Responding to Allegations of Improper Conduct

1. Purpose

This procedure outlines the steps to be taken when a musician, performer, DJ, touring crew member, or associated representative is accused of improper conduct before, during, or after an event connected to The Pump.

The procedure aims to:

- Protect the safety and wellbeing of staff, audiences, and artists
- Ensure concerns are handled consistently and professionally
- Reduce legal and reputational risk
- Support fair and proportionate decision-making
- Preserve evidence and documentation where appropriate

This procedure does not determine criminal guilt or innocence. The Pump is not a law enforcement body, but may take operational decisions to protect safety and The Pump's interests.

2. Scope of Allegations

This procedure may apply to allegations including:

- Harassment
- Sexual misconduct
- Assault or violence
- Hate speech or discriminatory conduct
- Safeguarding concerns involving minors or vulnerable persons
- Coercive or abusive behaviour

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- Threats or intimidation
- Serious breaches of The Pump conduct policies
- Conduct likely to create significant safety or reputational risk

Allegations may arise:

- On The Pump premises
- Online or via social media
- At another venue or event
- Through media reporting
- Via direct complaint to The Pump staff ● Through law enforcement or third parties

3. Immediate Safety Assessment

Upon receiving an allegation, the senior staff member on duty must immediately assess:

- Is anyone currently at risk?
- Does anyone require medical assistance?
- Is there an immediate safeguarding concern?
- Is security intervention required?
- Is police involvement necessary?
- Is the accused person currently on site?

Where immediate risk exists, The Pump staff should prioritise safety over performance continuity.

Possible immediate actions include:

- Separating individuals involved
- Providing a safe private space for the reporting person
- Contacting emergency services
- Removing individuals from public areas
- Suspending backstage access
- Halting a performance where necessary

4. Receiving Complaints

Upon receiving complaints at any point, The Pump staff will:

- Remain calm and professional
- Listen without judgement
- Avoid making promises about outcomes

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- Avoid expressing conclusions about guilt or innocence
- Record factual information only
- Ask what immediate support the reporting person needs
- Escalate promptly to The Pump management

The Pump's staff will not:

- Conduct aggressive questioning
- Attempt to investigate criminal matters independently
- Share allegations widely among staff or the public ● Post or comment publicly on the matter

5. Documentation

A written incident record should be created as soon as possible, including:

- Date and time
- Names of involved persons (where known)
- Nature of allegation
- Source of information
- Witnesses
- Immediate actions taken
- Staff involved
- Any supporting materials provided

Where possible, preserve:

- CCTV footage
- Emails or messages
- Incident reports
- Security logs
- Ticketing records

Documentation should remain confidential and securely stored.

6. Internal Risk Assessment

The Pump management should conduct a proportionate risk assessment considering:

6.1 Safety Risks

Potential risk to audiences or staff

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  Likelihood of escalation
  Vulnerable persons potentially affected
  Threats of violence or disorder

6.2 Operational Risks

- Security implications
- Impact on event delivery
- Staff willingness to work the event
- Potential protests or disruption

6.3 Reputational Risks

- Credibility and seriousness of allegations
- Public visibility
- Media attention
- Impact on The Pump’s partnerships and community trust

6.4 Legal Risks

- Defamation concerns
- Contractual obligations
- Licensing implications
- Employment or safeguarding duties

7. Interim Measures

Pending further information, the The Pump may implement temporary measures including:

- Increased security
- Restricted backstage access
- Additional safeguarding controls
- Monitoring during events
- Suspension of hospitality privileges
- Temporary hold on future bookings
- Postponement or cancellation of performances

Interim actions are precautionary operational decisions and do not imply guilt.

8. Decision-Making Framework

The Pump management should make decisions proportionately based on available information. If a decision is taken at senior management level then The Pump's directors must be informed in writing. If there is uncertainty about the correct course of action, then the decision must be made by The Pump's directors.

Possible outcomes include:

A. No Further Action

Appropriate where:

- Complainant retracts their accusation
- Risks are assessed as extremely low

B. Conditional Engagement

The Pump may proceed with an event if risks are assessed as low. Potential mitigation may be:

- Increased security
- No backstage access

C. Suspension or Cancellation

The Pump will cancel a performance or event if:

- Credible safeguarding concerns exist
- Police investigations are active, or
- Safety or reputation may be materially harmed

9. Communications

9.1 Internal Communications

Information should be shared strictly on a need-to-know basis.

Staff should be instructed not to speculate publicly or online.

9.2 External Communications

The Pump will only make a statement if it is deemed necessary. The Pump will be wary of any increased danger we may put a complainant in by making an external statement. In this instance, any statements will be attributed to The Pump's directors *only*..
Public statements should:

- Avoid defamatory language
- Avoid assumptions of guilt
- Be factual and limited in scope ● Emphasise safety and policy obligations

10. Police & External Authorities

The Pump should cooperate appropriately with:

- Police investigations
- Licensing authorities
- Safeguarding agencies
- Legal advisors
- Insurance providers where relevant

The Pump staff should not obstruct investigations or attempt independent forensic inquiries.

11. Confidentiality

Allegations and reports should be handled confidentially wherever possible.

Confidentiality may be limited where:

- Safeguarding duties arise
- Criminal conduct is alleged
- Legal obligations require disclosure ● Immediate safety concerns exist

12. Review & Follow-Up

Following resolution of an incident, The Pump management should review:

- Adequacy of response
- Staff handling procedures
- Security arrangements
- Policy effectiveness

- Training needs
- Future booking decisions

13. Record Retention

Incident records should be securely retained in accordance with:

- Applicable data protection laws
- Insurance requirements
- Legal advice
- The Pump’s retention policies