Young People and Adults at Risk Safeguarding Policy

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<tr>
<th>Date approved by Trustees</th>
<th>31/07/2019</th>
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<tr>
<td>Date for next review</td>
<td>July 2020</td>
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<tr>
<td>Compliance lead</td>
<td>Trustee with responsibility for Safeguarding</td>
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<tr>
<td>Agreed Policy file name</td>
<td>Safeguarding Policy and Procedure</td>
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<tr>
<td>Agreed policy location:</td>
<td>RMT website (<a href="http://www.rmt.org">www.rmt.org</a> - public access) and RMT Information area\Policies and Procedures</td>
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The Ruskin Mill Trust group (RMT) provides an innovative and experiential education and residential provision for children and young adults aged 8 to 25 years with complex learning needs and also a provision in Darlington which supports adults from age 18. Within the Colleges and Schools these young people are known as ‘students’ and will hereafter be referred to collectively as students.

1. Policy Aims, Statement and Principles

1.1 Aims

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities;
- To identify children and adults at risk who are suffering or likely to suffer harm or abuse and act to protect them;
- To work with relevant services and agencies to ensure that children and adults at risk are protected from harm;
- To ensure that RMT adheres to safer recruitment guidance and legislation, deals promptly with allegations of abuse against staff and takes bullying and harassment seriously;
- To ensure consistent good practice;
- To train staff effectively in all safeguarding issues and in their responsibilities for identifying and protecting students that maybe at risk of harm;
- To maintain a robust recording system for any safeguarding concern and the storage of information;
- To recognise that all children may be vulnerable to abuse, but to be aware that some children and adults at risk may have increased vulnerabilities due to special educational needs or disabilities;
- To demonstrate RMT commitment with regard to safeguarding and child protection to students, parents, carers and other partners;
- To ensure staff and volunteers adhere to the RMT Code of Conduct for Staff which sets out RMT’s vision, values and culture and how people in RMT should behave;
- To ensure that everyone in RMT understands the safeguarding procedures and to regularly review policies and procedures to ensure that students are protected to the best of our ability;
In relation to female genital mutilation (FGM), to work as part of a multi-agency group to support those affected, including social care agencies and the police;

To recognise that Peer on Peer abuse may take place, never tolerate or pass this off as ‘banter’ or ‘part of growing up’ and otherwise do all things possible to prevent such abuse through education and the use of appropriate sanctions;

To contribute to RMT safeguarding portfolio;

To provide a learning environment that is safe and secure; and

To teach students how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm.

This policy adheres to the following documents:

- Keeping Children Safe in Education (September 2018)
- Working together to Safeguarding Children (June 2018)
- Guidance for Safer Working Practise for those working with Children and Young People in Education Settings (2015)
- What to do if you are worried a child is being abused: advice for practitioners (2015)

There are a number of other documents (statutory and non-statutory) that inform our policy and practice. A list of these can be found in Annex A of Keeping Children safe in Education (September 2018)

1.2 Statement

The Ruskin Mill Trust group (RMT) acknowledges that it has a statutory and moral duty of care to safeguard and promote the welfare of children, young people and adults at risk of harm and is fully committed to ensuring safeguarding practice reflects statutory responsibilities and government guidance.

Throughout the policy and procedures, reference is made to ‘young people’. This term is used to mean everyone under the age of 18. Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children’s health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes (Keeping Children Safe in Education. DfE 2018).

Reference is also made to ‘adult at risk’. An adult at risk of harm is a person aged 18 years or over who is, or may be, in need of community care services by reason of mental health or other disability, age or illness and who are unable to take care of themselves or protect themselves against significant harm or exploitation. (No Secrets, Department of Health, March 2000) Some students of RMT are students aged 18 and above and are considered to be “an adult with care and support needs” which is defined in the Care Act 2014 as: a person who has needs for care and support, is experiencing, or is at risk of, abuse, neglect; and, as a result of those care and support needs, is unable to protect themselves from either the risk of or the
experience of abuse or neglect. (Care Act 2014)

RMT acknowledges that students with special educational needs and disabilities (SEN) can face additional safeguarding challenges and be particularly vulnerable to abuse and it accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.

