

Entelechy Arts

Safeguarding – A Self-assessment Framework

Protecting people and safeguarding responsibilities should be a governance priority for all charities. It is a fundamental part of operating as a charity for the public benefit.

Trustees must ensure that reasonable steps are taken to protect from harm people who come into contact with the organisation.

This includes:

- people who benefit from your charity's work
- staff
- volunteers
- other people who come into contact with the charity through its work

Trustees should promote an open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to.

All Trustees are expected to make sure that their charity:

- has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries
- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant agencies as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register which is regularly reviewed
- follows statutory guidance, good practice guidance and legislation relevant to their charity: this guidance links to the main sources of information
- is quick to respond to concerns and carry out appropriate investigations
- does not ignore harm or downplays failures
- has a balanced trustee board and does not let one trustee dominate its work – trustees should work together
- makes sure protecting people from harm is central to its culture
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people

- conducts periodic reviews of safeguarding policies, procedures and practice

Read [NCVO's safeguarding resource](#) for advice on how to get started with safeguarding.

Read the [Charity Governance Code](#) for best practice advice including on safeguarding.

Read [Bond's 'Good governance for safeguarding'](#) for support on developing good practice on governance.

If you work with children or adults at risk there are more safeguarding legal requirements. You must check whether these requirements apply to your charity. If they do, you must work within them.

Types of Risks and Harms

The Charity, its trustees, staff and volunteers must be alert to the types of harms and risks which can occur either on-line or in person.

These include:

- sexual harassment, abuse and exploitation
- criminal exploitation
- a charity's culture, which may allow poor behaviour and poor accountability
- people abusing a position of trust they hold within a charity
- bullying or harassment
- health and safety
- commercial exploitation
- cyber abuse
- discrimination on any of the grounds in the Equality Act 2010
- people targeting your charity
- data breaches, including those under General Data Protection Regulations (GDPR)
- negligent treatment
- domestic abuse
- self-neglect
- physical or emotional abuse
- extremism and radicalisation
- forced marriage

- modern slavery
- human trafficking
- female genital mutilation

This framework is taken from the government website: [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Safeguarding Self-Assessment – Entelechy Arts

Summer / Autumn 2023

Ref		Current Measures	Action Required	Target Date
1	Safeguarding Policies and Procedures			
1.1	<p>The organisation has policies and procedures in place to keep people safe.</p> <p><i>(What policies and procedures relating to safeguarding and keeping people safe does the organisation have? Do policies and procedures have regard for the type of risks and harms listed above. List out the existing policies and procedures in the Current Measures column. Would expect Safeguarding, Health and Safety, Staff Welfare, Bullying and Harassment, Disciplinary Procedure, Complaints Policy, Whistleblowing, Volunteer Policy, Safer Recruitment Policy, Diversity Policy, First Aid, Fire Safety, Digital Safety, Safeguarding Vulnerable Adults, Safeguarding Children as a minimum etc.</i></p> <p><i>Are any additional policies and procedures required?)</i></p>	<ul style="list-style-type: none"> • Safeguarding – Y, to be approved June 2024 • Health and Safety – Y, last updated 2023 • Staff Welfare – Not specifically • Bullying and Harassment – No • Disciplinary Procedure – covered to an extent in employment contract • Disciplinary and grievance policy - No • Complaints Policy – Y • Whistleblowing – Y • Volunteer Policy – Y, last updated 2023 • Safer Recruitment Policy • Diversity Policy, Y • First Aid – N • Fire Safety - covered in risk assessments and by The Albany’s policies • Digital Safety – ‘Digital Safeguarding’ section in the Safeguarding Policy 	<ul style="list-style-type: none"> • Formulate and approve missing policies in place for 2024/25. 	June 24

