

SAFEGUARDING CHILDREN POLICY

The Bandwagon Ltd.

1. Introduction

a. The Bandwagon Ltd. is a for-profit organisation run by:

Mr Adam Lawrence

b. The Bandwagon Ltd. is based at:

10 Oak Meadow
Shipdham
IP25 7FD

c. The Bandwagon Ltd. is managed by a management team (the Team). One of the management team has particular responsibility for safeguarding children.

d. The Team has adopted this safeguarding children policy and expects every adult working or helping at The Bandwagon Ltd. to support it and comply with it. Consequently this policy shall apply to all staff, managers, trustees, directors, volunteers, students, contractors or anyone working on behalf of The Bandwagon Ltd.

2 Purpose of the Policy

a. This policy is intended to protect children and young people who receive any service from us, including those who are the children of adults who may receive services from us.

b. As an organisation we believe that no child or young person should experience abuse or harm and are committed to the protection of children and young people. This policy is intended to provide guidance and overarching principles to those who represent us as volunteers or staff, to guide our approach to child protection and safeguarding.

3 The risks to children

a. Nearly every child grows up in a safe and happy environment and it is important not to exaggerate or overestimate the dangers. Nevertheless, there are situations where children need protection including:

- Sexual abuse
- Grooming

- Physical and emotional abuse and neglect
- Domestic violence
- Inappropriate supervision by staff or volunteers
- Bullying, cyber bullying, acts of violence and aggression within our schools and campuses
- Victimisation
- Self-harm
- Unsafe environments and activities
- Crime
- Exploitation

4 Universality of Protection

a. We recognise that:

- The welfare of the child is paramount
- All children regardless of race, gender, religious belief, disability, age, sexual orientation or identity have a right to equal protection from harm.
- Some children are more vulnerable to harm as a result of their circumstances, prior experiences, communication needs or level of dependency.
- Working with children, young people, their parents and/or guardians, carers or other agencies is essential to protecting their wellbeing.

5 Safeguarding children at events / activities

- a. Both event and activities are to be defined broadly to include any occasions where The Bandwagon Ltd. will be providing a service.
- b. All Bandwagon activities take place at a school establishment. The Bandwagon Team will refer to the Safeguarding/Child Protection Policies at the school establishment where work is taking place, and ensure any particular procedures defined by the school are in place before any activities take place.**
- c. Additional safeguarding practices are in place specific to The Bandwagon and its Team. **Refer to Appendix A for full details of these practices.**

6 Disclosure and barring

a. The Bandwagon Ltd. offers the following activities for children:

- Group music lessons in a custom built mobile music studio
- Periodic concerts/workshops/showcases of completed work

- b. Some of our activities may therefore require adult participants or adult leaders to undergo DBS and/or police checks under the Safeguarding Vulnerable Groups Act 2006. The required level of checking will broadly reflect the degree and frequency of unsupervised access given to other people's children (**see Appendix A**)
- c. The Team will take very seriously any allegation of impropriety on the part of any member of The Bandwagon Ltd. A member of The Bandwagon Ltd. who discovers anything amiss should get in touch immediately with the following:
 - In the first instance - The appointed safeguarding person/s at the school establishment in question.
 - In the second instance - Mr Adam Lawrence – Managing Director
 - In the third instance (and for general reporting) - Miss Catherine Stafford – Safeguarding Officer – 07828625833
 - **In all instances**, (as long as the safety of the child is maintained), safeguarding professionals and appointed persons must work together and share information to ensure safe outcomes for the child.
- d. The Team (and any other involved professionals) will review the allegation and the likely risk to children and, if appropriate, will consider banning the member from future events or revoking his or her membership or both, but only in full accordance with the rules and procedures of The Bandwagon Ltd.

7 Health and safety aspects of safeguarding children

- a. Before starting any event for unaccompanied children, the Team will carry out a risk assessment and then take steps to minimise all risks to health and safety. Parents and children will be made aware of any particular risks and of the steps to be taken to minimise those risks. The Team will keep a record of all risk assessments.
- b. Sufficient adults must be present at any event for unaccompanied children to enable one adult to deal with any emergency while another adult supervises the children not directly affected by the emergency.
- c. In all relevant circumstances the rules attached in Appendix A will be applied.