RMT is committed to maintain procedures and practices which safeguard and promote the welfare of all students and staff by ensuring the safeguarding policy meets the Department for Education’s statutory guidance for colleges. (Keeping Children Safe in Education. DfE 2018)

Due to their day-to-day contact with students, RMT staff are uniquely placed to observe changes in behaviour and the outward signs of abuse, neglect, exploitation and radicalisation. Young people or adults at risk may also turn to a trusted adult within RMT when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse, are approachable and trusted by students, listen actively to students and understand the procedures for reporting their concerns. RMT will act on identified concerns and will provide early help to prevent concerns from escalating.

1.3 Principals

- The responsibility to safeguard and promote the welfare of its students is of paramount importance to RMT.
- All students, under the 9 protected characteristics of the Equality Act 2010, have equal rights to protection.
- All staff have responsibility to provide a safe environment in which young people and adults at risk can learn.
- RMT is committed to safeguarding and promoting the welfare of young people and adults at risk and expects all staff and volunteers to share this commitment.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person or adult at risk of harm at home, in the community or within RMT.
- All RMT staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to young people and adults at risk.
- All RMT staff should be prepared to identify learners who may benefit from early help by providing support as soon as a problem emerges and ensuring risk assessments are in place for all learners deemed at risk.
- Any staff member who has a concern that there is a risk of immediate serious harm to a young person or adult at risk must instantly work with the Designated Safeguarding Lead to ensure a referral will be made immediately to Children’s or Adult Social Care at the relevant Local Authority.
- All staff must ensure that detailed accurate records of all safeguarding concerns are logged and maintained on the RMT Databridge system or equivalent. All records and paper based information will be securely stored. Students and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed annually unless an incident; new legislation or guidance suggests the need for an interim review.
• All volunteers, contractors, stakeholders, partners working with or for RMT will be required to operate within the ethos and parameters of the safeguarding policy and its procedures.
• Failure to comply with the safeguarding policy and procedures will be addressed without delay through the staff disciplinary policy.
• The board of trustees will ratify and ensure that RMT has a safeguarding policy and procedure in place.
• This policy is available on RMT website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work with RMT.

1.4 SCOPE
This policy applies to:
• all teaching, non-teaching, support, supply, contract staff, governors, volunteers and trustees working in or on behalf of RMT. All references in this document to ‘staff or members of staff’ should be interpreted as relating to the aforementioned unless otherwise stated.
• all colleges, schools and other educational and care provisions within the RMT group and specifically Ruskin Mill Trust Limited and its subsidiary companies: Transform Residential Limited, Clervaux Trust Limited, Clervaux Garden School, Brantwood Specialist School Limited, Sunfield Children’s Homes Limited, Catherine Grace Trust, Seoul Trust and any other subsidiary that may be acquired in the future.

2. Roles and Responsibilities

Designated staff with responsibility for safeguarding

<table>
<thead>
<tr>
<th>Provision Lead</th>
<th>Alex Griffin, Principal</th>
</tr>
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<tbody>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Mike Claridge, Designated Safeguarding Lead</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Jo Chapman, Student Engagement Manager</td>
</tr>
<tr>
<td>Contact</td>
<td>0121 633 1270</td>
</tr>
<tr>
<td>Out of Hours</td>
<td>07977 174790</td>
</tr>
<tr>
<td>LADO</td>
<td>0121 675 1669</td>
</tr>
<tr>
<td>Local authority Designated Officer</td>
<td><a href="mailto:Lado.secure@birmingham.gcsx.gov.uk">Lado.secure@birmingham.gcsx.gov.uk</a></td>
</tr>
<tr>
<td>Designated Lead for Looked After Children</td>
<td>Zoe Higgins and Cassie Jones</td>
</tr>
<tr>
<td>Local Safeguarding Children’s Board</td>
<td>0121 303 1888 or 0121 675 4806</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.lscbbirmingham.org.uk/index.php">http://www.lscbbirmingham.org.uk/index.php</a></td>
</tr>
<tr>
<td>Local Safeguarding Adults Board</td>
<td>0121 303 1234 or 0121 464 9001</td>
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### Brantwood Specialist School

