



## Health and Safety Policy

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## Section A: Policy Statement

Point Blank believes a positive health and safety culture in the workplace to be fundamental to its operation and complementary to its business aims. Management will work with staff to achieve this through the identification, analysis, control, elimination and reduction of risks.

We recognise our responsibility for the implementation, development and maintenance of health, safety and welfare arrangements for our sites. We will aim to set standards that achieve the objectives set out in the Health and Safety Policy Document.

We will fulfil our duty of care by providing premises, plant, means of access and egress and systems of work that are safe and without risk to the health of our staff, or others affected by our undertaking, such as contractors, visitors and the public.

Our employees will be provided with the necessary information, training, instruction and supervision to ensure all work is conducted with minimal risk to safety and health and with full knowledge of the hazards at work.

We expect our employees to co-operate with the management to ensure the above standards are achieved by performing their work duties and tasks in a safe and healthy manner and for observing and following all corporate "Health and Safety" policies and procedures, by identifying and reporting hazards and by working with us to raise standards in the workplace.

This policy covers the procedure across all Point Blank campus sites, namely 23-28 Penn St, London N1 5DL and 26 Orsman Road, London N1 5QJ.

This policy will be reviewed **annually**.

Approval Given By: **Jules Brookes**

Date of Approval: **1<sup>st</sup> Sept 2015**

Date of Next Review: **31<sup>st</sup> Aug 2016**

# Section B: Organisational Responsibilities

## 1 EMPLOYER'S RESPONSIBILITIES

1.1 In keeping with the above policy statement and the need to ensure compliance with the Health and Safety at Work etc Act 1974 and other relevant health and safety legislation, Point Blank Limited will:

- provide adequate control of the health and safety risks arising from its work activities;
- consult with its employees on matters affecting their health and safety;
- assess the risks to the health and safety of anyone affected by work activities;
- provide information, instruction and supervision for employees appropriate to their roles;
- ensure all employees are competent, and give them adequate training;
- provide a safe place of employment and a healthy working environment;
- provide and maintain safe plant and equipment;
- ensure safe handling and use of substances;
- review and revise this policy as necessary at regular intervals.

## 2 EMPLOYEES' RESPONSIBILITIES

2.1 All employees have a legal responsibility to take care of their own health and safety and that of others who may be affected by their acts or omissions.

2.2 Employees must co-operate with the Management on matters of health and safety and must not interfere with any item or system introduced in the interests of health and safety.

2.3 For the purpose of this policy, the 'employee' is regarded, under Health and Safety Law, as any person under the employment of the company, regardless of employment status.

## 3 ROLES

3.1 Overall accountability for Health and Safety and responsibility for monitoring the implementation of the Health and Safety policy and practice, ensuring that adequate resources are made available to allow the implementation of this policy, managing Occupational Health and ensuring confidentiality is observed on health issues and medical records lies with the Health and Safety Officer:

- **JC Concato**

3.2 Responsibility for monitoring all health and safety legislative development, recommending appropriate courses of action and developing safety management systems lies with:

- **JC Concato**

3.3 To ensure health and safety standards are maintained/ improved, specific management and control for implementing the Health and Safety Policy is delegated to the respective manager within each business area. These are:

- **Jules Brookes** - Office work area
- **David McHugh** - College area

3.4 All supervisors and managers have a duty to:

- familiarise themselves with the Health and Safety policy and procedures
- adequately supervise the work activities of employees and others under their control
- ensure that safe systems of work are followed and that the company's policies and procedures are adhered to
- ensure the implementation of Risk Management to the health, safety and welfare of staff and others at their site,
- support initiatives and training introduced in the interests of Health and Safety.

## **4 THE SAFE LEARNER**

4.1 In addition to its commitment to employees, Point Blank is equally committed to ensuring the safety of all learners. In this regard, the Company's objectives are:

- To establish and maintain safe working procedures amongst learners
- To develop safety consciousness as a general objective
- To ensure a safe environment for learning
- To ensure that competent staff are engaged
- To ensure that all premises and equipment are maintained in a safe condition
- To actively promote the 'Safe Learner' concept.

4.2 The Learner Handbook clarifies procedures which adhere to the 'Safe Learner' concept, with the goal of empowering learners with knowledge and skills that help ensure their own safety.

4.3 During the first session of any course the [#Company shall](#) explain to learners about fire procedures and other aspects of health and safety that may impact on learners.

# Section C: Procedures and Arrangements

## 1 RISK ASSESSMENT

- 1.1 All those who manage or supervise others will ensure a suitable and sufficient assessment of the risks is carried out to eliminate or reduce the risks to their employees and others while at work. Significant risks will be documented and employees informed of the results as well as the measures taken to reduce the risk, as required by the Management of Health and Safety at Work Regulations 1992.
- 1.2 Risk assessments will be reviewed at least annually or where there are significant changes to the task to which it relates, or following an accident.
- 1.3 Those required to carry out risk assessments will receive sufficient training to do so once the need is established.
- 1.4 All assessments will be signed and dated by the manager responsible, marked with a review date and kept on file.
- 1.5 Employees should report any hazardous tasks or conditions to their Manager/Supervisor so they may be assessed and appropriate control measures put in place.
- 1.6 The Company is legally required to assess the risks to pregnant women and new mothers returning to work and to monitor them throughout their pregnancy. Employees are expected to cooperate by promptly informing the management whenever compliance with these regulations is required.

## 2 FIRE SAFETY

- 2.1 Fire Risk Assessments have been carried out for all permanent sites named in this policy and will be amended and reviewed at least annually or as necessary.
- 2.2 All employees should read the Fire Action Notices provided in all areas of the workplace which give details of the building's fire and emergency procedures.
- 2.3 The named Chief Fire Warden is:
  - **JC Concato**
- 2.4 Changes to the fabric or layout of the building are likely to require an update of the fire risk assessment. Therefore all refurbishment must be approved by the Chief Fire Warden.
- 2.5 The Chief Fire Warden is responsible for ensuring safe means of escape is maintained at all times while the building is in occupation. Any obstruction to a fire route must be brought to their attention by employees. Employees must not knowingly obstruct fire routes.

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- 2.6 Regular checks will be made by the Chief Fire Warden to ensure fire prevention procedures are working.
- 2.7 All sites are provided with the appropriate number and type of portable, floor stand or wall mounted fire extinguishers with clearly displayed instructions for use. They will be easily accessible and kept clear of rubbish.
- 2.8 Fire extinguishers must only be used by those fully trained to do so, in an emergency and where safe to do so.
- 2.9 The Chief Fire Warden is responsible for ensuring the implementation of statutory requirements with regard to maintenance and testing of fire detection equipment; fire fighting equipment; emergency lighting and any other item used to protect the building and its occupants from fire.
- 2.10 The Fire Wardens are:
- JC Concato
  - David McHugh
  - Piotr Adamus
  - Krzysztof Ziolkowski
  - Yigit Bulbul
  - Ben Bristow
  - Arran Wylde
  - Gregory Dugan
  - Luca Montorsi
  - Manuel Scaramuzzino
  - Michal Vavrinec
  - Riccardo Vianello
  - Tom Hunt
  - Lain Martinez
- 2.11 All Fire Wardens will have received appropriate training and will have a clear understanding of their responsibilities.
- 2.12 Full Induction Training for new staff will include Fire Safety, and new employees will be shown the safe means of escape during their Induction.

