

Policy for the safeguarding and protection of children and adults at risk (Safeguarding Policy)

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1. Introduction

The London Philharmonic Orchestra (LPO) is committed to good practice, which safeguards and protects children and adults at risk from harm. LPO staff, musicians, amateurs (workshop leaders), Board members and trustees recognise their responsibility to ensure that they, other professionals engaged by them, orchestral musicians, project leaders, volunteers and others who may work on activities where contact with children or adults at risk is anticipated, ensure that these activities take place in an environment that promotes the safety and wellbeing of children and adults at risk. This policy has been devised with reference to the regulatory framework for child protection and safeguarding, including the Safeguarding Vulnerable Groups act 2006.

Definitions

- The Disclosure and Barring Service (DBS) is the Government agency that helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children, by undertaking criminal records checks and checks against statutory barred lists.
- Children are defined as young people under the age of 18.
- “Adults at risk” are all those over the age of 18 who:
 - have needs for care and support and;
 - are experiencing, or at risk of, abuse or neglect; and
 - as a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

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- LPO staff means employees of the LPO. The term LPO staff does not include LPO musicians, extras, amateurs, freelancers or other person engaged to work with the LPO who is not an employee.
- LPO musicians and amateurs includes LPO orchestral players (members and extras), freelance workshop leaders and other musicians involved in LPO projects (including participants on the LPO's Rising Talent programmes working on other Education and Community projects).
- A participant is defined as any child or adult at risk taking part in an LPO project or event.

Policy aims

The LPO is committed to a child and adult at risk-centred approach. This means:

- We put the dignity, wellbeing and safety of every participant first
- We seek to achieve a balance between artistic outcomes and the social, emotional, intellectual and physical needs of the participants
- Professional relationships between LPO musicians and amateurs and participants are based on mutual trust and respect and must remain appropriate at all times
- The feelings and concerns of any participant, their parent or carer, are listened to and acted upon appropriately
- We are committed to maintaining an attitude of "it could happen here" and to supporting LPO staff, musicians and amateurs who raise concerns about the safety and wellbeing of children and adults at risk with whom we work.

Status of the policy statement

This policy statement has been approved by the Board and copies are provided to all LPO staff, musicians and amateurs and partner organisations participating in projects involving children and adults at risk. This policy is available on the LPO website and is reviewed annually by the Board.

2. Roles and Responsibilities

- The Chief Executive is the LPO's Designated Safeguarding Lead (DSL), and is responsible for
 - the management of allegations against staff, musicians or amateurs
 - ensuring new business ventures take safeguarding considerations into account in a proportionate manner
 - providing support to the Designated Safeguarding Officer
 - ensuring that there are safe recruitment and vetting procedures in place for jobs in the LPO
 - reviewing the Safeguarding policy annually or sooner if an incident or change in legislation warrants it, with the DSO
 - In the absence of the DSL, the DSO will deputise
- The Education & Community Director is the Designated Safeguarding Officer (DSO), and is responsible for
 - ensuring the implementation and monitoring of the LPO's safeguarding and child protection procedures
 - receiving, managing and overseeing the appropriate documentation/recording of all child or adult protection concerns on a day-to-day basis. Allegations and concerns will be escalated to the DSL and/or Board as required

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- providing advice and support to those sharing child or adult at risk protection concerns
 - identifying and monitoring training needs and coordinating the delivery of safeguarding training as required
 - ensuring safeguarding issues are appropriately addressed within LPO projects and events, and with partnership projects and events
 - ensuring that appropriate DBS checks are carried out in relation to LPO projects involving children and adults at risk, making decisions in relation to the suitability of individuals for work with children or adults at risk, and overseeing the operational aspects of the DBS application process
 - report to the Board annually on any Safeguarding matters, including ensuring the Safeguarding Policy is kept up to date.
- The Chief Executive and Education & Community Director are responsible for considering (in consultation with other LPO staff and Board members, particularly the Trustee Safeguarding Lead where necessary) whether any incidents involving children or adults at risk should be reported to social care, the police, the DBS or any other relevant authority.
 - Other staff members who are more likely to encounter safeguarding concerns include Education & Community staff and Personnel staff. They are responsible for receiving concerns and passing them to the DSO and/or DSL. They should act on concerns or allegations in the event of an emergency where there is an immediate risk of harm or serious injury.
 - All other staff are responsible for reporting any safeguarding concerns they may have or may have been disclosed to them, to the DSO and/or DSL, who will take appropriate action.

