

Christie's Education Safeguarding Policy

1. Introduction

Christie's Education Limited recognises that it has a pastoral/moral duty to safeguard and promote, so far as reasonably practicable, the welfare of children and vulnerable adults who may have access to its services or activities. It also wishes to work with statutory and voluntary local agencies to assist them in discharging their duties to ensure that children and vulnerable people are not put at risk of harm or abuse. Christie's Education Limited recognises that abuse can take many forms and may be physical, sexual or emotional or may arise through neglect. Accordingly, Christie's Education Limited wishes to adopt a mechanism for reporting allegations or suspicions of abuse in respect of children or vulnerable adults in accordance with this policy.

Christie's Education Limited also has obligations under health and safety, Prevent and other relevant legislation and in respect of its duty of care to staff and students. This policy complements other policies made in respect of those obligations.

2. Definitions and Scope of Application

For the purposes of this policy the term "vulnerable persons" shall be used to refer to:

- Children; and/or
- Persons of any age who by reason of some disability or infirmity, whether mental or physical, are particularly prone to risk of physical, sexual, emotional abuse, neglect or radicalisation; and/or
- Persons of any age who are vulnerable to radicalisation and as a result may be drawn into terrorism.

All Christie's Education Limited's staff (which includes any employees of a Group Company who work wholly or mainly in the United Kingdom for or within any Christie's business, including such employees of Christie, Manson & Woods Limited and such employees deployed to work within Christie's Education) are required to familiarise themselves with this policy, refer to it when they come in contact with vulnerable persons and comply with it. "Group Company" means Christie's International plc. or any of its subsidiaries (as defined in section 1159 Companies Act 2006 as amended).

Christie's Education Limited undertakes to inform new staff about the application of this policy.

The following is a non-exhaustive list of examples of situations in which staff may come in contact with vulnerable persons:

- the provision of health-related services;
- open days and events.

This policy is relevant in all situations when a vulnerable person is at risk of exploitation, harm or abuse (including radicalisation) and identifies the action that may be taken by Christie's Education Limited in response. Situations which may trigger one or more of the obligations and procedures under this policy include (but are not limited to) when:

- a vulnerable person makes an allegation of abuse or harm;
- suspicions arise or there are any indications that a vulnerable person is being abused, harmed or exploited. This includes radicalisation;
- there are noticeable changes in a vulnerable person's appearance or behaviour which suggest that that person is being subject to abuse, harm, exploitation or radicalisation;
- concerns are raised that an individual's actions pose a risk to vulnerable persons. An example of such a situation is when a student is suspected of distributing extremist material. This would trigger the risk assessment procedure discussed below.

3. Key Elements

Christie's Education Limited will take all safeguarding concerns including suspicions and allegations of exploitation, harm, abuse or radicalisation seriously and will report concerns promptly.

Christie's Education Limited will take reasonable care to employ staff who are to its knowledge of good character and who are unlikely to pose a threat to vulnerable persons. In particular, Christie's will have in place processes for checking the suitability of staff whose duties and responsibilities involve regular contact with vulnerable persons. Criminal records checks will not be carried out unless they are permitted or required by law.

Referrals will be made to the relevant agencies on the basis of identified and considered risk. Christie's Education Limited's risk assessment procedure is outlined below. Furthermore staff dealing with students who are subject to safeguarding concerns will consider what support may be offered to them both from within Christie's Education Limited and externally. They will be encouraged to seek support and will be reminded of the support services provided by Christie's Education Limited.

4. Designated Safeguarding Officers

The Director of Registry and Student Services, Fiona Guernaoui, has been appointed to act as Christie's Education Limited's Designated Safeguarding Officer ("DSO").

The responsibilities include:

- undertaking relevant training in safeguarding procedures and ensure their knowledge is kept up to date;
- acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;

- acting upon concerns as appropriate in the circumstances, including by making external referrals;
- working with management and staff to ensure that staff are informed of this and related policies and procedures;
- working with management and staff to reduce the potential for abuse within Christie's Education Limited; and
- monitoring the implementation of this policy.

The DSO may appoint a nominee to act on his or her behalf.

5. Reporting

If there is any immediate risk of harm please call the Christie's Education switchboard on 020 7389 2004 without delay. If the call is not answered or it is more appropriate in the circumstances, report the matter directly and immediately to the police by calling 999 and inform Fiona Guernaoui about the matter as soon as possible thereafter.

It is the remit of Social Services and/or the Police to investigate safeguarding concerns. Christie's Education Limited will undertake a risk assessment before making a referral to such an external agency. Usually a report will be made where there is a risk of serious harm and/or circumstances are such that the risk relates to conduct that is likely to amount to a criminal offence.

Concerns can be raised by sending an email to FGuernaoui@christies.com or by telephone on 020 73892004. You may also wish to discuss your concerns in person with either the Director of Registry and Student Services or the Student Services Officer.

It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain.

Staff or students who wish to discuss any safeguarding concerns or matters concerning this policy should contact the DSO. If they are unavailable or the concern involves the DSO then the Student Services Officer should be contacted.

6. Risk Assessment

Risk Assessment Overview

If a safeguarding concern is raised with a DSO a risk assessment is undertaken to assess the appropriateness of a referral to Social Services or the Police.