### **3 EMERGENCY EVACUATION**

- 3.1 The Building Manager is responsible for planning and implementing Emergency Evacuation drills approximately **twice a year**.

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- 3.2 All employees should read the Fire Action Notices which give details of the building's emergency procedures. These will be clearly displayed in all permanent sites listed in this policy.
- 3.3 Fire doors will be kept unlocked [from the inside](#) and closed at all times. All staff are responsible for ensuring fire doors are closed in their areas as they leave the building during an evacuation.
- 3.4 New staff will be inducted and given a copy of procedures.
- 3.5 Employees with disabilities will be allocated a 'fire buddy'. Fire buddy's should be located within the vicinity or work area of the person requiring assistance and are responsible for ensuring that the person, who may require assistance, is alerted of the need to evacuate the building and may assist that person in the evacuation. In order to maintain the continuity of the evacuation procedures, persons should be nominated to deputise for those allocated the responsibility in their absence.
- 3.6 Contractors, temps and work experience students will also be inducted to ensure they are aware of fire exit routes and procedures for evacuation. The manager responsible for them will ensure this is carried out.
- 3.7 If a member of staff refuses to leave the building during an evacuation, or is unable to leave for health or safety reasons, the fire warden for the area will report this to the Fire Prevention Officer to ensure the emergency services are aware. Fire wardens have the authority to demand that a member of staff leaves the building if it is in the interests of Health and Safety.
- 3.8 During drills and emergency evacuations, Fire Wardens are responsible for sweeping their areas and closing any remaining fire doors behind them, as long as it is safe to do so.
- 3.9 A post evacuation de-brief will be held where necessary to discuss the event, any concerns and opportunities for improvement.
- 3.10 The Chief Fire Warden will follow up any concerns raised by evacuation personnel or staff at the earliest possible stage.
- 3.11 Pictorial symbols (white on green background) indicate Fire Routes and Fire Exits. These, together with fire alarm activation points, evacuation notices and fire—fighting equipment will be clearly marked and visible from all areas.
- 3.12 Fire Wardens will attend appropriate training in order to ensure they are familiar with site procedures and understand the action to be taken in the event of an emergency. Staff will only be considered qualified to act as Fire Wardens in evacuation once they have attended training.

#### **4 ACCIDENT AND 'RIDDOR' REPORTING**

- 4.1 In the event of an accident involving injury at work, employees must:

- Seek assistance from a First Aider,
- Ensure an Accident Report is completed (the location of accident Books/Forms at each site will be explained to you during First Day Induction) and copies sent to the necessary members of staff,
- Notify their Manager/Supervisor as soon as possible.

- 4.2 If a member of staff is absent for more than three days as a result of an accident or work-related sickness, the Health and Safety Officer must be informed so that they can report RIDDOR accidents to the Health and Safety Executive immediately.
- 4.3 Staff should judge whether there is a need for an ambulance to be called, and act accordingly. Any accidents requiring an ambulance being called or a member of staff being sent home following injury should be reported to the Health and Safety Officer.
- 4.4 The Health and Safety Officer is the main point of contact for Environmental Health Officers or Fire Officer visits at each site.
- 4.5 The Health and Safety Officer is currently responsible for post-accident investigation into the causes of accidents/incidents and for writing reports with recommendations to appropriate staff.
- 4.6 Following an accident, the Manager/Supervisor for the area is responsible for ensuring remedial action is taken to prevent a recurrence, for reviewing the relevant risk assessment and for carrying out an initial investigation.
- 4.7 Where a full investigation is needed this will be carried out by competent trained staff, or if appropriate, by a qualified third-party contractor.
- 4.8 The Health and Safety Officer will monitor accident information for trends and feed back to the Senior Management as appropriate.

## **5 FIRST AID**

- 5.1 In the event of an accident involving injury, a first aider must always be summoned to attend. The following staff have had first aid training:
- JC Concato
  - David McHugh
  - Piotr Adamus
  - Lavinia Burrell
  - Ben Bristow
  - Arran Wylde
  - Gregory Dugan
  - Luca Montorsi
  - Manuel Scaramuzzino
  - Michal Vavrinec
  - Riccardo Vianello



- Krzysztof Ziolkowski
- Tom Hunt
- Stuart McNair

- 5.2 Following an accident the attending first aider will be expected to enter details of any first aid treatment on the accident form for the injured person.
- 5.3 The Health and Safety Office will ensure first aid provision is appropriate, including equipment, personnel and first aid facilities.
- 5.4 First Aiders are responsible for replenishing First Aid Kits in their area, appropriate to the needs of that area. Suitably stocked First aid boxes are conveniently placed and signed in appropriate places within each area:
- **Meeting Room** – Cupboard nearest door
  - **Office** – Overhead kitchen storage
  - **College** – College Manager's office
- 5.5 Sufficient, qualified First Aiders are appointed at all sites and any first aider who leaves will be replaced at the earliest opportunity.
- 5.6 If a member of staff wishes to train as a first aider they should discuss this with the Group Health and Safety Officer.
- 5.7 First Aiders must undergo refresher training every three years in order to remain qualified.
- 5.8 First Aiders cannot administer any form of prescription medication nor can any prescription medication be kept in First Aid Kits.

## **6 WORKING WITH DISPLAY SCREEN EQUIPMENT (DSE)**

- 6.1 All managers will ensure workstations in their areas are assessed for risks and communicate their findings to the Health and Safety Officer.
- 6.2 Where an assessment indicates adjustments are required, responsibility for organising this lies with the Health and Safety Officer in conjunction with the relevant Manager/Supervisor.
- 6.3 Managers with staff working in DSE-intensive jobs will ensure they take regular breaks or changes of task to prevent discomfort, fatigue or stress. Exercise and relaxation techniques help reduce tension in the neck, shoulders, back and head.
- 6.4 DSE 'users' as defined by the Health and Safety (Display Screen Equipment) Regulations 1992 and established through workstation assessment, are entitled to an eyesight test at the Company's expense, once every two years, or as specified in writing by the employee's optician.

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- 6.5 For those employees who use a laptop, the working arrangement will be assessed and reasonable equipment provided to ensure there is no risk to the health or safety of the employee. This includes the means by which the equipment is transported.
- 6.6 Appropriate training and information will be given to all employees in their Induction and during the workstation assessment to ensure they are aware of the risks from working with DSE.