Ref		Current Measures	Action Required	Target Date
		<ul style="list-style-type: none"> Safeguarding Vulnerable Adults – covered by Safeguarding policy 		
1.2	<p>Policies and procedures are put into practice.</p> <p><i>(How can the organisation demonstrate that policies and procedures are put into practice. Eg Policies and procedures are built into new starter induction packs – volunteers, Trustees and Employees, on-line training, testing knowledge at interview, available on the website, training etc, regular review)</i></p>	<ul style="list-style-type: none"> Policies and procedures are built into new starter induction packs and Staff Handbook along with a requirement that staff, volunteers and trustees should familiarise themselves with the policies. Volunteers – yes with AJ and Meet Me weekly briefings Trustees and Employees On-line training Testing knowledge at interview Available on the website Training Regular review 		
1.3	<p>Policies and procedures are responsive to change.</p> <p><i>(How does the organisation track changes in legislation and statutory guidance, how are policies and procedures amended to reflect these, do policies and procedures take account of current affairs, trends and themes, is anyone in the organisation responsible for making these changes, when were policies and procedures last updated?)</i></p>	<ul style="list-style-type: none"> Annual health-check. Annual update of all policies and a log to track when each policy is updated. Ongoing updating of legislation and statutory guidance from trustees and staff, reported at quarterly board meetings. 	n/a	n/a

Ref		Current Measures	Action Required	Target Date
1.4	<p>Policies and procedures are reviewed as necessary, always following a serious incident and at least once a year. Trustees are assured that all policies, procedures and practice are checked and challenged to ensure that they are fit for purpose?</p>	<ul style="list-style-type: none"> • Safeguarding lead and chair are briefed on all serious incidents. • Annual update of all policies. • Ongoing updating of legislation and statutory guidance from trustees and staff, reported at quarterly board meetings. • All policies and updates to policies signed off by board. 	<ul style="list-style-type: none"> • Create log of policies and conduct an annual review every September? • Create standing item for Safeguarding at main board meetings for reviewing both the log and policies 	Sept 2024
1.5	<p>Policies and procedures are available to the public</p> <p><i>(How can the public – including members, funding bodies, family members etc, be assured that adequate safeguarding policies and procedures are in place, are these published on the website, is there a statement setting out that the organisation takes safeguarding seriously and understands its responsibilities?)</i></p>	<ul style="list-style-type: none"> • Published on the website - N • Statement setting out that the organisation takes safeguarding seriously and understands its responsibilities - N 	<ul style="list-style-type: none"> • Create a page on the website with statement and links to all policies. 	June 2024
1.6	<p>Policies and Procedures are written in accordance with the relevant legislation.</p>		<ul style="list-style-type: none"> • Need to ensure the following policies 	June 2024

Ref		Current Measures	Action Required	Target Date
	<p><i>(Policies and procedures are written with regard to relevant legislation, including; Care Act 2014, Working Together to Safeguard Children – updated July 22, Equality Act 2010, Health and Safety at Work etc.</i></p> <p><i>Is the Charity linked in with local forums eg The Safeguarding Partnership)</i></p>		<p>reference appropriate legislation:</p> <p>Safeguarding, principally with reference to the Care Act 2014, and the Diversity Policy, with reference to the Equality Act 2010.</p>	
1.7	<p>Trustees, staff, volunteers, partners and beneficiaries are aware of policies and procedures and know how to apply them including how to raise concerns.</p> <p><i>(Is there access to safeguarding information in Newsletters, Board briefings. Is any training available to Board members, volunteers and associates – on line or in person.)</i></p>	Policies are listed in Staff Handbook.	<ul style="list-style-type: none"> • Create link to each policy on web-site 	June 2024
1.8	<p>Every trustee should have clear oversight of how safeguarding and protecting people from home is managed within the charity.</p>	This document begins a process of sharing safeguarding on a regular basis with the entire board, including at the AGM in Dec 2023 and quarterly meetings through 2024. The document is always available for trustees to scrutinised and	n/a	n/a

Ref		Current Measures	Action Required	Target Date
	<p>Performance should be monitored with supporting information such as qualitative reports as well as statistics.</p> <p><i>(How is oversight of safeguarding matters reported to the Board? Is this sufficient?)</i></p>	can be referenced at safeguarding meetings every six weeks.		
2	Code of Conduct			
2.1	<p>The organisation must have a Clear Code of Conduct which sets out:</p> <p>The Organisations Culture and Values.</p> <p>How People should behave.</p> <p><u>Read the Charity Governance Code.</u></p> <p>NCVO's <u>Charity Ethical Principles</u> provides help with policies on recognising and resolving ethical issues when considering your code of conduct.</p> <p><i>(Is there a Code of Conduct? Are all trustees, volunteers, staff members, associates et required to sign this and this is kept on file? Is there a periodic review of the Code of Conduct eg annual review at Board Meetings, are breaches recorded?)</i></p>	Yes. Breaches are recorded in the safeguarding log. We do request signatures from associates via the artist contracts, but not from volunteers (our code of conduct is repeated before each session.)	n/a	n/a

