



Entelechy Arts Safeguarding Policy

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Introduction

Entelechy Arts is committed to safeguarding and promoting the wellbeing and independence of all participants, volunteers, trustees, partners, staff and anyone working on behalf of Entelechy Arts who are experiencing or are at risk of abuse and neglect. This Policy sets out the regulatory framework within which safeguarding sits and the framework and processes the organisation has in place to ensure that all statutory, regulatory and good practice requirements are met. Entelechy Arts' activities' focus is centered on individuals over 18. As of February 2022, we carry out limited work with under 18s, and only within a school setting with more information provided later in this document.

Our commitment to Safeguarding

We will take every reasonable step to fulfil our professional responsibilities in ensuring adults at risk are protected. All concerns, suspicions and allegations of abuse will be taken seriously and responded to non-judgementally, swiftly and appropriately, in accordance with these procedures. We will ensure that our safeguarding procedures are embedded and abided by through regular mandatory training for volunteers, trustees, partners and staff (hereinafter defined as individuals) to enable informed and confident decisions to be made. All staff, volunteers, trustees, partners and anyone working on behalf of Entelechy Arts are required to read, confirm their understanding of and commitment to adhering to this policy and procedures.

The policy will be agreed formally by Trustees and will be reviewed bi-annually from the date of the last review. During this period any changes in statutory or regulatory requirements requiring amendments to this policy will be included and the policy resubmitted to Trustees for agreement.

Statutory and regulatory requirements

The requirements of this policy take account of the relevant clauses in the following legislation and statutory guidance. Direct links are provided to the relevant documents.

- [The Care Act 2014](#)
- [Care Act 2014 Statutory Guidance](#)
- [Mental Capacity Act 2005](#) (incl. Deprivation of Liberty Safeguards)
- The [Human Rights Act 1998](#)
- The [Equality Act 2010](#)
- [Mental Health Act 1983](#) and the [Code of Practice 2015](#)
- [Serious Crime Act 2015](#)
- [Modern Slavery Act 2015](#)
- [Criminal Justice and Courts Act 2015](#)
- [Statutory Guidance on Female Genital Mutilation](#)
- [The Protection of Freedom Act](#)
- [The Data Protection Act 2018](#)

Safeguarding Lead

The Charity Commission expects any organisation who works with children or adults at risk to have a Safeguarding Lead. This individual will be the Single Point of Contact (SPOC) for the organisation and will have the required knowledge, experience and skills to fulfil the duties required. The SPOC, the General Manager and the Board Safeguarding lead will undertake SOVA Level 3 training to undertake this role and will also undertake any further training as required by changes in legislation or good practice requirements. The SPOC will adhere to Lewisham Safeguarding Adults Board (LSAB) [guidance](#).

The SPOC is responsible for:

- a) providing advice on safeguarding including assessing if a concern is a safeguarding issue
- b) reporting of concerns to the relevant local authority safeguarding lead
- c) ensuring that records are kept of any reporting

- d) maintaining a written record of all safeguarding activity that has taken place within the organisation
- e) any concerns that have been reported to the local authority or the Metropolitan Police
- f) providing anonymised reports to trustees on an annual basis on safeguarding activity
- g) ensuring that this policy is adhered to by all volunteers, trustees, partners and staff
- h) Entelechy Arts works in partnership with the Albany on a number of projects. The named safeguarding lead for each project will depend on which organisation is in receipt of the funding and will therefore be either the Entelechy Arts SPOC as below or the Albany SPOC as named below.

Entelechy Arts SPOC contact

Name: Mike Brooks
Post: Director
From date: 1 January 2023

If the SPOC is not in work the Office Manager should be informed who will take the necessary action.

Name: Katie Gill
Date: 2nd April 2024

If neither the Safeguarding lead nor the Office Manger are available, then the Board Safeguarding Lead, Jane Senior, should be informed.

Training in Safeguarding

Entelechy Arts commits to ensuring that:

- All current staff, trustees, volunteers and partners receive training in this revised policy and procedures.
- Any new trustee, member of staff, volunteer or partner is provided with the policy and receives appropriate training as required.
- Each staff, volunteer and partner role is assessed by the Safeguarding lead and the relevant manager to assess the level of safeguarding training the role requires and ensures that this training is undertaken
- All staff, trustees, volunteers and partners undertake basic level training in safeguarding
- The SPOC, their deputy and the Board's Safeguarding Lead will undertake SOVA Level 3 training
- All staff, trustees, volunteers and partners undertake 'refresher training' at least every two years or as required
- That we keep records of all training undertaken and the dates undertaken

Safeguarding Adults

The Care Act 2014 Guidance defines safeguarding as protecting an adult's right to live in safety, free from abuse and neglect. It further states that it is about people and organisations working

together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. Within this context, the guidance recognises that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Abuse and neglect can take many forms and it is important that individuals working across the organisation should not be constrained in their view of what constitutes abuse or neglect, and the circumstances of an individual case should always be considered. For further advice and information please read the London Borough of Lewisham Safeguarding Vulnerable Adults page included here. If you have a concern about a participant or a colleague and you are unsure about whether your concern is a safeguarding issue, please discuss this with the Safeguarding lead.

All volunteers, trustees, partners, staff and anyone working on behalf of Entelechy Arts are required to undertake a bi-annual DBS check, which the organisation's Safeguarding Lead, Director or General Manager must deem to be satisfactory. These DBS checks will be paid for by the organisation. For more information on DBS checks please [click here](#). Entelechy Arts will treat any DBS applicant with a criminal record fairly and will not discriminate because of a conviction or other information revealed if this information does not indicate that the individual might be a risk.