The role of the LPO

The LPO is most likely to come into contact with children or adults at risk through its Education and Community programme, or, less often, through engaging young artists to perform with the Orchestra in its regular programming.

All Education and Community work is organised and the vast majority managed on the ground by the Education and Community team. In the main, other LPO staff members, whether permanent or temporary, do not become directly involved in Education and Community projects, but may be present as observers. There may be some situations where colleagues from other departments staff sessions, especially in residency areas (for example, facilitating a group of students do a 'meet and greet' with LPO players before a concert in a residency location). However, this is only the case where attending children/adults at risk have their own staff or chaperones present.

Where children are formally engaged to participate in LPO performances by the LPO's Concerts department (or any other department) the Good Practice Guidelines at Appendix 1 should be followed.

3. Procedures for working with Children/Young People and Adults at risk

- In most circumstances LPO musicians and amateurs will not be working alone with children or adults at risk participating in a project. Where small group work is taking place on an LPO-run project, a musician or amateur may be alone with children or adults at risk for short periods. Where this occurs the LPO Project Manager or another member of the Education and Community team **must** be

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easily accessible (for example in an adjoining room or corridor). This is to ensure that musicians and animateurs can easily request support and assistance should it be required (for example where children or adults at risk are behaving inappropriately or an accident or medical incident has occurred, or if a child or adult at risk appears uncomfortable in any way).

- LPO staff, musicians and animateurs should always use toilets specifically designated for their use. Separate toilets for participants under 18 should be allocated.
- LPO staff, musicians and animateurs must maintain professional boundaries at all times. Personal contact details should not be shared with children or adults at risk, nor should LPO staff, musicians or animateurs communicate with children or adults at risk using personal phone, email or social media (this would include, for example, accepting friend requests).
- LPO Education & Community staff may communicate directly by phone, text or email with certain participants, if they are participating in LPO activity as individuals, i.e. not as part of a school group or other organisation. This is likely to relate to e.g. LPO Junior Artists – musicians aged 15-19 on a year-long programme with the LPO. When communicating by email, a parent/carer should always be copied in. Communicating with participants by phone/text directly should generally be avoided, but may occur in certain limited situations, e.g. if a participant is running late and calls or texts the Education & Community Project Manager, or in the same situation if the Project Manager calls/texts the participant directly to find out where they are. LPO staff must only communicate using their work phones, never their personal phones. Direct communication by text should only be limited to specific questions/situations and never for general conversation.
- LPO staff, musicians and animateurs should not travel alone with children or adults at risk (for example by giving them lifts in a car). If exceptional circumstances arise that justify a member of LPO staff or a musician or animateur travelling alone with a child or adult at risk, the approval of the LPO Project Manager must be sought and the Education & Community Director should be informed as soon as possible.
- LPO musicians and animateurs should never take photographs or video in the course of any project. LPO staff should not take photographs or video unless this has been specifically authorised in advance by the LPO Project Manager. The LPO Project Manager must ensure that all necessary consents have been obtained before authorising the taking of photographs or video footage. Photographs and video may only be taken on LPO-owned equipment, not personal devices.
- It is not usually appropriate to touch children or adults at risk during project work. However, there may be limited circumstances where touch is appropriate. Examples might include explaining an aspect of instrument technique (for example how to hold an instrument or to demonstrate a hand position). LPO staff, musicians and animateurs should always seek the permission of the child or adult at risk (and their parent or carer, if present) before touching a child or adult at risk. It is **never** appropriate to touch a child or adult at risk on the trunk of the body.
- Circumstances may arise where a child or adult at risk touches a member of LPO staff, or an LPO musician or animateur. This might occur for a number of reasons, including where participants have learning difficulties or other special needs. In such situations, the member of LPO staff, musician or animateur should seek to minimise physical contact, but this should be done in a sensitive manner, appropriate to the circumstances of the individual child or adult at risk. If this has occurred, the LPO staff member, animateur or musician should report the occurrence to the LPO Project Manager who will assess if any follow up action is required (e.g. notifying a parent/carer).

