

# NEW LONDON MUSIC ASSOCIATION

## POLICY STATEMENTS – GENERAL

*The policy statements given here are accompanied by detailed procedures, which may be seen by applying to The Administrator.*

### **1. Bursaries and Scholarships**

1. The Association is committed to awarding bursaries and scholarships to encourage and enable the widest possible access to its activities and to ensure that all participants have a high-quality educational experience.
2. Bursaries are awarded to those who would find it difficult to afford the full cost of attendance; scholarships are awarded to those who would significantly improve the experience of participating for other members, whether because of the standard of the applicant's playing or singing, or a need for the instrument or voice concerned.
3. The amount of each bursary or scholarship will normally be capped at the level of the tuition element of the full course fee; however, in exceptional circumstances, and/or where the applicant is able and willing to provide assistance with the running of an activity or event, that limit may be exceeded at the joint discretion of the Administrator and the Director.
4. In exceptional cases, consideration may be given to the award of both a bursary and a scholarship to same individual, up to the full cost of the activity, but The Association's preference is to help as many people as possible, rather than to favour a few in this way.

### **2. Confidentiality**

1. The Association requires its Staff and Trustees only to disclose information about its work, whether directly or indirectly, to those who are authorised to receive it.
2. Staff and Trustees must not use for their own purposes or profit, or for those of any other organisation, any commercially sensitive information to which they have access during the course of their work for The Association.
3. The rules concerning disclosure of information apply both during and after engagement with The Association for a period of two years, unless otherwise specified.
4. Any breach of confidentiality will be investigated and may result in dismissal or, in an extreme case, legal action.

### **3. Complaints**

1. Complaints are rare, but The Association treats them seriously when they do arise.
2. Complaints will be investigated promptly and impartially, according to the provisions of the Complaints Procedure (see below).
3. Every effort will be made to find a mutually agreeable resolution to a complaint, but where this is not possible, the matter will be referred to the Director, whose judgment will be final. (See the associated procedure for complaints against the Director.)

### **4. Conflicts of interest**

1. The Association is committed to ensuring that its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with it.
2. The Association will ensure that all those involved in making decisions on its behalf (such as Trustees, other Committee members and the Director) understand what constitutes a conflict of interest and that they have a responsibility to recognise and to declare any conflicts that might arise for them.
3. The Association will document all conflicts of interest (for example in the minutes of Committee meetings) and the action(s) taken to ensure that the conflict does not affect the decision-making of the organisation.

### **5. Donations**

1. The Association's trustees recognise their responsibility to act reasonably and prudently in The Association's interests and, to that end, will only refuse donations if to accept

them would be more detrimental to The Association.

2. A decision to refuse or accept a donation will only be taken after careful analysis and consideration, and on a case-by-case basis.
3. The NLMA Treasurer has delegated authority to take such decisions where they are clear cut, and she or he will refer to the Chair any cases where acceptance might compromise The Association's values or reputation in some way.

## **6. Environmental**

1. The Association is determined to serve the best interests of the community by protecting and, wherever possible, promoting improvement of the environment.
2. The Association undertakes to ensure that environmental priorities are integrated into the decisions that it takes, including to:
  - a. make the most efficient use of energy
  - b. minimise and where possible eliminate all forms of pollution
  - c. avoid waste and encourage conservation, reuse and recycling
  - d. avoid environmental damage
  - e. promote a sense of responsibility and understanding of the environment by raising awareness among staff and, where possible, other stakeholders
  - f. review and, where possible, improve its performance on environmental issues each year.

## **7. Equal Opportunities**

1. The Association is an organisation that provides educational activities for adult amateur musicians. We aim to ensure that those activities are open and welcoming, and we will treat all involved equally, including our volunteers, staff and supporters, regardless of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation, class and socio-economic background.

## **8. Expenses** (see also Section P of the Finance Policy)

1. No-one should be disadvantaged by serving The Association and, to that end, The Association will reimburse reasonable additional expenses (only) incurred as a result of carrying out Association business. It is important that the rules governing the claiming of expenses are treated in this spirit.
2. For the purpose of reimbursing expenses, 'Association business' is defined as being:
  - a. Attendance at full Committee meetings
  - b. Attendance at any sub-groups of the Committee authorised by the Committee
  - c. Attendance at any exceptional meetings called, or authorised in advance, by the Chair of the Trustees
  - d. Representing the Association at external events at the written request of the Chair.