9 Policy on the prevention of bullying

- a. We will not tolerate the bullying of children either by adults or by other children. If any incident of child-on-child bullying should arise at Bandwagon Ltd. event or activity, those involved will be separated immediately and the parents of the children

involved will be contacted and asked to deal with the matter. The Team will review all incidents of child-on-child bullying and assess the likely future risk to children.

- b. If appropriate, the Team will consider banning a child from future events, but only in full accordance with the rules and procedures of The Bandwagon Ltd. Allegations of adults bullying children will be dealt with under Section 6c. above.

10 Photographing children

- a. People must expect to have their photograph taken at many of our events and we reserve the right to publish suitable photographs of those attending within the school systems where that child is based, however names will not be used to personally identify any children.
- b. All attempts will be made to prevent individuals from being identified in photographs that are used for Marketing or Advertising purposes, however individual permission will be sought from parents/guardians if The Bandwagon Ltd. wishes to use photos that can identify a child.

11 Managing behaviour, discipline and acceptable restraint

- a. Adults supervising children at The Bandwagon Ltd. events must never use any form of corporal punishment. If physical restraint is absolutely necessary to prevent injury to any person or to prevent serious damage to property, then the minimum necessary restraint may be used — but for that purpose only.
- b. Unacceptable behaviour at The Bandwagon Ltd. events for unaccompanied children will generally be stopped by separating the children from each other and from the group. The separated child/ren will be suitably supervised and will be returned as soon as possible to the care of their parents.
- c. The Bandwagon Ltd. may apply a further disciplinary sanction; namely the banning of the child from one or more future events. Any such sanction would be determined and applied by the following officer:

Mr Adam Lawrence

- d. A parent who is aggrieved by this ban may appeal to The Bandwagon Ltd. who will hear the views of all relevant persons. The decision of The Bandwagon Ltd. is then final. Any such appeals should be made to, and will be determined by the following officer:

Mr Adam Lawrence

- e. If parents fail to provide us with important accurate SEND information, or if a plan is in place and this is not made clear upon enrolment. The Bandwagon cannot be held responsible for any disciplinary, or behavioural issues occurring between students if this information has been withheld.
- f. The Bandwagon Ltd reserves the right to refuse admission of any students who's SEND requirements may be deemed outside the scope of our ability to provide appropriate support or access.
- g. Sections 11e and 11g also form part of our rules and guidelines found in Appendix A

12 Other Policies

- a. This safeguarding policy should be read together with the following policies and resources (**see Appendix B**):
 - The Bandwagon Ltd. Privacy Policy
 - The Bandwagon Ltd. CCTV Policy (as part of the Privacy Policy)

13 Legal Framework

- a. This policy has been drawn up in accordance with the following:
 - Children Act 1989
 - United Convention of the Rights of the Child 1991
 - General Data Protection Regulation
 - Human Rights Act 1998
 - Sexual Offences Act 2003
 - Children Act 2004
 - Safeguarding Vulnerable Groups Act 2006
 - Protection of Freedoms Act 2012
 - Children and Families Act 2014
 - Special educational needs and disability (SEND) code of practice - Guidance on the special educational needs and disability (SEND) system for children and young people aged 0 to 25, from 1 September 2014
 - Information sharing: advice for practitioners providing safeguarding services
 - Working together to safeguard children (2017)

NOTE: This Policy was approved by the following officer on 08/04/2019 and is due for review every 2 years: Mr Adam Lawrence

Appendix A

Further rules and guidelines to be applied for the safeguarding of children

1. Safeguarding and Child Protection Training & Certification

- a. All teachers for the Bandwagon to hold current CP Training, which is to be updated at the start of every school year (September)
- b. Safeguarding Officers for the Bandwagon to keep their safeguarding training up to date, at least every 2 years.
- c. Individual copies of CP Certification to be kept on board the Bandwagon mobile units, and a copy to be provided to the school Safeguarding Team before commencement of Bandwagon lessons