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- LPO staff, musicians and animateurs should treat all participants with courtesy and respect, always paying proper regard to the social, emotional, intellectual and physical needs of the participants. Shouting at children or adults at risk, or other displays of anger or irritation are never appropriate. If participants are behaving inappropriately, LPO musicians and animateurs should seek support from the LPO Project Manager (or the participant's parent/carer if present, or a member of school/centre staff if the work is taking place in a school or disability centre).
- LPO staff, musicians and animateurs should never show favouritism to any individual.
- LPO staff, musicians and animateurs should always give participants enthusiastic and constructive feedback rather than negative criticism.

4. Media

Photographs or video footage of children or adults at risk participating in LPO projects will not be taken unless appropriate consent has first been obtained (this should be obtained either from parents or carers, school or the partner community or disability organisation as relevant). Where photographs and video footage is taken, care will be taken to ensure that the use of such material does not put any child or adult at risk. Such material should not be linked online to any personal information that might put participants at risk. Original photography and video material is stored in secure LPO folders, which can only be accessed by a limited number of clear DBS-checked staff members.

5. Disclosures and reporting procedures

It is possible that, during an LPO Education project, a child or adult at risk might make a disclosure of abuse, neglect or of information that might be an indicator of possible abuse or neglect, or broader safeguarding concerns. It is important that LPO staff, musicians and animateurs know how to respond appropriately to such disclosures. LPO staff, musicians and animateurs should follow these guidelines:

1. Stay calm.
2. Listen carefully to what is said and show that you are taking it seriously.
3. Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
4. Tell the child or adult at risk that the matter will only be disclosed to those who need to know about it.
5. Allow the child or adult at risk to continue at their own pace.
6. Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
 - Good language to use: What/where/who/how. Explain/Describe/Tell
 - Do not ask 'why' questions
7. Reassure the child or adult at risk that they have done the right thing in telling you.
 - However, be careful not over-thank a child or adult at risk for making a disclosure, to avoid the risk of a participant trying to please you. Never offer anything that could be seen as a 'reward' (e.g. I'll buy you lunch, have some free concert tickets) 'in exchange' for a disclosure as this could jeopardise a potential future court case.
8. Tell them what you will do next, and with whom the information will be shared (in the first instance this will be the LPO Project Manager and the Education & Community Director).
9. Make no judgement about what you have heard.

10. Record in writing what was said, using the child or adult at risk's own words, as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. If information that could indicate physical abuse is disclosed, it is sometimes useful to draw a diagram to indicate where on the body the person has described the incident taking place.
11. You should also record in writing any incident of abuse, potential abuse or broader safeguarding concern you witness in the course of your work for LPO and alert the LPO Project Manager and the Education & Community Director as soon as possible. The LPO has a report form template to use for this purpose, and completed forms are stored under password protection in a private drive.
12. Remember that while you may have been the first person encountering an allegation of abuse, neglect or safeguarding concern it is not your responsibility to decide whether abuse has occurred. That is a task for the professional agencies, following a referral from the LPO's DSO or DSL.

6. Signs of abuse and neglect

You should always be alert to possible signs of abuse or neglect and raise any concerns with the LPO's DSO (i.e. the Education & Community Director). Abuse can take many different forms, including emotional abuse, neglect, physical abuse and sexual abuse. Types of abuse may include:

- Bullying and cyberbullying
- Child sexual exploitation
- Child trafficking
- Discriminatory abuse
- Domestic abuse
- Emotional abuse
- Female genital mutilation
- Financial or material abuse
- Grooming
- Modern slavery
- Neglect and acts of omission
- Non-recent abuse
- Online abuse
- Organisational abuse
- Physical abuse
- Self-neglect (in adults) including addiction
- Sexual abuse

Other forms of abuse include: Female genital mutilation, sexual exploitation, radicalization and extremism, county lines, forced marriage, trafficking, 'honour'-based violence, criminal exploitation.

Further information about different types of child abuse and possible signs and symptoms can be found on the NSPCC website: <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Any concerns about the welfare of a child or adult at risk of possible abuse (including disclosures of abuse or incidents of possible abuse), neglect or general safeguarding concerns should be raised in the first instance with the LPO Project Manager if it pertains to an Education project, and subsequently with the LPO's Education & Community Director (the DSO). If the Education & Community Director is unavailable, any concerns should be raised with the LPO's Chief Executive (the DSL).