## 7 MANUAL HANDLING OPERATIONS

- 7.1 Where the need for a manual handling assessment is identified, the manager will carry this out and ensure all reasonable steps are taken to eliminate or reduce hazards to their lowest practicable level.
- 7.2 Where practicable, the risk should be eliminated by use of mechanical equipment, e.g lifts and sack barrows.
- 7.3 Where a residual risk remains, appropriate training and information will be provided at the earliest possible stage and renewed as necessary.
- 7.4 Where a need for personal protective equipment (PPE) is identified, suitable items will be purchased at no charge to the employee, to assist with grip when handling loads, e.g. grip gloves and outdoor clothing following consultation with those affected.
- 7.5 All items purchased in the interests of the Health and Safety of employees will be made following consultation with appropriate staff.

## 8 ELECTRICAL SAFETY

- 8.1 It is the responsibility of the Health and Safety Officer to ensure five-year testing of fixed installation electrical circuits is carried out as legally required.
- 8.2 All portable appliances will be subject to Portable Appliance Testing and a risk assessment will identify the frequency of testing for each category of items. Other items will be tested every 2-4 years such as computers and refrigerators unless moved to a different location between inspections. Some items may need to be tested more often than annually e.g. hand held electrical maintenance tools.

Equipment	Frequency of Combined inspection and testing (e.g. PAT testing)
<ul style="list-style-type: none"> <li>· Photocopiers</li> <li>· Fax machines</li> <li>· PCs</li> <li>· Printers</li> <li>· Overhead projectors</li> </ul>	<p><b>Every two to four years</b> unless:</p> <ul style="list-style-type: none"> <li>· manufacturer's instructions indicate otherwise</li> <li>· equipment is obviously damaged</li> </ul>

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<ul style="list-style-type: none"> <li>· Televisions</li> <li>· Videos</li> <li>· Fans</li> <li>· Lamps</li> <li>· Fridges</li> <li>· Franking machine</li> <li>· Cables connected to the equipment</li> </ul>	<ul style="list-style-type: none"> <li>· Equipment is suspected to be damaged when it is not visually obvious (e.g. when a cup of coffee has been spilt into it)</li> </ul> <p>If equipment is moved frequently an annual test would be advisable.</p>	
<ul style="list-style-type: none"> <li>· Kettles</li> <li>· Floor cleaners</li> <li>· Cables connected to the equipment</li> </ul>	<p><b>6 months to one year</b> or when user check indicates necessary</p>	

- 8.3 Records of all above testing and inspection will be kept on file.
- 8.4 The Health and Safety Officer must be notified of any new electrical equipment purchased so that it may be logged and tested before being put into operation.
- 8.5 Equipment failing a Portable Appliance Test will be immediately withdrawn from service and removed from the site until the fault is rectified or the item replaced.
- 8.6 Personal portable electrical items must not be brought onto site unless with specific knowledge of and agreement with the Health and Safety Officer.
- 8.7 Extension leads must be kept to a minimum to avoid fire and trip hazards. Workstation assessments will include an inspection of the cabling.
- 8.8 No employee should attempt to tamper with or repair electrical equipment unless they are employed for that purpose and are suitably qualified to the appropriate standard.

## 9 HAZARDOUS SUBSTANCES

- 9.1 Before any potentially hazardous substance is purchased for use on site the relevant manager/supervisor must ensure a competent person carries out a [“Control of Substances Hazardous to Health”](#) (or [“CoSHH”](#)) assessment. Where the hazard is unacceptable, a less hazardous alternative must be sought.
- 9.2 All relevant information on hazardous substances must be kept in the vicinity of the substances in use. This is to ensure the necessary information is available to give appropriate first aid treatment or treat any spillage or contamination quickly and effectively.
- 9.3 Relevant staff will be trained in the hazards and risks to which they may be exposed. Information from Material Safety Data Sheets and CoSHH Assessments will also be given to them to ensure they understand the hazards to which they may be exposed.

- 9.4 Substances used by contractors will be subject to the same controls. They will be expected to produce a [“Material Safety Data Sheet” \(or “MSDSs”\) containing information on potential health, fire, reactivity and/or environmental hazards](#) and CoSHH assessments for any substance brought onto site, prior to arrival.
- 9.5 Empty or discarded containers must be collected in appropriate storage and disposal carried out through a specialized licensed contractor in accordance with environmental legislation.

## 10 NOISE AT WORK

- 10.1 Many employees in the music industry are subjected to high levels of noise for long periods as part of their work. ~~Some may never have a problem with hearing whereas others may develop problems early in life. If your hearing becomes impaired it cannot be rectified and this will inevitably affect work and social life.~~
- 10.2 The company is required by law to [take steps to](#) protect the hearing of [its](#) employees at work so far as is reasonably practicable.
- 10.3 Where staff have control over the noise level exposure of themselves and others e.g. in classrooms, they will be expected to keep noise levels within safe limits and provide regular breaks for those listening.
- 10.4 On rare occasions, employees may be exposed to high noise levels which can not be controlled (e.g., live music setting). Those who are exposed to such levels of noise are recommended to wear ear protection e.g. earplugs, and these will be provided as requested.
- 10.5 If a member of staff is concerned about their hearing and would like more information, please contact the Health and Safety Officer.

## 11 OCCUPATIONAL HEALTH

- 11.1 Occupational Health is concerned with the effects of working environment on health and with the influence of an employee's state of health on his/her ability to perform the task he/she is employed to do. The objective is to prevent ill health and / or stress rather than to cure it.
- 11.2 Stress can manifest itself through mental or physical illness or through increased use of alcohol or drug abuse. It is important that all employees recognise the signs of stress both in themselves and in others in order that the problem is highlighted. Human Resources Officer will discuss any issues in complete confidence and offer appropriate advice on further help that may be available.
- 11.3 At all stages of recruitment, clear job descriptions will be given to allow prospective applicants to assess their suitability for the role.
- 11.4 Only after selection interviews are over and a candidate selected, will medical aspects of the appointment be considered.

## 12 THE WORKPLACE ENVIRONMENT

12.1 Recommended comfort ranges for working temperatures (Workplace Health, Safety and Welfare Regulations 1992) are as follows:

- Sedentary /office work: 19 - 23°C
- Light work: 16 - 20°C
- Heavy work: 13 - 16°C

Effective equipment will be provided to avoid excessive heat or cold and introduce suitable controls to ensure levels are reasonable. In the event that heating or air conditioning fails, an adequate alternative will be substituted for such time as it is required to moderate temperatures.

12.2 Lighting will be suitable and sufficient for the tasks performed in each area. Recommended lighting levels are as follows:

- Average illuminance: 200 – 400 Lux
- Minimum illuminance: 100 Lux

~~Bulbs replaced as often as necessary to ensure reasonable lighting levels.~~

12.3 Point Blank operates a No Smoking Policy, ~~which was introduced~~ to protect the health of staff and visitors and for reasons of fire safety.

All staff must ensure they, and their visitors/contractors are aware of site rules on smoking at their base and at any sites visited.