2. Disclosure and Barring Service

- a. All Bandwagon Ltd. teachers to hold an enhanced DBS – issued via NORCA.
- b. DBS is recommended to be updated every 3 years
- c. All volunteers, office staff and contractors who will have contact time with children must hold at least a Basic DBS.
- d. Only members of the Team with an enhanced DBS will be permitted to be 1-2-1 with children at any time, however this is to be avoided where possible in accordance to the following section (3. 1-2-1/Lone Working)

3. 1-2-1/Lone Working

- a. 1-2-1 lessons are avoided where possible. In the instance that a child has a 1-2-1 lesson on the Bandwagon (e.g. if their other classmates are absent) then the following safeguards are in place:
 - CCTV recording at all times (See Appendix B - CCTV Policy – as part of Privacy Policy)
 - Bandwagon doors are to remain open so that there is a clear view inside. In the event that this is not possible due to inclement weather – then lessons

will be doubled up so that there is more than one student at a time or another existing Bandwagon student will be invited in to the session.

4. Teaching Practices

- a. At all times, Bandwagon teachers, and any other member of the Team must observe the following practices when working with children and ensure any instructions intended for children are understood by the students before sessions commence:
 - Personal space to be observed, demonstrations on musical instruments are done from the side not from behind.
 - Bandwagon mobile teaching units are small spaces - children are asked to keep the central gangway clear so that a teacher can move through without having to come into contact with the children at any time.
 - Students are made aware that there is CCTV on all the time, and that it is there for their safety.
 - Copies of the school's safeguarding policies and contacts are available for students in the van.

5. Practices for children with Special Educational Needs and Disability

- a. Parents are asked to submit SEND details during the enrolment process so that Bandwagon staff are aware of any additional needs. Teachers will always adhere to these guidelines.
- b. Lesson structures are changed accordingly for SEND needs
- c. If parents fail to provide us with important accurate SEND information, or if a plan is in place and this is not made clear upon enrolment, The Bandwagon Ltd. cannot be held responsible for any disciplinary or behavioural issues occurring between students if this information has been withheld.
- d. The Bandwagon Ltd reserves the right to refuse admission of any students whose SEND requirements may be deemed outside the scope of our ability to provide appropriate support or access.

6. Record Keeping and Data Protection

- a. Any child protection concerns made to Bandwagon staff or officers must be documented using the standard templates available at the following site:

<http://www.schools.norfolk.gov.uk/Behaviour-and-safety/Safeguarding/Forms-and-templates/index.htm>

- b. If appropriate, a copy must be kept in The Bandwagon Ltd. central filing system, separate from the child's regular file
- c. Reports can only be viewed by appointed safeguarding officers or any approved individuals involved with the safeguarding case in question.
- d. Every effort must be made to keep information safe and secure in accordance with the General Data Protection Regulation and The Bandwagon Ltd. Privacy Policy (Appendix B)

Appendix B

PRIVACY & CCTV POLICY

The Bandwagon Ltd.

INTRODUCTION

This Privacy Policy sets out the way The Bandwagon Ltd. processes your information and details, and that of the students who use our services. We'll keep this policy updated to show you how we use your personal information so that you can be confident when sharing your information with us that it will only be used for what we say here.

WHO WE ARE

The Bandwagon is a 2016 Mercedes Sprinter Van which has been converted into a mobile music classroom, recording studio and much more. Comprising cutting edge technology and over 15 years of industry experience, the Bandwagon provides a hands-on experience for students to access and develop instrumental skills and the opportunities to refine these musical abilities in a safe, fun and inspiring way. Our company number is 10367962.

LEGAL BASIS AND LEGITIMATE INTEREST

When the Bandwagon Ltd. collects and processes your personal information, we will do this according to at least one of the legal grounds permitted in Data Protection law (GDPR as of 25th May 2018). We have a legitimate interest in collecting your information at the point of booking to process your information onto our secure system, get your child booked onto sessions and to send you payment requests. You will have provided your consent for us to

collect this information via an opt-in form on our website. After 25th May 2018, new clients will have to consent separately to receive marketing emails from us, however existing customers can opt out of this at any time.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy and that does not intrude on your privacy or previously expressed marketing preferences.