7. Referrals

Where a serious safeguarding concern or allegation involves a child, a referral should be made to the LADO (Local Authority Designated Officer) within 24 hours. The LADO coordinates the next steps and brings in other organisations (e.g. police, social services) as required.

Where a child or adult at risk is believed to be at risk of immediate serious harm, an immediate referral should be made to the relevant social services, or the police.

Anyone can make such a referral but, where practicable, the LPO Project Manager and Education & Community Director should be consulted first. The LPO Education & Community Director may also consult the Designated Safeguarding Lead of any partner institution (for example a school or day centre for older people) before making such a referral.

Where there is no risk of immediate serious harm to a child or adult at risk but there are concerns about a child or adult at risk's welfare, then the Education & Community Director should decide whether or not a referral to social services is appropriate, in consultation with the LPO's Chief Executive, the Designated Safeguarding Lead at any partner institution and, where appropriate, members of the LPO Board. The reasons for any decision to refer (or not refer) should be carefully recorded, along with the names of those consulted when making the decision.

Where a criminal offence is suspected, it will normally be for social services to consider the situation and refer the matter to the police, if necessary.

Any member of LPO staff, musician or amateur who considers that a situation has not been adequately addressed should press for reconsideration of their concerns.

8. Disclosure and Barring Service (DBS) checks

LPO staff and LPO musicians and amateurs engaged in "regulated activity" must have undertaken an enhanced DBS check with barred list check. It is acknowledged that some LPO musicians or amateurs may not come within the statutory definition of "regulated activity" (because the work they undertake with children or adults at risk may not take place every week or for more than three days in a 30-day period). However, the LPO's expectation, on advice from the Incorporated Society of Musicians, is that all LPO staff, musicians and amateurs who work directly with children and adults at risk should be subject to an enhanced DBS check (even if they are not in "regulated activity" and are therefore not eligible for a barred list check).

The LPO will facilitate the appropriate checks for all LPO staff, musicians and amateurs including paying the necessary application fee. However, where a member of LPO staff, or an LPO musician or amateur already has an enhanced DBS check for the appropriate workforce (i.e. children or adults at risk) from a previous employer or other organisation **and has already subscribed to the DBS update service**, no further DBS check will be required. The LPO will undertake a free online check (provided the member of LPO staff, LPO musician or amateur gives their permission and discloses a copy of their DBS reference number). Where LPO staff, musicians or amateurs have **not** subscribed to the DBS update service, a fresh DBS check will need to be undertaken in respect of their work at LPO.

All DBS checks must be renewed (or a further online check be carried out via the DBS update service) at least every three years. DBS checks may be repeated more frequently than every three years where it is reasonably practicable and cost-effective to do so (for example where musicians and amateurs have subscribed to the DBS update service).

Situations where it is impractical to obtain an enhanced DBS check

In exceptional and rare circumstances, where there are valid reasons why it has not been possible to obtain an enhanced DBS check in time for a project in which musicians/animateurs work directly with participants, the Education & Community Director may, in consultation with any other partners involved, decide that the LPO musician or animateur should be permitted to take part in a particular project without a DBS check. This is entirely a matter for the discretion of the Education & Community Director and any other partners involved in the project. Where an LPO musician or animateur without an enhanced DBS check is permitted to take part in a project, their work with children or adults at risk must be supervised at all times by a member of LPO staff with an enhanced DBS check. The LPO will also ask the artist to complete a temporary Personal Disclosure form to self-declare any relevant convictions.

LPO staff, musicians and animateurs must not engage in “regulated activity” without an appropriate DBS-checked staff member unless they have undergone an enhanced DBS check with a barred list check.

The LPO Education & Community Project Manager will log any instances of players/animateurs engaged for ‘regulated activity’ where a DBS check has not been undertaken, and this will form part of the annual Safeguarding review/report for the Board.