Ref		Current Measures	Action Required	Target Date
3	Risk Management			
3.1	<p>Trustees are aware of any risks concerning safeguarding and measures in place to mitigate these.</p> <p><i>(Does the organisation retain a risk register? Is the Board sighted on this and engaged in discussions around mitigating actions, Is there a standing item on Board Agendas regarding risks and lessons learnt.)</i></p>	<ul style="list-style-type: none"> • Risk register updated on a weekly basis as when changes occur or risks are identified. • Risk register presented to both Finance Audit & Risk sub-committee meetings and full board meetings as a standing item, totalling 8 times per year. • Risk register shared quarterly with our largest funder ACE. 	n/a	n/a
3.2	<p>Checks on other sites</p> <p><i>(Does the charity carry out checks on any sites your charity works with and ask to see necessary paperwork eg Health and Safety / Risk Assessments)</i></p>	Yes, though a formal log of these checks would be reassuring.	<ul style="list-style-type: none"> • Obtain information on fire testing, gas safety, electricity safety, and other possible hazards from Rebecca on AJ, Beckie for Tea dance and Glorious Age, Becky for HOME tour, Roxanna for WWSou workshops. 	Ongoing
3.3	<p>Engaging with statutory partners?</p> <p><i>(Does the charity engage with statutory partners and raise issues and seek advice as necessary? Is the charity linked in with the Local Safeguarding Partnership <u>Lewisham Safeguarding</u>, <u>Lewisham Safeguarding Children Partnership</u>, <u>Lewisham</u></i></p>	Yes. Signed up to Lewisham Safeguarding board Requesting access to memberships/member's area.	n/a	n/a

Ref		Current Measures	Action Required	Target Date
	Safeguarding Adults Board (safeguardinglewisham.org.uk)			
4.0	Checks on Trustees, Staff and Volunteers			
4.1	<p>Trustees, staff, associates and volunteers are suitable and legally able to act in their positions.</p> <p>Does the charity gather:</p> <ul style="list-style-type: none"> - Criminal Records Checks - Reference Checks - Confirmation that staff can work in the UK - Health Checks. - Check for any conflicts of interest and ensure that these are declared? <p>If the Charity seeks DBS checks, does it have a policy on General Data Protection Regulations (GDPR) and a policy on the recruitment of ex-offenders.</p> <p>The DBS has guidance on this.</p>	<ul style="list-style-type: none"> • Criminal Records Checks - Y • Reference Checks - Y • Confirmation that staff can work in the UK - Y • Health Checks - Y • Check for any conflicts of interest and ensure that these are declared? - Y 	n/a	n/a

Ref		Current Measures	Action Required	Target Date
4.2	<p>The organisation understands the use of DBS Checks.</p> <p><i>Do Trustees risk assess all roles to determine if roles are eligible for DBS checks?</i></p> <p><i>Does the organisation use DBS <u>eligibility checker</u> and <u>guidance leaflets</u> to decide what checks to make.</i></p> <p><i>If the Charity seeks DBS check. Does it have a policy on General Data Protection Regulations (GDPR) and a policy on the recruitment of ex-offenders.</i></p> <p><i>The DBS has <u>guidance</u> on this.</i></p> <p><i>Does the organisation have a process for getting checks for trustees, staff or volunteers from overseas?</i></p>	<ul style="list-style-type: none"> • Staff team yes and all roles that directly interact with members. • Trustees no. 	n/a	n/a
4.3	<p>Automatic Disqualification</p> <p>The organisation has a policy not to appoint anyone who is disqualified as a trustee or to a senior manager position.</p>	No	<ul style="list-style-type: none"> • Automatic Disqualification to be added to recruitment policy and trustees recruitment pack. 	June 2024

Commented [Office1]: Is this written down anywhere

Ref		Current Measures	Action Required	Target Date
	https://www.gov.uk/guidance/automatic-disqualification-rule-changes-guidance-for-charities			
5	Organisational Culture and Protecting Volunteers, Staff, Partners and Associates from Harm.			
5.1	The organisation creates a culture of openness so that all staff, volunteers and associates feel able to raise any concerns.	<p>Staff, volunteers and associates are reminded of the processes for raising concerns (and their responsibility to do so) at each briefing session prior to daily activity, e.g. the Meet Me volunteer briefing on a Tuesday, the artist briefing before every Ambient Jam.</p> <p>In 2023 this led to two concerns being raising and addressed appropriately.</p>	n/a	n/a
5.2	The organisation actively seeks to instil a positive culture which is anti-bullying. https://www.acevo.org.uk/reports/in-plain-sight/			