WHAT INFORMATION DO WE COLLECT

This will depend on the nature of your interaction with The Bandwagon Ltd. but will as a minimum include the following information. This information may be collected from post, digital sources such as our website, telephone or SMS.

- Your name
- Contact details – telephone number and email address
- Your child's name and instrument choice

We may also collect information under the following circumstances and only with your consent.

- If your child has any special requirements for their sessions, such as medical or learning support, then we may also require this additional information to facilitate the session.
- If your child is taking part in a Bandwagon event, we may require additional information such as emergency contact information. If emergency contact information is captured this is to be used in connection with the specific event(s) and will be deleted no later than 28 days after the event has taken place.

USE OF CCTV IN THE BANDWAGON

For the comfort and safety of your children, for Child Protection purposes and for crime prevention, the Bandwagon is fully fitted with a CCTV system. You will have to provide additional consent at the point of booking to allow your child to be filmed and this consent must be given for your child to take part. The imagery captured on the CCTV system is stored securely on an CCTV server for up to 1 month. However, where a law enforcement body is investigating a crime and may ask for imagery to be preserved, then information

will be retained for this time period, and then deleted once any investigation has been completed.

Individuals (or the parent/guardian of an individual if they are a child) whose information is recorded a right to be provided with that information or, if they consent to it, view that information. The Bandwagon has an obligation to provide you with this information within 40 calendar days of receiving a request and may be accompanied by a charge of no more than £10 in order for us to process the request on the CCTV system. Steps may be taken to protect the privacy of other individuals that appear on the imagery if their information or details are visible and are not needed for the purposes of your request.

WHAT DO WE DO WITH THE INFORMATION YOU SUPPLY?

We use the information you supply to:

- Keep accurate records of current and active students and parents so that we can provide you with the best possible service.
- Be able to contact you in an emergency during a Bandwagon session if necessary.
- Process and send invoices for payment of Bandwagon sessions via email using our online accounts client “QuickBooks”.
- Comply with a legal duty such as crime prevention or Child Protection.

We want to provide a positive experience for you, as well as use our resources effectively. Therefore, we may also:

- Contact you if you complete, but don’t submit, an online form to see if we can assist with any problems you may be having with our website.

Where you have agreed to receive email marketing communications from us (after 25th May you will have to consent to this separately as a new client), we will add your address to a newsletter client list “MailChimp” where it will be stored securely on their servers. You can unsubscribe at any time to our marketing emails using the links in the emails or by contacting us, however if you are currently using our services, we will still need to contact you about invoices and account management.

WHO DO WE SHARE INFORMATION WITH?

The Bandwagon Ltd. will not disclose any of your personally identifiable information, except in the following circumstances:

- We may need to disclose your details if required to the police, regulatory bodies or legal advisers.

- To provide you with Bandwagon services, we securely store your data on the following platforms. – MailChimp (for newsletters, account communications and enrollment data) QuickBooks (for invoicing and payment) and WordPress (if you filled in an enrolment form before 2019, or if you fill in any of our event registration forms).
- From time to time, the Bandwagon may use freelance administrators to help with the day to day running of the business. These administrators are bound under this Privacy Policy when working with The Bandwagon and will be obliged to sign a confidentiality agreement, and to show us how they will be storing your data to ensure it is safe. Once their period of work with the Bandwagon is completed, they will be required to delete any information they hold about Bandwagon clients or students.

HOW LONG DO WE RETAIN YOUR INFORMATION?

We hold your information only as long as necessary for each purpose we use it. For example:

- Personal information will be held on our central databases listed above for as long as the student is actively taking part in Bandwagon sessions. Once a student decides to stop sessions, the information we hold about them and you will be held for no longer than 28 days after their last session to ensure there is time to complete any follow up work. We may however need to retain information for longer if there are any outstanding balances that are owed to us. Once full payments have been received, data will be deleted straight away if the period is then outside of the 28-day retention period.
- Emergency contact information (if it is different than the normal details we have on record for you) is only held for up to 28 days after the event has been completed, then this information is removed from our systems.
- If you request that we stop sending you marketing materials we may keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us (i.e. a “no contact” list). Once you stop using the Bandwagon services, your data will be deleted from this list after the usual 28 days.
- EXCEPTION for HMRC: Our accounting and invoicing system is online (QuickBooks), and HMRC requires that accounting records be kept for a period of 6 years so that accurate VAT and tax assessments can be performed. The information held about you in QuickBooks comprises of only name, child name (for reference purposes) and email address and cannot be used for any purposes other than for keeping accurate accounting records. This data is held securely on QuickBooks’ encrypted system. You have the right to request access, alteration or deletion of this information at any time (if there are outstanding payments to be made to the Bandwagon, we may keep your