Assessing information disclosed as a result of a DBS check

In the event of a DBS check disclosing information relevant to the individual’s suitability to work with children or adults at risk, the certificate information will be retained until a decision regarding the individual’s suitability to work with children or adults at risk has been determined. Responsibility for decisions concerning an individual’s suitability to work with children or adults at risk rests with the LPO Education & Community Director, who may consult with the Chief Executive.

The LPO’s policy in relation to the storage and retention of information relating to DBS checks is set out at Appendix 3.

9. Allegations of safeguarding concerns within the organisation

If anyone has safeguarding concerns relating to the behavior or actions of an LPO staff member, musician, freelancer, volunteer or other person working for the LPO, efforts will be made to investigate and establish facts and evidence, which will be properly recorded. See the LPO’s **Whistleblowing Policy** for further details of reporting concerns that are broader than safeguarding issues.

If the investigation upholds concerns, it is the LPO’s legal duty to report to the DBS if the following two conditions are met:

- The LPO has withdrawn permission for the staff member/musician/freelancer/volunteer/other worker to engage in regulated activity with children and/or adults at risk. Or that person has been moved to another area of work that isn’t regulated activity. This includes situations where the person was redeployed, resigned, retired or left.
- It is suspected that the person has carried out one of the following:
 - engaged in relevant conduct* in relation to children and/or adults at risk. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or;

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- satisfied the harm test in relation to children and / or vulnerable adults. E.g. there has been no relevant conduct but a risk of harm to a child or vulnerable still exists, or;
- has been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

* Relevant conduct is conduct that:

- endangers or is likely to endanger a child or adult at risk
- if repeated against or in relation to a child/adult at risk would endanger them or be likely to endanger the child or adult at risk
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a child or adult at risk

A person's conduct endangers a child or adult at risk if they:

- harm the person
- cause the person to be harmed
- put the person at risk of harm
- attempt to harm the person
- incite another to harm the person

If it is uncertain if these conditions are met, the DSO will call the DBS helpline.

Further information can be found on the DBS website: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

10. References

- HM Government: Statutory guidance for safeguarding children (2015, last updated 2023)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- HM Government: Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
[Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/information-sharing-advice-for-practitioners-providing-safeguarding-services-to-children-young-people-parents-and-carers-2018)
- The Care and Support Guidance (issued under the Care Act 2014), in particular Chapter 14 (Statutory guidance for safeguarding adults):
[Care and support statutory guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/care-and-support-statutory-guidance)
- London Safeguarding Children Procedures and Practice Guidance
 - For children: [London Safeguarding Children Procedures](https://www.londonadass.org.uk/~/media/Childrens-Safeguarding-Procedures-2019-2023)
 - For adults: [2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf](https://www.londonadass.org.uk/~/media/2019-04-23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf) (londonadass.org.uk)
- [NSPCC guidance on Safeguarding children and child protection](https://www.nspcc.org.uk/keeping-children-safe/child-protection/)

- NSPCC information about different types of child abuse and possible signs and symptoms:
<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>
- Disclosures and Barring Service (DBS)
- LPO Whistleblowing Policy – available in Staff handbook or on request

11. Implications

- This policy will be made available to all LPO staff, as well as LPO musicians and amateurs undertaking project work with children and adults at risk.
- LPO staff, musicians and amateurs should receive regular training based on this policy, as well as thorough prior briefing in relation to every project involving children and adults at risk.
- A copy of this policy must be placed on the LPO website.
- This safeguarding policy is subject to annual review by the LPO Board. *The next date of review is February 2026.*

12. LPO Safeguarding roles and contacts

Designated Safeguarding Lead (DSL)

David Burke	Chief Executive	david.burke@lpo.org.uk
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Designated Safeguarding Officer (DSO):

Talia Lash	Education & Community Director	talia.lash@lpo.org.uk
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Trustee Safeguarding Lead:

David Buckley	https://lpo.org.uk/people/david-buckley/
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LPO Education & Community team:

Lowri Davies	Education & Community Project Manager	lowri.davies@lpo.org.uk
Ellie Jones	Education & Community Project Manager	eleanor.jones@lpo.org.uk
Hannah Smith	Education & Community Coordinator	hannah.smith@lpo.org.uk