12.4 Managers will inspect their areas at least quarterly to ensure hazards are identified. Action is then taken to ensure faults and hazards are rectified at the earliest possible stage. Frequency of inspections is commensurate with the risk.

## 13 GLOBAL ENVIRONMENT

13.1 The company respects the environment and every attempt will be made strictly comply with all applicable environmental laws and regulations and to reduce and minimise through the careful control and monitoring of utilities. A fuller account of the company's commitment can be found in the 'Environmental Sustainability Policy'.

## 14 WORK EQUIPMENT

14.1 Equipment is tested, serviced and thoroughly examined at least every six months.

14.2 Off-site equipment is inspected between each job and instructors are expected to report any problems or faults they experience with equipment. The Logistics Officer has overall responsibility for ensuring the good working condition of equipment, and is the principal point of contact in the event of any breakdown, failure or deficiencies.

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## 15 TRAINING AND COMPETENCE

- 15.1 Managers are responsible for ensuring first day induction is carried out on new staff, temps and work experience students in their department to ensure they receive essential basic information on emergency evacuation, first aid and accident reporting procedures.
- 15.2 Staff named in this policy will receive appropriate training in health and safety according to their level of need. Managers will annually review health and safety training needs with their staff as part of overall training needs during appraisal to identify any special areas of need in Health and Safety training.
- 15.3 Employees must not operate any machinery or equipment if they are not competent to do so, until the appropriate level of training has been achieved and agreed, if an employee is concerned about their ability to operate an item of machinery or equipment, they must request training or re-training at the earliest opportunity.

## 16 LONE WORKING, VIOLENCE AND STRESS AT WORK

- 16.1 On rare occasions employees may experience aggressive or violent behaviour whilst working. Violent behaviour is not limited to physical violence: verbal abuse can be just as disturbing for staff who work directly either face to face with the public or by telephone e.g. call centre and reception staff.
- 16.2 Employees attending off-site meetings must [timely](#) inform at least one other member of staff where they are going.
- 16.3 Stress can manifest itself through mental or physical illness or through increased use of alcohol or drug abuse. It is important that all employees [are aware of and remain vigilant to](#) recognise the signs of stress both in themselves and in others in order that the problem is highlighted.

## 17 DRIVING FOR WORK AND MOBILE TELEPHONES

- 17.1 Cars used for business purposes must be kept in a good state of repair and in good order at all times.
- 17.2 Any accident involving a personal car whilst on business must be reported on an accident form, preferably at the office, and reported verbally to the relevant manager without delay.
- 17.3 Employees are advised to take regular breaks on long journeys to reduce fatigue and aches to the upper limbs - fifteen minutes in every two hours is recommended.
- 17.4 In compliance with the law and safe working guidelines, staff are strictly forbidden to use mobile phones while driving, or to drive when under the influence.

## **18 STATUTORY NOTICES AND DOCUMENTATION**

18.1 A number of statutory and essential information documents / notices are displayed on all notice boards at each site and must not be removed or replaced except by authorized personnel. Statutory notices and documentation include:

- Poster 'Health & Safety Law - What You Should Know' - this gives details of your local Environmental Health Office and UMG personnel with Health and Safety duties at your site.
- Emergency Evacuation Procedures

18.2 Employer's Liability Insurance is made accessible to all employees via the shared network drive.

18.3 The Student Handbook and Staff Handbook include details of members of staff who have specific roles under the Health and Safety Policy, including:

- Names and contact details of First Aiders
- Names and contact details of Fire Wardens

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# POINT BLANK

MUSIC SCHOOL

## Environmental Sustainability Policy

### 1 STATEMENT OF PURPOSE

This policy and the guidelines it contains are intended to allow the company to reach its business objectives with minimal impact on the environment. We strive to:

- Minimise energy consumption
- Eliminate waste and recycle where possible
- Promote sustainable forms of transport
- Choose to work with providers with environmentally responsible practices

### 2 RECOMMENDED PRACTICES

Point Blank promotes to its staff and learners the following environmentally-friendly practices:

- To minimise our use of paper and other office consumables, for example by using both sides of paper and only printing when necessary.
- To use web-based database systems rather than paper-based where possible (for example college student database is now fully online). To forego a print brochure by referring prospective clients to the comprehensive website prospectus at [www.pointblanklondon.com](http://www.pointblanklondon.com).
- To adhere to a paper recycling policy in the office and college of which all members of staff and students are aware.
- To suffix email signatures with the line "Please consider the environment before printing this email".
- To encourage employees to use public transport to travel to/from work and to/from meetings to cut down on carbon emissions.
- To host virtual meetings where excessive travel would be required for a face-to-face meeting (e.g. telephone and video conferencing, webchats etc.)
- To reduce the need for our staff to travel by supporting alternative working arrangements, including working from home.



- To use low energy lighting and make full use of the daylight available through the building's large windows
- To share printers and resources as far as possible within the office and to encourage staff and students to switch off lights and electrical equipment when not in use.
- To use [re-useable](#) mugs and cups instead of paper [or other disposable](#) cups and to drink filtered tap water rather than bottled water.
- To take environmental sustainability into consideration when assessing and comparing suppliers.



**Admissions Policy**

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# Section A: Introduction

## 1 INTRODUCTION

- 1.1 The aim of this document is to outline policies adopted by Point Blank for Admissions.
- 1.2 Point Blank is accredited by Pearson/Edexcel and the admissions policy reflects the determination to enrol learners with integrity on the accredited courses run under the BTEC framework.
- 1.3 This policy is to be used for all admissions enquiries, accredited or otherwise, ensuring a fair and equal admissions procedure for all learners.
- 1.4 The admissions process is the responsibility of the Course Advisors who report to the Managing Director. These two roles form the Admissions Team. Admissions staff will be appropriately trained in Edexcel regulations.
- 1.5 Point Blank also recognises the benefits, to the School and to the wider community, of recruiting a diverse population of students and aims, in so doing, to ensure a wide participation.

## 2 COMMUNICATION OF THE POLICY

- 2.1 The Admissions Team are made fully aware of the contents of this statement/policy and its purpose at the 'pre-course' stage of all Point Blank programmes. The policy will be published on the Point Blank website two months ahead of an academic year.

## 3 REVIEW OF THE POLICY

- 3.1 The Company reviews the policy annually and may revise it as and when necessary in response to customer feedback, changes in Pearson/Edexcel practices or changes in legislation. Our review of the policy will ensure that our procedures continue to be consistent with the regulatory criteria and are applied properly and fairly in arriving at judgments.

Approval Given By: **Jules Brookes**

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# Section B: Policy Statement

## 1 OUR STATEMENT TO LEARNERS

- 1.1 As a Pearson/Edexcel approved centre we ensure that the accredited qualification will suit your academic needs and be at an appropriate level for you, based on our published entry requirements.
- 1.2 All course admission enquires, accredited or otherwise, will be treated in accordance with the admissions policy.
- 1.3 Our admissions team will help guide you through our range of courses, helping you choose an appropriate course for you.