## **9. Gifts and Hospitality**

1. All offers of gifts and hospitality made in connection with The Association's work must be declared, regardless of value and whether accepted or declined. Declarations will be recorded on the NLMA Gifts and Hospitality Register, which is maintained by the Administrator.
2. Staff and trustees should ensure that they are not placed in a position that risks, or appears to risk, compromising their role, or could create an impression that they have been influenced while acting in an official capacity; however, offers of hospitality may be accepted where there is a genuine business reason and the level of the hospitality is appropriate to the business activity, and token gifts with a monetary value of less than £50 may be retained.
3. This Policy applies equally to spouses, partners and other associates if it could be argued or perceived that the gift or hospitality is in fact for the benefit of the member of staff or trustee.

## **10. Harassment and Bullying**

### **Definition**

Harassment and bullying are:

- unwanted conduct, whether verbal or not, often (but not exclusively) on grounds of sex, sexual

orientation, marital or civil partner status, gender reassignment, race, religion, colour, nationality, ethnic or national origin, disability, HIV/AIDS status or age; or

- intimidating, offensive, malicious or insulting behaviour; or
- unfavourable conduct, whether verbal or non-verbal, towards someone, based on her or his disability, which could affect that person's dignity.

### ***Policy statement***

1. The Association requires all staff, trustees and members to treat each other with respect and to understand that behaviour that they might find acceptable may not be regarded as such by others.
2. The Association is opposed to harassment and bullying in all their forms, and will investigate any cases brought to its attention.
3. The Association requires that all those involved in its work are professional in their dealings with each other. Those responsible for the management of others must take particular care to ensure that they deal with subordinates in an appropriate manner. Managers and supervisors are also required to ensure that their subordinates behave appropriately to one another.
4. A single incident of unwanted or offensive behaviour can amount to harassment if sufficiently serious.
5. Any person guilty of harassment or bullying will be subject to disciplinary action, which could ultimately lead to dismissal or exclusion from The Association's activities.
6. Any person who believes that she or he has been harassed or bullied should follow the procedure accompanying The Association's Complaints Policy (Section 3 above).

## **11. Health and Safety**

### ***Policy statement***

1. The Association is committed to providing a healthy and safe environment for all those involved in the activities that it organises. This includes, but is not limited to: members, staff (including freelance), volunteers and members of the public involved in, for example, rehearsals and concerts.

### ***Responsibilities***

1. The Committee has overall responsibility for health and safety.
2. Practical responsibility for health and safety at events and activities organised by The Association rests with Suzanne Meaden (Administrator), assisted by Lorraine Collins (Committee member).

## **12. Investment**

1. Given their modest scale, The Association's policy is to invest its reserves in such a way as to minimise risk and costs, accepting that this may limit potential returns. In practice, this means a mixture of easy-access and short-notice bank accounts, thereby keeping associated charges to a minimum, combined with low-risk investments in funds designed specifically for charities, where the trustees deem this appropriate.

## **13. Public Interest Disclosure (PID/ 'Whistleblowing')**

1. The Association believes that its staff, trustees and other stakeholders should be able to raise genuine concerns about malpractice at the earliest practicable stage without fear of repercussions to the individual, thereby helping to promote a culture of openness and shared integrity throughout the organisation.
2. To facilitate the rapid disclosure of malpractice, The Association will publish a detailed PID Procedure both in this Handbook and on its website.
3. If having followed the PID Procedure the person making the disclosure is not satisfied with the action taken, she or he may raise the matter on a confidential basis directly with any appropriate public authority, having first informed the Chair of the Committee.

## **14. Quality Assurance**

1. The Association aims to meet in full, or to exceed the requirements of its members and other stakeholders, particularly in relation to its contracts and activities. To this end, The

Association's policy is to:

- a. provide its Members and other stakeholders with services that are completed on time, within budget and to the required quality standard
- b. ensure that all involved in delivering The Association's services understand the importance of quality in their work
- c. accept the need to engage only those working practices that will assure the required standard of quality and will maintain The Association's ethos of 'friendship in music'
- d. nominate key personnel (i.e. the Director and the Administrator) and charge them with the continuous examination and improvement of quality.

## 15. Reserves

### **General reserves**

It is The Association's policy to maintain General Reserves sufficient to enable it to:

- a. Mitigate its principal risk: a sudden loss of operating venue(s)
- b. Continue to fund bursaries and scholarships for those who deserve them
- c. Undertake modest developments in provision from time to time.

### **Other reserves**

The Association's other reserves are held in a restricted fund ('The Memorial Fund'), which is used solely to fund bursaries.

