor cautions and convictions to no longer be subject to disclosure
- employers will no longer be able to take an individual's old and minor cautions and convictions into account when making decisions
- all cautions and convictions for specified serious violent and sexual offences, and other specified offences of relevance for posts concerned with safeguarding children and vulnerable adults, will remain subject to disclosure
- all convictions resulting in a custodial sentence, whether or not suspended, will remain subject to disclosure, as will all convictions where an individual has more than one conviction recorded

Further guidance and criteria is [available here](#) which explains which offences etc are now 'protected' so not subject to disclosure to employers.

**Please note that:**

- As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, Make Some Noise complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed
- Make Some Noise is committed to the fair treatment of members of the Make Some Noise team and users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/ mental disability or offending background
- We have a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the outset of the recruitment process

### **Section 7: The Recruitment of Ex-Offenders Procedure**

- We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience
- A DBS check is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, all application forms, job adverts and recruitment briefs will contain a statement that a DBS check will be required in the event of the individual being offered the position
- Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Make Some Noise, and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process
- Unless the nature of the position allows Make Some Noise to ask questions about your entire criminal record, we only ask questions about 'unspent' convictions as defined by the Rehabilitation of Offenders Act 1974
- We ensure that all those in Make Some Noise who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974, and also other relevant legislation such as the Safeguarding Vulnerable Groups Act 2006
- At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- We make every subject of a DBS check aware of the existence of the Code of Practice and make a copy available on request
- We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.