## 2 POLICY AND IMPLEMENTATION

- 2.1 Point Blank makes every effort to ensure that all learners are enrolled on an appropriate course in terms of academic level, course length, course cost and course intensity.
- 2.2 The admissions team conduct initial informal interviews with potential students to check their level of experience and qualifications ahead of advising on suitable courses.
- 2.3 The admissions team will provide information on~~clearly explain~~ course costs and funding options available to students.
- 2.4 Point Blank will publish entry requirements ~~clearly~~ on their website alongside each accredited qualification.
- 2.5 Where applicable, Point Blank will take into account 'Recognition of Prior Learning' when assessing a student's suitability for a course.
- 2.6 Edexcel BTEC 'top-up' registrations will be used where applicable to allow students to progress onto larger BTEC programmes during the course of their studies at Point Blank.
- 2.7 Where appropriate, ~~the~~ learner induction period ~~and first month~~ of the relevant course will be used to ascertain whether a student is on the correct course at an appropriate academic level.
- 2.8 Where applicable, students deemed to be on an inappropriate course will be offered a transfer to a course that suits their needs.
- 2.9 Codes of admission practice will ensure that selection procedures are structured to operate efficiently and promptly having regard for the situation of each candidate. Formal interviews will normally only be offered to candidates for whom it is considered an interview is desirable.

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- 2.10 Decisions on admissions of candidates with no qualifications will be based on recognition of prior learning and relevant experience.
- 2.11 If students with prior level 3 qualifications in the same, or similar, subject apply and request RPL for some learning outcomes then the Programme Leader and Head of Education will decide on the validity of the evidence
- 2.12 If a student has a prior BTEC qualification at a smaller size then the Programme Leader will use these previously achieved units towards the new, larger, BTEC qualification
- 2.13 The admission of international students will be undertaken in accordance with published national codes of practice and Home Office regulations.

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Date of Next Review: **31<sup>st</sup> Aug 2016**



# POINT BLANK

MUSIC SCHOOL

## Equal Opportunities

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# Section A: Introduction

## 1 PURPOSE OF THE POLICY

- 1.1 The purpose is to set out our commitment to ensuring equality of opportunity in our responsibilities as a limited company and an approved training provider. We fully support the principle of equal opportunities and oppose all unlawful or unfair discrimination on the grounds of ability, age, colour, culture, disability, domestic circumstances, employment status, gender, marital status, nationality, political orientation, racial origin, religious beliefs, sexual orientation and social background. The Company's policies on maternity, paternity, parental and adoption leave are set out at Sections D – G of this handbook.

## 2 COMMUNICATION OF THE POLICY

- 2.1 All the Companies personnel involved in the management, assessment and quality assurance of programmes, candidates studying programmes and all other employees are made fully aware of the contents of the policy and its purpose.

## 3 REVIEW OF THE POLICY

- 3.1 The Company reviews the policy annually and may revise it as and when necessary in response to customer feedback, changes in Pearson/Edexcel practices, actions from the regulatory authorities or external agencies or changes in legislation. Our review of the policy will ensure that our procedures continue to be consistent with the regulatory criteria and are applied properly and fairly in arriving at judgements.

# Section B: Policy Statement

## 1 OUR AIMS

1.1 We aim to ensure that equality of opportunity is promoted in access to our products and services and that unlawful or unfair discrimination, whether direct or indirect, is eliminated.

1.2 As a training provider, we seek to ensure that:

- This policy is made freely available to our External Contractors and our customers, including candidates.
- The widest possible diversity of candidates can access the content and assessment of our products and services.
- The entry requirements, content and assessment demands of our products and services are appropriate to the knowledge, understanding and skills specified and do not act as unnecessary barriers to achievement.
- All our products and services will ensure fair assessment for all candidates.
- The language we use in our materials is clear, free from bias and appropriate to the target group.
- We aim to produce and endorse material that does not cause offence.
- ~~All our products and services are reviewed against this policy.~~
- We'll act fairly at all times when working with other centres and candidates.

1.3 As an approved centre, we seek to ensure that:

- All our processes concerned with assessment are carried out in a fair and objective manner.
- We continue to adhere to current equal opportunities legislation.
- We continue to operate an effective equal opportunities policy, with which candidates are familiar and which applies to all candidates using our products and services.
- We continue to operate an effective appeals procedure, with which candidates are familiar and which applies to all candidates using our products and services.

1.4 As an employer, we seek to ensure that:

- There should be no discrimination on account of race, colour, religion or belief, ethnic origin, sexual orientation, gender, gender reassignment, disability, age, nationality or marital or part-time status.
- The Company ~~will~~ appoints, trains, develops, rewards and promotes its staff on the basis of merit and ability.
- All employees are aware of their~~have~~ personal responsibility for the practical application of the Company's equal opportunities policy, which extends to the treatment of job applicants, employees, customers and visitors.
- Special responsibility for the practicable application of the Company's equal opportunities policy falls upon managers, and supervisors involved in the recruitment, selection, promotion and training of employees.

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- The Company's grievance procedure is available to any employee who believes that he or she may have been unfairly discriminated against. The harassment complaints procedure set out in this policy is available to any employee who believes that he or she may have been harassed. Employees will not be victimised in anyway for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.
- Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment will be treated as gross misconduct. Allegations of discrimination which are not made in good faith will also be considered as a disciplinary matter. Confidential records of ongoing matters dealt with in accordance with this policy will be kept.
- In the case of any doubt or concern about the application of this policy in any particular instance, please consult one of the directors.

## **2 EQUAL OPPORTUNITIES CODE OF PRACTICE**

- 2.1 The Company has introduced this equal opportunities policy. The Company regards this as a commitment to make full use of the talents and resource of all its employees and to provide a healthy environment which will encourage good and productive working operations within the organisation. This code of practice describes how the policy is to be applied throughout the Company.
- 2.2 The Company is particularly concerned that equality of opportunity is maintained in the following areas:
- recruitment and selection;
  - promotion, transfer and training;
  - terms of employment, benefits, facilities and services;
  - grievances and disciplinary procedures;
  - dismissals and redundancies.
- 2.3 An equal opportunities policy statement will be displayed on the Company notice board and will be contained within the staff handbook.
- 2.4 The Company will ensure that all managers and supervisors with the responsibility for any of the areas of particular concern listed under 'Objectives' above are provided with the appropriate equal opportunities training where necessary.
- 2.5 The directors will regularly monitor the effectiveness of this policy to ensure that it is working in practice and review and update this policy as and when necessary.