Ref		Current Measures	Action Required	Target Date
5.3	<p>The organisation has appropriate policies in place to cover:</p> <p>Bullying Harassment Whistleblowing</p>	Bullying and Harassment – New Whistleblowing - New	Standalone policies required for Bullying, Harassment and Whistleblowing	June 24
6	Insurance			
6.1	<p>The organisation has appropriate insurance in place which covers all individuals and activities involved.</p> <p>https://www.gov.uk/government/publications/charities-and-insurance-cc49</p>	Public Liability & Employers liability – this is reviewed and renewed in November each year. In November 2023 our policy was enhanced to include cyber security.	n/a	n/a
7	Safeguarding Children or Adults at Risk			
7.1	<p>The charity has appropriate policies in place to safeguard children or adults at risk which fit with the policies and procedures of the local authority safeguarding boards.</p> <p>(see 1.1)</p>	All current policies fit with and reference the requirements of LB Lewisham Safeguarding Board.	<ul style="list-style-type: none"> Ensure the same approach for new policies including Bullying and Whistleblowing 	June 24

Ref		Current Measures	Action Required	Target Date
7.2	<p>Staff and volunteers receive regular training on child protection or working with adults at risk.</p> <p><i>(Information on training is circulated and attendance is monitored)</i></p>	Yes to a point, this could be rolled out across the team and formalised in a schedule of training and updates.	<ul style="list-style-type: none"> • Create and maintain live list of who has had training, including and level. 	Sept 23
7.3	The charity appoints a safeguarding lead to work with your local authority safeguarding partnership or boards.	Mike, as Interim director, is currently the safeguarding lead.	n/a	n/a
7.4	The charity manages concerns, complaints, whistleblowing and allegations relating to child protection and adults at risk effectively.	Yes, and retains a log of all complaints which have been made and the outcomes from these, requesting feedback when appropriate from complainants, partners and individuals raising concerns.	n/a	n/a
7.5	The Charity has identified the local authority safeguarding boards.	Yes, Lewisham Safeguarding board. We receive bulletins and circulates training information to staff, trustees and volunteers.	n/a	n/a
7.6	The Charity understand that safeguarding children duties apply to any charity	We do not work with anyone under the age of 18. There are instances (for example events open to the public)	n/a	n/a

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Ref		Current Measures	Action Required	Target Date
	<p>working with, or coming into contact with, anyone under the age of 18. This includes:</p> <ul style="list-style-type: none"> • Protecting children from abuse and maltreatment • Preventing harm to children’s health or development • Ensuring children grow up with the provision of safe and effective care • Taking action to enable all children and young people to have the best outcomes. <p>(Aware of resources contained within Working together to safeguard children - GOV.UK (www.gov.uk)</p> <p>NSPCC NSPCC safeguarding standards and guidance NSPCC Learning</p>	<p>where children and young people might attend with a parent or carer.</p>		
7.7	<p>The Charity understands that safeguarding adults at risk means protecting their right to live in safety and free from abuse and neglect. The charity might have trustees, staff, volunteers, beneficiaries or other connections who are classed at adults at risk.</p>	<p>We have appropriate policies and procedures in place, in keeping with our remit as a Charity working with people suffering from the effects of isolation, and publish these policies publicly. These policies and procedures reference appropriate legislation such as the Care Act 2014 and Equalities Act 2010.</p>	n/a	n/a

Ref		Current Measures	Action Required	Target Date
	<p>Safeguarding duties for adults at risk apply to any charity working with anyone over the age of 18 who:</p> <p>Has needs for care and support (whether or not the LA is meeting any of those needs.)</p> <p>Is experiencing or at risk of abuse or neglect.</p> <p>As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.</p> <p>An adult at risk of abuse may:</p> <ul style="list-style-type: none"> • have an illness affecting their mental or physical health • have a learning disability • suffer from drug or alcohol problems • be frail 			

Name(s) of Entelechy Staff Member Completing Self Assessment	Position (s)	Date Completed

Mike Brooks	Director	June 13 th 2024

Date(s) Reviewed at Entelechy Board Meeting	Approved by chair
June 18 th 2024	Paul Cann