## 16. Risk Management

1. The Association's trustees recognise and accept their responsibility regularly to review and assess the risks faced by The Association in all areas of its work, and to plan for the management of those risks.
2. The Association's risk management process will:
  - a. be tailored to fit its circumstances
  - b. be reviewed regularly to ensure currency
  - c. focus on identifying any major risks.
3. The trustees will set a risk framework that allows them to make decisions about how to respond to the risks that they face and to make an appropriate statement regarding risk management in their annual report.
4. The Association believes that risks can present opportunities, and that taking advantage of opportunities often involves a degree of risk; it is therefore not the Association's policy to avoid risk altogether but, rather, to manage and mitigate it where possible.
5. Taken as a whole, the Association's risk appetite is best described as 'low-medium', given its size and limited resources – both human and financial. In the light of this, any initiative or development that may involve a call on the Association's reserves must first be approved by the Committee on the basis of a written, costed, proposal.

## 17. Safeguarding

### **Introduction**

1. The Association is a registered charity and as such is regulated by the Charity Commission, principally under the provisions of the Charities Act 2011.
2. The Association's mission relates primarily to adult learners, and it will only permit children to join its activities exceptionally and if they are in the care of a responsible adult acting *in loco parentis*; nevertheless, it recognises that it has a general duty of care to such children and a specific responsibility regarding any vulnerable adults who declare their condition when registering with The Association.
3. The Association also recognises that its staff may be vulnerable to malicious and erroneous allegations, and this policy and its associated code of conduct are therefore designed to help protect all who learn, teach, administer and manage for the NLMA. It aims to provide a framework within which children and vulnerable adults can participate safely and confidently in The Association's activities, and in which staff have appropriate guidance and support when carrying out their duties.

## **Definitions**

For the purposes of this document:

1. a 'child' is a person under the age of 18 (as defined by the UN Convention on the Rights of the Child)
2. a 'vulnerable adult' is a person over the age of 18 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (*Who decides?*, Lord Chancellor's Department, 1997)
3. 'clients' are children and vulnerable adults engaged in NLMA activities
4. 'staff' includes all NLMA employees, contractors, engaged artists, teachers, trustees and volunteers who encounter clients.

## **Indicative sources**

1. This policy and the accompanying code of practice have been based on law and guidance that seeks to protect children and vulnerable adults, including:
  - a. Children Acts of 1989 and 2004
  - b. Data Protection Act 1998
  - c. Sexual Offences Act 2003
  - d. Protection of Freedoms Act 2012
  - e. Relevant government guidance on safeguarding children and vulnerable adults, including
    - i. *Keeping children safe in education*, Department for Education, 2016
    - ii. *Working together to safeguard children*, HM Government, 2013
    - iii. *No secrets*, Department of Health, 2000, revised 2015
    - iv. *Prevent Strategy*, HM Government, 2011
    - v. *The Prevent Duty*, Department for Education, 2015
    - vi. *National Guidance for Child Protection in Scotland*, The Scottish Government, 2014
    - vii. *Children and young people: rights to action*, The Welsh Assembly Government, 2004
  - f. Relevant policies and publications of other organisations including the NSPCC, the Incorporated Society of Musicians, and the National Youth Orchestra

## **Policy statement**

1. The Association recognises that:
  - a. it has a responsibility for the safety of its clients, protecting them from abuse or neglect
  - b. good safeguarding policies and procedures are of benefit to everyone involved with its activities, including its staff
  - c. the welfare of the client is paramount
  - d. all clients, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity have a right to equal protection from all types of harm or abuse
  - e. some clients are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
  - f. working in partnership with clients, their parents (where appropriate), carers and other agencies is essential in promoting clients' welfare.
2. The Association will seek to keep its clients safe by:
  - a. valuing, listening to and respecting them
  - b. adopting good safeguarding practices through a code of conduct for staff and volunteers
  - c. providing effective management for staff and volunteers through supervision, support and training
  - d. recruiting staff safely, ensuring that all necessary checks are made
  - e. sharing information about safeguarding with clients, parents (where appropriate), and staff
  - f. sharing concerns with agencies who need to know, such as the police, local authorities and/or children's services as appropriate
  - g. assessing risk in relation to all activities, focusing on preventing and minimising risk
  - h. maintaining a standing Trustee-Management Safeguarding Group
  - i. reviewing its policy and procedures annually.
3. A culture of mutual respect between clients and staff is strongly encouraged, with staff being expected to model good practice. It is part of the NLMA's responsibility in the duty of care towards its clients that anybody who encounters safeguarding concerns will be supported

when they report their concerns in good faith.

4. All staff who have unsupervised access to, or contact with, clients are required to be familiar with this policy and the associated code of conduct, and to:
  - recognise and accept their responsibilities
  - develop awareness of the issues that cause children harm
  - report concerns to the Designated Safeguarding Officer and/or, or the Senior Decision-Maker as soon as possible (see accompanying code of conduct for details).