## **3 RECRUITMENT AND SELECTION**

- 3.1 The following principles should apply whenever recruitment or selection for positions takes place:

- individuals will be assessed according to their personal capability to carry out a given job;
- assumptions that only certain types of person will be able to perform certain types of work must not be made;
- any qualifications or requirements applied to a job which have or may have the effect of inhibiting applications from certain types of person should only be retained if they can be justified in terms of the job to be done;
- recruitment solely or primarily by word of mouth should be avoided if its effect is or may be to prevent certain types of person from applying;
- selection tests should be specifically related to job requirements and should measure the person's actual or inherent ability to do or train for the work;
- selection tests should be reviewed regularly to ensure they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism;
- applications from different types of person should be processed in the same way;
- written records of interviews and reasons for appointment and non appointment should be kept;
- questions should relate to the requirements of the job; if it is necessary to assess whether personal circumstances may affect job performance, this should be done objectively without questions or assumptions being made which are based on stereotyped beliefs about certain types of person;
- where the Company's arrangements for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or if that is not reasonably practicable, reduce the disadvantage unless objectively justified;
- no decisions regarding recruitment or selection should be made by a person who has not read and understood this policy.

## 4 PROMOTION, TRANSFER AND TRAINING

4.1 The following principles should apply to appointments for promotion, transfer and training:

- assessment criteria and appraisal schemes should be carefully examined to ensure that they are not unlawfully discriminatory;
- assessment criteria and appraisal schemes should be monitored and, where such criteria or schemes result in predominantly one group of workers gaining access to promotion, transfer or training, they will be checked to make sure this is not due to any hidden or indirect discrimination;
- promotion and career development patterns will be monitored to ensure that access to promotion and career development opportunities in particular groups of workers are not unjustifiably being excluded;
- traditional qualifications and requirements for promotion, transfer and training, such as length of service, and age, which may discriminate against certain groups of workers shall be reviewed and will only continue to be applied if genuinely justified;
- policies and practices regarding selection for training, day release and personal development should not result in an imbalance in training between groups of workers unless this is objectively justified;

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- where the Company's arrangements in relation to promotion, transfer or training put disabled workers at a substantial disadvantage for a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless objectively justified.

## **5 TERMS OF EMPLOYMENT, BENEFITS, FACILITIES AND SERVICES**

5.1 The following principles shall apply to terms of employment, benefits, facilities and services:

- the terms of employment, benefits, facilities and services available to workers should be reviewed regularly to ensure that they are provided in a way which is free from unlawful discrimination;
- part-time workers should receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified;
- where the Company's arrangements relating to terms of employment, benefits, facilities and services put disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless otherwise objectively justified;
- pay and bonus criteria, policies and arrangements should be carefully examined and monitored, and if it appears that any group of workers are disadvantaged by them they will be checked to make sure that this is not due to any hidden or indirect discrimination.

## **6 GRIEVANCES, DISCIPLINARY PROCEDURES, DISMISSALS AND REDUNDANCIES**

6.1 Workers who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an equal opportunities matter will not be disciplined, dismissed or otherwise victimised for having done so.

6.2 Any group of workers will not be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group unless there is genuine and lawful justification for this.

6.3 Redundancy criteria and procedures will be carefully examined to ensure that they do not operate in an unlawfully discriminatory manner.

6.4 The provision of voluntary redundancy benefits will be equally available to all workers concerned unless there is a genuine and lawful justification for doing so otherwise.

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# POINT BLANK

MUSIC SCHOOL

## Safeguarding Children

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# 1 INTRODUCTION

A child is defined as a person under the age of 18 (The Children Act 1989). For the purpose of this policy document:

- The term 'child' will be used to describe all children and young people under the age of 18 years old participating in Point Blank led activities.
- The term 'staff' will be used to describe those employed on a contract of employment at Point Blank including those on working on a voluntary/unpaid basis.

# 2 PURPOSE OF THIS POLICY

This policy is intended for all employees of Point Blank Limited and anyone else who is affected by its work activities. The aim of this Child Protection Policy is to promote good practice to:

- Provide children and young people with appropriate safety and protection whilst visiting/ in the care of Point Blank;
- Allow all staff /volunteers to make informed and confident responses to specific child protection issues.

Point Blank is determined to ensure that all necessary steps are taken to protect from harm those children and young people who participate in its provision.

This policy establishes Point Blank's position, role and responsibilities and clarifies what is expected from everybody involved within the company.

Every child and young person who participates in Point Blank activities should be able to participate in an enjoyable and safe environment and be protected from abuse. This is the responsibility of every adult involved in this organisation.

Point Blank recognises its responsibility to safeguard the welfare of all children and young people by protecting them from physical, sexual or emotional abuse, neglect and bullying.

~~Point Blank will ensure that:-~~

- ~~▪ The welfare of the child is paramount~~
- ~~▪ All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse~~
- ~~▪ All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately~~
- ~~▪ All staff (paid/unpaid) working in this organisation have a responsibility to report concerns to Jules Brookes (Managing Director).~~

# 3 POLICY STATEMENT

~~Point Blank staff have a professional duty to take reasonable steps to see that the child is safe from harm while involved in Point Blank activities. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account.~~

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~~Point Blank will ensure the safety and protection of all children involved in its activities through adherence to the Child Protection guidelines it has adopted.~~

~~This policy will be reviewed and revised every year.~~

## ~~43~~ **EMPLOYER'S RESPONSIBILITIES**

In our provision for children Point Blank will take steps to ensure that:

- The welfare of the child is paramount
- All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- All staff have a responsibility to report concerns to the appropriate child protection lead member of staff.

## ~~54~~ **EMPLOYEES' RESPONSIBILITIES**

Point Blank Child Protection Policy will be implemented by adhering to the policy guidelines contained within this document. All staff who work with children must comply with this Policy in conjunction with Point Blank Code of Ethics and Conduct, failing which disciplinary action may be taken under the Point Blank Disciplinary Procedure. Adherence of staff to this Policy will be monitored by line managers and ultimately by the person named above as being responsible for this policy.

The guidelines cover three main areas:

- Staff recruitment, support and training
- Staff conduct
- Child protection procedures

## ~~6~~ **CHILDREN'S RIGHTS**

~~All children have needs and rights:~~

- ~~The need for physical care and attention~~
- ~~The need for intellectual stimulation~~
- ~~The need for emotional love and security~~
- ~~The need for social contact and relationships~~
- ~~The right to have their needs met and safeguarded~~
- ~~The right to be protected from neglect, abuse and exploitation~~
- ~~The right to be protected from discrimination~~
- ~~The right to be treated as an individual~~

~~All these rights will be made transparent to the children before any learning is under taken.~~

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## **75 ROLES**

For all activities and events involving children at Point Blank, at least one member of staff should lead on child protection, raising awareness of this policy and its guidelines among other staff and where appropriate the children, accompanying school/care staff and parents.

Where staff are likely to engage with a child on a one-to-one basis, it is imperative that he/she is appropriately child protection trained. The "Lead member of staff" referred to in this Policy is the Head of College, or, in his/her absence, the Project Manager.

## **86 STAFF RECRUITMENT, SUPPORT AND TRAINING**

Point Blank recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children.

Pre-selection checks must include the following:

- All volunteers/staff should complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- Consent should be obtained from an applicant to seek information from the Criminal Records Bureau.
- Two confidential references, including one regarding previous work with children. These references must be taken up and confirmed through telephone contact.
- Evidence of identity should be provided (e.g., passport or driving licence with photo).