The DSO is responsible for ensuring that a record of the risk assessment process and the outcome of the risk assessment is made, and any appropriate follow up action is undertaken.

Christie's Education Limited will liaise with other partner agencies as appropriate in order to address the safeguarding concerns identified.

Risk Assessment Procedure

Safeguarding concerns (whether in relation to staff or students) are managed by the Student Services Officer on behalf of the DSO (the "Investigation Leader") will make an initial assessment of the report. This may include research of publicly available information concerning the individuals concerned. If the concerns are considered to be legitimate a case conference will be called and the Investigation Leader must immediately report to and consult with the relevant DSO about the case.

A meeting to discuss the case should be held usually within five working days from when the report is made unless this is impracticable, in which case the meeting must be held as soon as possible thereafter. Staff involved must give priority to such meetings. The meeting will involve such persons as the Investigation Leader and/or the relevant DSO deem appropriate in the circumstances, depending on the potential issues which the case involves.

The case meeting will have the purpose of sharing information about the individuals concerned and about the situation, to conduct an assessment and to ascertain whether the risk merits an external reference to the relevant authorities.

The Investigation Leader will draw up a risk assessment report on the basis of the information shared in the case conference and containing any recommendations, particularly recommendations to refer the matter to a relevant authority, which report shall be forwarded to the DSO who is responsible.

Once approved, any action identified in the report will be managed by the DSO. The completed risk assessment will usually be shared with the relevant external authority if any recommendation to refer is approved. This information is shared on the basis that Christie's Education Limited is satisfied that legal duty to refer/public interest in referring outweighs the need to protect the personal information of the individual concerned. In addition and in view of the risks which could be posed to vulnerable persons, such sharing is considered to be necessary to protect the vital interests of a person or is in the public interest to prevent an unlawful act.

Safeguarding cases will be considered closed once internal procedures have been exhausted and once an outcome has been reached as a result of any external referral. Cases for individuals who are referred to the Channel process will remain open by Christie's Education Limited until the intervention has ceased and/or the person concerned ceases to be a student of Christie's, whichever is sooner.

7. Action by Christie's Education Limited

Christie's Education Limited reserves the right to take action under its disciplinary procedures should it discover that its conduct standards may have been breached including disciplinary action against staff/students against whom allegations are made, where appropriate.

Support from internal or external services will be provided as appropriate for any individuals, staff or students who are the subject of allegations regarding safeguarding matters.

The matter be reported to the Disclosure and Barring Service where required by law to do so.

8. Training

All staff whose roles and responsibilities include regular contact with vulnerable persons will receive training and guidance appropriate to their role. All staff will be made aware of this policy and procedure and related guidance.

9. Prevent

Most education institutions, including Christie's Education Limited, are required by the Counter Terrorism and Security Act 2015 to have "due regard to the need to prevent individuals from being drawn into terrorism". This means that institutions now have a

statutory duty to engage with the government's Prevent agenda. The "Prevent Duty" seeks to safeguard individuals from being radicalised and being drawn into terrorism, and it applies to all kinds of extremism.

The government has published guidance setting out what steps the institutions specified by law are expected to take to meet this duty. This is available on::

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

Individuals who Christie's Education Limited considers to be at risk of radicalisation and will be assessed for their suitability for the Channel process.

If a member of staff has any concern that a person may be vulnerable to radicalisation the concern should be reported this using the same procedure set out above, under 'Reporting'. Concerns will be dealt with professionally and sensitively.

If there is an immediate risk of harm to any person or a crime may have occurred the police will be contacted. If there is no immediate risk, an internal case conference will take place and a risk assessment completed in accordance with the normal procedure. On the basis of the report a decision will be made on whether the case needs to be referred to the Regional Prevent Coordinator.

If the case is not referred to the Regional Prevent Coordinator, the person concerned may nevertheless be offered help internally, only if it is considered appropriate to offer such help.

If the case is referred to the Regional Prevent Coordinator, the DSO will discuss the case with the Regional Prevent Coordinator, sharing the risk assessment and may do so initially without identifying the individual who is the source of concern, depending on the circumstances. Using the risk assessment as well as any other source of information that may already be available to the police, the Regional Prevent Coordinator will conduct a vulnerability assessment and may decide to refer the case to Channel.

Channel is an early intervention multi-agency process designed to safeguard vulnerable persons from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable persons.

- Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.
- A Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels a person would be suitable for Channel, it will look to develop a package of support that is bespoke to that person. The partnership approach ensures that those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.
- Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

- A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Christie's Education Limited is mindful of the risks of bullying, discrimination and harassment and will therefore exercise due care to ensure that this policy is not used for making malicious or frivolous reports.

10. Monitoring and Improvement

Written records of any safeguarding concerns will be retained by the DSO for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.

Such written records will be held centrally and separately from a member of staff's or student's personal records.

The DSO will report this information in an anonymised form to the Christie's Education Board on a yearly basis. The report will be treated as confidential. If any concerns or patterns of abuse emerge from this report they will be dealt with appropriately. The report will also be used for the purpose of improving this policy and the related procedures, which will in any case be reviewed and updated from time to time by the Christie's Education Board of Directors.

11. Further Assistance

More information on this policy and the related procedures is available from the DSO.