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
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</thead>
<tbody>
<tr>
<td>Provision Lead</td>
<td>Eric Knutsen, Head Teacher</td>
</tr>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Adam Leathwood, Safeguarding Manager</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Marc Hughes, Deputy Head teacher Digby Brown, Learning Engagement Manager Deborah Dawson, Head of Care Tom Linley-Shaw</td>
</tr>
<tr>
<td>Contact Out of Hours</td>
<td>0114 258 9062 07812 234349</td>
</tr>
<tr>
<td>LADO Local authority Designated Officer</td>
<td>0114 2736870 <a href="mailto:lado@sheffield.gcsx.gov.uk">lado@sheffield.gcsx.gov.uk</a></td>
</tr>
<tr>
<td>Designated Lead for Looked After Children</td>
<td>Louise Smith, Teacher</td>
</tr>
<tr>
<td>Local Safeguarding Childrens Board</td>
<td>0114 273 4855 <a href="https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-and-resources/referringa-safeguarding-concern-to-childrenssocialcare">link</a></td>
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<tr>
<td>Sheffield Safeguarding Adults Board</td>
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### Clervaux

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<tbody>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Adam Leathwood, Safeguarding Manager</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Emma Hickmans Lone Helliwell</td>
</tr>
<tr>
<td>Contact Out of Hours</td>
<td>01325 729862 07901 931464</td>
</tr>
<tr>
<td>Designated Lead for Looked After Children</td>
<td>Gavin Copeland</td>
</tr>
<tr>
<td>LADO Local Authority Designated Officer</td>
<td>01325 406459 <a href="mailto:LSCB@darlington.gcsx.gov.uk">LSCB@darlington.gcsx.gov.uk</a></td>
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<tr>
<td>Local Safeguarding Children’s Board</td>
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<tr>
<td>Local Safeguarding Adults</td>
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<tr>
<th>Position</th>
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<tbody>
<tr>
<td>Provision Lead</td>
<td>Brad Challinor, Principal</td>
</tr>
<tr>
<td>Designated Senior Person for safeguarding</td>
<td>Brad Challinor</td>
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<tr>
<td>Deputy DSP</td>
<td>Louise Lewis, Head of Residential</td>
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<td>Llywelyn Rees, Deputy Principal</td>
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<tr>
<td>Designated Lead for Looked After Children</td>
<td>Christine Mathias</td>
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### Freeman College

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<tbody>
<tr>
<td>Provision Lead</td>
<td>Angie Iverson</td>
</tr>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Adam Leathwood, Safeguarding Manager</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Angie Iversen, Sharon Allen, Ewan Keefe</td>
</tr>
<tr>
<td>Designated Lead for Looked After Children</td>
<td>Ashley Blackwell</td>
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<tr>
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<tr>
<td></td>
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### Glasshouse College

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<tr>
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<th>Alex Griffin, Principal</th>
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<tbody>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Mike Claridge, Safeguarding Manager</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Agata Dokszewicz, Head of Residential Manager Jack Nordhoff, Learning Engagement Manager Lindsay Gregg, Shared Lives Co-ordinator</td>
</tr>
<tr>
<td>Contact</td>
<td>01384 399400</td>
</tr>
<tr>
<td>Out of hours</td>
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</tr>
<tr>
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</tr>
<tr>
<td>LADO</td>
<td>01384 816822</td>
</tr>
<tr>
<td>Local Authority Designated Officer</td>
<td><a href="mailto:allegations@dudley.gcsx.gov.uk">allegations@dudley.gcsx.gov.uk</a></td>
</tr>
<tr>
<td>Dudley Safeguarding Childrens Team</td>
<td>0300 555 0500</td>
</tr>
<tr>
<td>Dudley Safeguarding Adults Team</td>
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### Ruskin Mill College