## **97 INTERVIEW AND INDUCTION**

All employees (and volunteers) will be required to undergo an interview carried out to acceptable protocol and recommendations. All employees and volunteers should receive formal or informal induction, during which:

- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- Their qualifications should be substantiated.
- The job requirements and responsibilities should be clarified.
- They should sign up Point Blank Code of Ethics and Conduct.
- Child protection procedures are explained and training needs are identified.

## **108 TRAINING**

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child or young person.

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- Work safely and effectively with children.

## 419 **STAFF CONDUCT**

All staff should demonstrate exemplary behaviour in order to protect themselves from allegations of misconduct. Staff should maintain their standards of behaviour therefore acting as a role model.

The following are common sense examples of how to create a positive culture and climate.

### 11.1 Good practice means:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never allow yourself to be left alone with a participant. There may be rare occasions when a confidential interview or a one-to-one meeting is necessary and in such circumstances, the interview should be conducted in a room with an open door or visual access. Where this is not possible, the member of staff should ensure that there is another adult nearby. Never make gratuitous physical contact with a participant. [There may be occasions where a distressed participant needs comfort which may include physical comforting and staff should use their discretion to ensure that it is appropriate and not unnecessary or unjustified contact.] Be cautious about physical contact in games. Where physical contact is inescapable (e.g. to demonstrate equipment or a particular exercise/move) staff should be aware of the limits within which such contact should take place and of the possibility for misinterpretation of such contact.
- Treat all children equally, and with respect and dignity. Point Blank will take positive action to eliminate discrimination against any person or group of people.
- Staff should ensure that children are protected from discrimination on any grounds, including ability and challenge discriminating comments and behaviour. Activities should be designed to include all children and to promote positive attitudes towards differences.
- Be clear about what the objectives of the activity are before it begins and always put the welfare of each child first, before winning or achieving goals.
- Never contradict an instruction given by an instructor/ project manager or other member of staff
- Maintaining a safe and appropriate distance with children (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child or to share a room with them during residential activities).
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Ensuring that if children of mixed genders are to be supervised, they should always be accompanied by a male and female member of staff. However, remember that same gender abuse can also occur.
- Ensuring that at residential events, adults should not enter children's rooms (unless it is essential because a child is ill and in these circumstances, adopt the procedures set out above in relation to private interviews). Staff should never invite children into their rooms.
- Conducting yourself in a manner that sets a good example to the participants. Be an excellent role model – this includes not smoking or drinking alcohol in the company of/whilst responsible for children.
- Always give enthusiastic and constructive feedback rather than negative criticism.

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- Never use physical force against a participant, unless it constitutes reasonable restraint to protect him/her or another person or to protect property. If it is necessary to restrain a participant because they are an immediate danger to themselves or others or to property then the minimum amount of force should be used for the shortest amount of time. Remain calm and get the attention and support of other staff. The incident should be recorded in writing, with a witness statement (where possible), immediately afterwards.
- Never using physical punishment
- Securing parental consent in writing if the need arises to administer emergency first aid and/or other medical treatment where the participant is under 16. First aid given should be recorded in writing and reported to the lead member of staff who will inform the parent or carer (refer to Health & Safety policy).
- Always keep a written record of any injury that occurs, along with the details of any treatment given (refer to Health & Safety policy)..
- Request written parental consent if staff are required to transport young people in their cars.
- Always refer any problems to the child protection lead member of staff.
- Question any unknown adult who enters Point Blank's premises and/or who attempt to engage with the children.

### 11.2 Practices never to be sanctioned:

- Engaging in rough, physical or sexually provocative games, including horseplay.
- Sharing a room with a child.
- Engaging in any form of inappropriate touching.
- Children's inappropriate use of language and/or behaviour. This should always be challenged.<sup>1</sup>
- Sexually suggestive comments to a child, even in fun.
- Reducing a child to tears as a form of control.
- Allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or disabled adults that they can do for themselves (e.g. apply sunscreen).<sup>2</sup>
- Invite or allow children to stay with you at your home or arrange meetings outside of Point Blank
- Incidents that must be reported/recorded

If any of the following occur you should report this immediately to another colleague and record the incident. You should also ensure the parents of the child are informed:

---

<sup>1</sup> Challenging Behaviour: 'Bad' behaviour is often a response to a situation, or a way to seek attention. If children are occupied there will be less of a need to seek attention and less of a chance for boredom to set in.

The following guidelines can be used to deal with challenging behaviour constructively:

- • Be aware of what unacceptable behaviour is. Ask your lead member of staff if you are unsure. Children attending certain activities will have been issued with a code of conduct.
- • Explain to children why certain behaviour is unacceptable. This makes children feel responsible for their behaviour and they are less likely to repeat it.
- • Make sure it is the behaviour which is punished and not the person. Always avoid labelling someone as 'bad'.
- • If appropriate ignore the bad behaviour for a while – a child may only be attention seeking.

<sup>2</sup> It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

- if you accidentally hurt a learner
- If he/she seems distressed in any manner
- if a learner appears to be sexually aroused by your actions
- if a learner misunderstands or misinterprets something you have done.

### 11.3 Whistleblowing Policy

Purpose and scope:

- All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Company believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation the Company believes it can help prevent malpractice—prevention is better than cure. That is the aim of this policy.
- By encouraging a culture of openness the Company wants to encourage you to raise issues which concern you at work. You may be worried that by reporting such issues you will be opening yourself up to victimisation or detriment, or risking your job security; that is quite understandable. However, all staff now enjoy statutory protection if they raise concerns in the right way. This policy is designed to give you that opportunity and protection. Provided you are acting in good faith, it does not matter if you are mistaken. There is no question of you having to prove anything.
- If there is anything which you think the Company should know about please use the procedure outlined in this policy. By knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please, do not hesitate to “blow the whistle” on malpractice.

Note: This policy is not the normal Grievance Procedure. If you have a complaint about your own personal circumstances then you should use the normal Grievance Procedure. If you have concerns about malpractice within the organisation then you should use the procedure outlined in this policy.

### 11.4 Our Guarantee

- The Company is committed to this policy. If you use this policy to raise a concern the Company gives you its assurance that you will not suffer any form of retribution, victimisation or detriment. The Company will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter to be treated in confidence the Company will respect your request and only make disclosures with your consent. You will be given feedback on any investigation and the Company will be sensitive to any concerns you may have as a result of any steps taken under this procedure.

### 11.5 How to raise your concern internally

- Tell your immediate superior line manager

If you are concerned about any form of malpractice you should normally first raise the issue with your immediate superior line manager. There is no special procedure for doing this—you can tell that person about the problem or put it in writing if you prefer.

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- If you feel unable to tell your immediate superior line manager

If you feel you cannot tell your immediate superior line manager, for whatever reason, please raise the issue with another manager.

- If you still have concerns

If you have raised your concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with a Director.