APPENDIX 1

GOOD PRACTICE GUIDELINES CHILDREN ENGAGED TO PARTICIPATE IN LPO PERFORMANCES

YOUNG ARTISTS UNDER THE AGE OF 18 BOOKED TO PERFORM AS SOLOISTS WITH THE ORCHESTRA

- A designated member of the LPO Concerts team (or LPO Education & Community team for performances which fall within the Education & Community programme) will ensure that the agent is contractually obliged to provide a chaperone (who may be the agent, parent or other carer) for any young artist under the age of 18. The chaperone will be required to take responsibility for the welfare of the young artist at all times while the young artist is working with the LPO.
- The young artist will be allocated a private dressing room with en-suite facilities when rehearsing/performing at the Royal Festival Hall; the LPO will use its best endeavors to provide similar facilities when performing at other venues.
- LPO staff or visitors are not authorised to enter the young artist's dressing room unless the chaperone is present to authorise the admission of visitors.
- The management of the LPO performance or rehearsal venues are to be informed of the above requirements when a young artists is contracted to perform with the LPO.

CHOIRS AND ENSEMBLES OF MUSICIANS UNDER THE AGE OF 18

- The designated member of the LPO Concerts/Education team will ensure that youth choirs or ensembles provide a suitable level of supervision to ensure the welfare of the young musicians.
- When performing with the LPO at the Royal Festival Hall, the young musicians will be allocated separate dressing room accommodation in the choir rooms or similar suitable alternative.
- The young musicians' management will be responsible for their welfare and supervision, including controlling access to dressing room accommodation whilst the young musicians are in occupation.

In each case, the relevant LPO department will liaise with the relevant local authority department to determine whether a child performance license or Body of Persons Application is required. The LPO acknowledges that it is the responsibility of the Orchestra to apply for any performance licenses required for concerts which are self-promoted, or where the Orchestra is engaging the artists.

APPENDIX 2

FOYLE FUTURE FIRSTS, YOUNG COMPOSERS AND CONDUCTING FELLOWSHIP SCHEMES

The London Philharmonic Orchestra runs three highly regarded schemes for emerging artists, the Foyle Future Firsts, Young Composers and Conducting Fellowship schemes. These schemes are aimed at early-career professional musicians.

Although the participants in these programmes are over the age of 18, the LPO has a duty of care towards them and LPO mentors are therefore in a position of a trust in relation to participants. LPO mentors must ensure that their conduct towards participants is professional at all times, and that they do not behave in a way that could be regarded as a breach of that position of trust or could bring the LPO into disrepute. In particular LPO mentors should not engage in sexual activity with participants nor do anything that could be regarded as seeking to prepare a participant for sexual activity in the future.

APPENDIX 3

LPO POLICY ON THE STORAGE AND RETENTION OF INFORMATION RELATING TO DBS CHECKS

All information held in connection with this policy will be held and processed lawfully in accordance with the 2018 General Data Protection Regulation. Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Information received in connection with DBS checks is treated as sensitive personal data and is treated as confidential with access limited only to those members of staff who require it. In most cases this is limited to the LPO Education & Community team, designated members of the LPO's Concerts team and the Chief Executive.

All DBS check information will be stored electronically on a spreadsheet only accessed by staff members with satisfactory DBS checks themselves. ID documentation required to process a check is not retained by the LPO. If a DBS check is 'clear', the only information retained will be the date of the check, the reference number and the fact that it was 'clear'.

In the event of a DBS check disclosing information relevant to the individual's suitability to work with children or adults at risk, the certificate information will be retained until a decision regarding the individual's suitability to work with children or adults at risk has been determined. Responsibility for decisions concerning an individual's suitability to work with children or adults at risk rests with the LPO Education & Community Director (with the Chief Executive if necessary). The certificate information will then be held for a further period of up to six months to allow for the resolution of any disputes after which the certificate information will be securely destroyed. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, the LPO will consult the DBS about this and will give full consideration to the provisions of the Data Protection Act and the human rights of the individual before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

The LPO will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a DBS certificate after the six month retention period has elapsed. However, we may keep a record of the date of issue of a certificate (or the date of any online check undertaken via the DBS Update Service), the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

Sharing with third parties

The LPO will not share DBS certificate information with third parties other than to confirm that a DBS check has been carried out and that the individual concerned has been cleared to work with children or adults at risk. In particular LPO will not inform a third party whether or not a check was 'clear'.