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<thead>
<tr>
<th>Provision Lead</th>
<th>Grainne O’reilly, Principal</th>
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<tbody>
<tr>
<td>Designated Safeguarding Lead</td>
<td>David Wragg, Safeguarding Manager</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Brendan Murphy, Head of Residential Steven Ferguson, Deputy Principal Ab De Bree, shared Lives Co-ordinator</td>
</tr>
<tr>
<td>Contact</td>
<td>01453 837500</td>
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<tr>
<td>Out of hours</td>
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<tr>
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<td>01452 426994</td>
</tr>
<tr>
<td>Local Authority Designated Officer</td>
<td><a href="mailto:nigel.hatten@gloucestershire.gov.uk">nigel.hatten@gloucestershire.gov.uk</a></td>
</tr>
<tr>
<td>Gloucester Safeguarding Children’s Team</td>
<td>01452 426525</td>
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### Sunfield Children’s Home

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<tr>
<th>Provision Lead</th>
<th>Tara Gratton / Oliver Cheney</th>
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<tbody>
<tr>
<td>Designated Safeguarding Lead</td>
<td>Lottie Riggs, Designated Safeguarding Lead</td>
</tr>
<tr>
<td>Deputy Safeguarding Lead</td>
<td>Sarah Marshall, Head of Care and Therapies, David Lyon, Head of Education, Zoe Swords, Teacher, Tim O’Brien, Assistant Home Manager</td>
</tr>
<tr>
<td>Contact</td>
<td></td>
</tr>
<tr>
<td>Out of hours</td>
<td>01562 882253</td>
</tr>
<tr>
<td></td>
<td>07775 558961</td>
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<tr>
<td>Designated Lead for Looked After Children</td>
<td>David Lyon Head of Education</td>
</tr>
<tr>
<td>LADO</td>
<td>01905 846221</td>
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<tr>
<td>Local Authority</td>
<td><a href="mailto:lado@worcestershire.gcsx.gov.uk">lado@worcestershire.gcsx.gov.uk</a></td>
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<td>Designated Officer</td>
<td></td>
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<tr>
<td>Worcester Safeguarding</td>
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<tr>
<td>Childrens Board</td>
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### 2.1 DESIGNATED SAFEGUARDING LEADS

Each of the schools, colleges and other provision operated by RMT has its own Designated Safeguarding Lead (DSL) and at least one Designated Safeguarding Deputy (DSD). Names and contact arrangements for the DSL and DSDs of all RMT provisions are set out above, together with links to the Local Children and Adult Safeguarding Boards of the area where the provision is located. This policy is aligned to the safeguarding policies of those Local Children and Adult Safeguarding Boards.

### 2.2 Designated Safeguarding Leads (DSL) responsibilities

Each nominated Designated Safeguarding Lead:

- Has the status and authority within RMT to carry out the duties of the post, including committing resources and supporting and directing other staff;
- Takes lead responsibility for safeguarding and child protection across their respective provision(s) and will only delegate any activities of the DSL to appropriately trained deputies. The role and responsibilities is explicit in the role holder’s job description.
- Is appropriately trained, receives refresher training at two-yearly intervals and
regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role;