Responding to a safeguarding concern that arises during an Entelechy Arts activity

It should be noted that abuse and neglect can take many forms both physical and mental and essentially there are two types of safeguarding concerns:

- a) where an individual discloses abuse
- b) where a volunteer, trustee, partner, staff member or anyone working on behalf of Entelechy Arts observes what they feel may be abuse (observational)

The process of responding to a concern is detailed briefly below:

For both **a** and **b**, your response must be non judgemental and you should not express an opinion or ask for information. You should just listen to what the individual is saying where there is a verbal disclosure. You should discuss this with your manager and the SPOC. You must not discuss this with anyone else, including:

- The individual's carers, friends and family
- other Entelechy staff, partners and participants
- non-Entelechy staff
- your friends and family

The only exception to this is where the responsibility for Safeguarding lies with a partnership organisation or school.

Please ensure that you adhere to the requirements as detailed in **Data Sharing**. You must keep a record of the concern and action taken as described in **Record Keeping**

The process of responding to a concern arising during an Entelechy Arts activity is presented in more detailed visual form.

The process of responding to a concern that arises during an activity delivered with a partnership organisation should be responded to as detailed below.

Record keeping

Written records should be kept on the incident/disclosure and uploaded to the CRM as soon as possible, and within 24 hours of the disclosure. Notes should not be taken when you are talking with the individual who has disclosed but should be made as soon as possible after disclosure. These notes should include:

1. date, time and whereabouts of disclosure
2. what was reported, using the individual's own words. If the individual is non verbal then clear, objective notes should be taken including any observations as per items **3-5**.
3. If your observation is that the individual's appearance is very different from their usual appearance and that was a concern
4. If your observation is that the individual's behavior is very different from their usual behavior and that was a concern
5. If you observed the incident yourself
6. Names of any managers who were consulted
7. What action was taken/is being taken

These records should be updated as required with the consequences of the reporting.

Data sharing

The Data Protection Act 2018 controls how an individual's personal information is used by organisations, businesses or the government. The act applies to safeguarding issues and provides the framework to ensure that personal information about an individual is shared appropriately. Records of safeguarding concerns should be kept on the database and are required to be written and uploaded in a timely manner (i.e. as soon after the incident as possible), accurate, without speculation and give details of any and decisions taken. Key issues to be aware of are

- being open and honest with the individual that your concerns may be shared with others. If they refuse to allow this and are deemed to have the capacity to refuse, the issue should be discussed with the Safeguarding Lead as to whether concerns over abuse and the individual's safety take precedence over their refusal.
- If the individual is non verbal, you should discuss with the Safeguarding lead the individual's capacity or otherwise to refuse disclosure, who will make the decision.
- you should not promise the individual who made the disclosure that you can keep it secret as you have a duty of care to ensure the safety of that individual.
- you should not discuss your concerns with anyone other than the Safeguarding lead and your manager, as detailed more fully above.

Partnership arrangements working

Entelechy Arts has many longstanding partnership arrangements with a number of local and national organisations, including the Albany theatre. This Safeguarding Policy is aligned with the Albany's Safeguarding Policy with regards to jointly managed activities. When working with other partners on projects with adults, we will ensure that:

- We share our Safeguarding Policy with partner organisations
- We will request and review Safeguarding Policies from our partners
- The named SPOC will be from the lead organisation, defined as the organisation which holds the funding.
- Safeguarding issues will follow the same process as described in **Record Keeping**

Children and Young People Safeguarding

Entelechy Arts does not work with children and young people under the age of 18 on a regular basis, however, we currently have one programme as part of Ambient Jam that collaborates with secondary schools and their pupils.

Safeguarding statement: We recognise that children and young people should never experience abuse of any kind and that we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

When working with schools i.e. under 18s, in addition to the principles outlined above, an agreement will be in place that the Safeguarding processes to follow are those of the school:

- We will share our Safeguarding Policy with the school
- We will request and review the school's Safeguarding Policy
- Prior to any activity, all artists and staff working on the project will familiarize themselves with the requirements of the school's safeguarding policy and process
- Prior to any activity, all artists and staff will ascertain who is the safeguarding lead for that day and activity
- All artists and staff must report any concern / disclosure to the safeguarding lead
- Safeguarding issues will follow the same process as described in **Record Keeping**

Digital Safeguarding

Digital safeguarding means: 'the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents'.

Entelechy Arts is committed to the safeguarding and protection of all members, volunteers, staff and users of our digital services and social media channels.

This means protecting our members, volunteers and staff from online harm such as:

- Online bullying and harassment
- Discrimination and abuse on the grounds of any protected characteristics
- Sharing of illegal and inappropriate imagery
- Cyberstalking

- Impersonation and hacking
- Disinformation and misinformation
- The oversharing of personal information

The measures we take to protect our staff, members and volunteers from harm are as follows:

- Permission is sought from all individuals to consent to photos and / or videos being taken of them, and used online by Entelechy Arts.
- Recordings of this permission is kept securely on the organisation's CRM system.
- Individuals can withdraw permission at any time.
- Unless necessary and permission given, full names are not disclosed on our online platforms.
- Staff, volunteers and contractors for Entelechy Arts are not permitted to share photographs of any members, or disclose names or any personal information on their own personal social media platforms, unless it has already been shared by Entelechy Arts (and therefore has permission to be so).
- Staff, volunteers and contractors for Entelechy Arts are not permitted to connect online with members, or via WhatsApp, text message or phone call outside of a work context.
- All communication exchanges with members are recorded on the organisation's CRM system.