#### 11.6 How the Company will respond

- After you have raised your concern the Company will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.
- As far as possible, the Company will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

#### 11.7 Raising your concern externally (exceptional cases)

The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take. However, if for whatever reason, you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate regulator.

**Caution: If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistleblowers who make wider disclosures of this type will only be protected (from victimisation and suffering detriment) in certain circumstances. The Company recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.**

#### 11.8 Use of photographic/filming equipment

Written consent to take and use images of children should be obtained prior to the taking of photographs and/or video footage. Parents should be made aware of when, where and how the images may be used in order to give their informed consent. This includes comprehensive information regarding use of images e.g. in print, multi-media, broadcast; for what purpose e.g. promotion, publicity, evaluation, audit, review; and where possible an indication of who the audience will be e.g. the general public, the participating children and their families, other organisations and institutes.

## 12 CHILD PROTECTION PROCEDURES

Point Blank will follow the procedures set out by the Area Child Protection Committee (London) to:

- Ensure we have a lead member of staff for child protection who has received appropriate training and support for this role.
- Ensure every member of staff knows the name of the lead staff member responsible for child protection and their role.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the lead staff member. However, staff should remember that they are not trained to deal with situations of abuse or to decide if abuse has occurred.
- Ensure that parents have an understanding of the responsibility placed on Point Blank and staff for child protection by supporting documentation available from Point Blank.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately. Ensure all records are kept securely in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Adopt a procedure for dealing with concerns about possible abuse.

## 13 CHILD ABUSE

### 13.1 Definition of Child Abuse

*A term to describe a range of ways in which people, usually adults, harm children. Often the adult is a person who is known and trusted by the child.*

*Child abuse is neglect, physical injury, sexual abuse or emotional abuse inflicted or knowingly not prevented, which causes significant harm or death.*

NSPCC (1999)

### 13.2 Awareness of actual or likely occurrence of abuse

There are a number of ways in which abuse becomes apparent:

- A child discloses abuse.
- Someone else discloses that a child has told him/her or that he/she strongly believes a child has been or is being abused.
- A child may show signs of physical injury for which there appears to be no satisfactory explanation.
- A child's behaviour may indicate that it is likely that he/she is being abused.
- A member of staff's behaviour or in the way in which he/she relates to a child causes concern.

### 13.3 Issues of Disclosure

Becoming aware of abuse can cause a multitude of emotional reactions, which are personal to each individual. Whatever the reaction and however the abuse has become apparent, actual or suspected, it must be responded to in the correct manner according to the procedure outlined here. Even if the truth of the disclosure is uncertain – an appropriate response has to be made. A response in accordance with the procedure outlined here will be supported by the lead member of staff and ultimately Point Blank.

### 13.4 What to do upon suspicion or disclosure

There are some basic principles in reacting to suspicions, allegations, and/or disclosures.

<b>What to do</b>	<b>What not to do</b>
Stay Calm	Don't panic. Don't over-react. It is extremely unlikely that the participant is in immediate danger
Listen, hear and believe	Don't probe for more information.
Give time to the person to say what they want	Questioning the participant may affect how the participant's disclosure is received at a later date.
Reassure & explain that they have done the right thing in telling.	Don't make assumptions, don't paraphrase and don't offer alternative explanations.
Explain that only professionals who need to know will be informed	Don't promise confidentiality to keep secrets or that everything will be OK (it might not)
Act immediately in accordance with the procedure in this policy	Don't try to deal with it yourself
Record in writing as near as verbatim as possible what was said as soon as possible	Don't make negative comments about the alleged abuser
Report to the lead member of staff	Don't "gossip" with colleagues about what has been said to you
Record your report	Don't make a child repeat a story unnecessarily

It is the duty of anyone who works with children to report disclosure of abuse. It is not for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with according to this procedure.

### 13.5 Responsibility

Staff made aware of suspicions, allegations or actual abuse, are responsible to take the appropriate action according to this procedure.

- The primary responsibility of the person who first suspects or who is told of abuse is to report it and to ensure that their concern is taken seriously whilst adhering to the dos and don'ts above.
- The incident should be reported immediately to the lead member of staff who is then responsible for dealing with allegations or suspicions of abuse.
- Staff should never try to deal with a suspicion, allegation or actual incident of abuse by him/herself.

### 13.6 Reporting suspected, alleged, or actual incidents of abuse

It may sometimes be difficult to accept that something that has been disclosed in confidence by a child or anyone else should be passed on to a colleague. But the welfare of a child must be paramount and you therefore have a duty to report suspicions, allegations or actual incidents to the designated member of staff.

Information should also be reported if you yourself have concerns that a child may be suffering harm or at risk of abuse, even if you are unsure about your suspicions. Once this initial report has been made, the lead member of staff will consult with the relevant statutory agencies:

- The local Social Services Emergency Duty Team
- Child Protection Unit
- NSPCC Child Protection Helpline 0800 800 500

The following information may be required:

- Staff name, address, telephone number, position/role within Point Blank.
- As many details about the child as possible, e.g. name, date of birth, address, home telephone number, and school.
- What the reasons are for telephoning, e.g. the suspicions, allegations, what has been said, giving details of times and dates and the child's emotional state, or what the child has said in response to the suspicions/concerns. Make a clear distinction between what is fact, opinion or hearsay.
- What's been done so far?
- Where possible referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

The relevant statutory agency will then give instructions as to what to do next and take the responsibility for further action.

### 13.7 Statutory Child Protection Procedures

What happens next is entirely up to the relevant statutory agency, usually Social Services. Enough information passed onto the agency may lead to the suspicion, allegation or actual incident, being dealt with quickly with few complications, or it may lead to thorough checks with several other organisations and possibly a child protection conference.

A child protection conference involves as many people as possible, (including the parents/carers and sometimes the child as well), who discuss the issues that have been raised in the suspicions, allegations, or actual abuse that has been reported and investigated.

Decisions about what will happen next are made at the conference.

Quite often, the person who has made the initial report may not be contacted again unless further information is required and it is not usual practice for the relevant statutory agency to feedback developments. However, if you feel that not enough action has been taken, and the child is still at risk, concerns should be reported again or the NSPCC Child Protection Helpline contacted for advice.

### 13.8 Recording suspected or actual incidents

No matter what happens to a suspicion, allegation or actual incident of abuse, (that is whether or not it is processed through a statutory agency or not), all details must be recorded.

Important information to record includes:

- The date and time of disclosure, suspicion, allegation or actual abuse incident.
- Details given to you about the above, e.g. date & time of when things occurred.
- An indication of the parties involved.
- Details of what action you and the college have taken.
- Details of reporting on, e.g. who to (statutory agency) and when.

If for any reason it is decided not to consult with a relevant statutory agency, a full explanation of why must be documented. Recording should be factual, that is, no reference made to your own subjective opinions. Records should be kept completely confidential and secure (always locked away) and only shared with those who need to know about the suspicion, allegation or actual incident of abuse.