data for longer until your account is clear). For more information about QuickBooks Privacy Policy, head to <https://quickbooks.intuit.com/global/privacy/>

MARKETING

You are in control and you can change your preferences at any time, but we hope that you will find our communications useful and informative. You can decide not to receive marketing communications or change how we contact you at any time. If you wish to do so please contact us emailing info@thebandwagon.uk, by writing to The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD or calling 0800 520 2529 (Mon-Fri 9am-5pm).

What do we mean by marketing?

Marketing does not just mean offering things for sale, but also includes news and information about:

- What the Bandwagon does and any changes/updates to our services
- Updates about what the Bandwagon is working on
- Events and performances coming up
- Any special products, services or specials offers with the Bandwagon.

When you receive a communication, we may collect information about how you respond to, or interact with, that communication, and this may affect how we communicate with you in future, e.g. MailChimp, our email client, keeps statistical records of who has opened, viewed and interacted with emails that have been sent which allows us (and only us) to make sure our emails are getting through to you. This information is stored securely within Mailchimp's encrypted servers and will never be sold to a third party. For more information about Mailchimp's privacy policy – head to <https://mailchimp.com/legal/privacy/>

WE WILL KEEP YOUR INFORMATION SAFE

We are committed to keeping your personal data safe and secure and we take all necessary steps to make sure your details are held securely. We will never sell or swap your information with charities, organisations or any third-party advertisers or marketers.

If you choose to use our Client Portal on our website (coming soon), your account is password-protected so that only you and those you designate can access it and view the member information relevant to your account. Ultimately, you are responsible for maintaining the secrecy of your passwords and any account information. We also do

everything in our power to protect your information off-line, and only authorised personnel can view your data.

WEBSITE COOKIES

The Bandwagon does not use cookies on its website, so you will not see a cookie consent alert when you visit the site.

WEBSITE FORMS

When filling in a form on our website, your data will be sent securely to our central database stored via WordPress or Mailchimp. We make every effort to protect the loss, misuse, and alteration of the information under our control.

WEBSITES LINKS TO THIRD PARTIES

We cannot be held responsible for the privacy policies of third party websites and we advise users to read the privacy policies of other websites before registering any personal data.

KEEPING YOUR INFORMATION UP TO DATE

The accuracy of your information is really important to us. We want to ensure that we can communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us:

Email us at: info@thebandwagon.uk

Write to us at: The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD

Call us on: 0800 520 2529 (Mon-Fri 9am-5pm).

You may also choose to stop receiving further marketing emails from the Bandwagon Ltd. at any time by clicking the unsubscribe link at the foot of marketing emails from us, but please be aware we will still email you with important account information and details if you are an active user of our services.

RIGHT OF ACCESS, CORRECTION OR DELETION OF YOUR INFORMATION

You have a right to ask for a copy of the information we hold about you. If you spot any mistakes, please let us know and we will correct them. You also have a right to request that your data be deleted if you are no longer a user of our services. This will be done automatically 28 days after the last use of the services; however, you can request that this is done sooner.

If you want to access your information, or request early deletion of your information, send a description of the information you want to see via post to The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD or email info@thebandwagon.uk with the subject heading "Request for my data to be accessed/deleted"

To protect your data, and that of other individuals, we may request proof of identity before making any changes to your information.

For further information see the [Information Commissioner's guidance](#)

CHANGES TO THIS POLICY

We may change this Privacy Policy from time to time as we change and improve the Bandwagon's services. If we make any significant changes in the way we treat your personal information we will make this clear on The Bandwagon website and/or by contacting you directly.

This policy was last updated on 8th March 2019.