- Is alert to the specific needs of young people and adults at risk, those with special educational needs, looked after young people and young carers;
- Has an understanding of the Common Assessment Framework process to ensure effective assessment and understanding of young people’s additional needs in order to inform appropriate provision of early help and intervention;
- Has an understanding of the early help process to ensure effective assessment and understanding of young people’s additional needs.
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraph 9-52 (pages 15) and Annex A of ‘Keeping Children Safe in Education DfE 2018’ (pages 75-87) and ensures that all staff within their provision(s) receive necessary training, information and guidance.
- Makes referrals to the Channel programme where there is a radicalisation concern and or support any staff who make a referral to Channel;
- Supports their provision(s) with regards to RMT’s responsibilities under the Prevent duty and provides advice and support on protecting children and adults at risk from radicalisation;
- Refers cases of suspected abuse to Social Care and/or the Police, as appropriate.
- Is available during school or college hours for staff to discuss any safeguarding concerns or otherwise ensures that a deputy will be available;
- Ensures that RMT holds more than one emergency contact number for every student.
- Ensures all staff within their provision(s) have read and understood part 1 and Annex A of Keeping Children Safe in Education (September 2018);
- Ensures that all staff within their provision(s) sign to indicate that they have read and understood the Young People and Adults at Risk Safeguarding Policy and the RMT Code of Conduct for Staff;
- Updates their knowledge and skills regularly and keep up with developments to their role;
- Provides staff across RMT with the knowledge, skills and support required to safeguarding children and adults at risk;
- Refers cases where a person is dismissed or has left RMT due to risk/harm to a student to the Disclosure and Barring Service, as required.
- Takes responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Keeps a record of staff attendance at safeguarding training;
- Makes the Young People and Adults at Risk Safeguarding Policy available publically, i.e, on the RMT website or by other means;
- Notifies Children or Adult Social care if a young person with a child protection plan or an adult has a sustained period of absence without explanation;
- Attends or ensures an appropriate representative attends any multi-agency safeguarding or child protection meeting;
- Develops effective links with relevant statutory and voluntary agencies including the local safeguarding partnerships;
- Ensures that, when a student leaves RMT, all safeguarding records are passed to the new education/residential setting where applicable and obtains confirmation of receipt and, if the young person or adult at risk is the subject of an open case to Children’s or Adult Social Care, their social worker is also informed;
- Works closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure young people and adults at risk with additional vulnerabilities are safeguarded;
- Ensures that staff are supported in recognition of the stressful and traumatic nature of safeguarding;
- Promotes a ‘culture of safeguarding’ in which every member of RMT acts in the best
interest of the young person

- Meets regularly with the safeguarding link Trustee and Trust Head of Safeguarding to review safeguarding policies and procedures across RMT and evaluate safeguarding training;
- Provides an annual report to the Board of Trustees setting out how RMT has discharged its safeguarding duties;
- Ensures that the Provision Leader (of specific provisions) and Trust Head of Safeguarding are made aware under ‘Working Together 2018’ of their obligation to refer all allegations that a student has been harmed or that a student may be at risk of harm from a member of staff or volunteer to the designated Officer in the Local Authority within one working day prior to any internal investigation; and
- Ensures that the Young People and Adults at Risk safeguarding policy and procedures are regularly reviewed and updated annually.

Further details on the role of the Designated Safeguarding Lead can be found in annex B of Keeping Children Safe in Education (September 2018).

2.3 Deputy Designated Safeguarding Lead responsibility

Every Deputy Designated Safeguarding Lead is appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, one deputy will be nominated as acting DSL and will assume all of the functions as detailed at 2.2 above.

The DSL or a deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone.

2.3 Trustee/Director responsibilities

The Boards of Trustees of each of Ruskin Mill Trust Limited, Brantwood Specialist School, Sunfield Children’s Home Limited, Transform Residential Limited, Clervaux Trust Limited, Catherine Grace Trust and Seol Trust are aware of and adhere to the guidance issued by the Charity Commission in respect of good safeguarding governance. In particular, each of the Boards of Trustees seek to fulfil the following 10 key actions:-

1. Ensure RMT has an adequate safeguarding policy, code of conduct and other safeguarding procedures and regularly review and update these to ensure that they are fit for purpose.
2. Identify possible risks, including risks to RMT’s students or anyone else connected to RMT and any emerging risks on the horizon;
3. Consider how to develop and embed the safeguarding culture within RMT;
4. Ensure that everyone involved with RMT knows how to recognise, respond to, report and record a safeguarding concern;
5. Ensure all staff know how to raise a safeguarding concern;
6. Regularly evaluate any safeguarding training provided, ensuring it is current and relevant;
7. Review which posts within RMT can and must have a DBS check from the Disclosure and Barring Service;
8. Has a risk assessment process in place for job posts which do not qualify for a DBS check, but which still have contact with young people or adults at risk;
9. Periodically review RMT’s safeguarding policy and procedures, learning from any serious incident or ‘near miss’; and
10. Ensure that all appropriate checks and due diligence is carried out in any different geographical areas of operation.

One member of the Board of Trustees of Ruskin Mill Trust Limited takes special responsibility
for monitoring safeguarding across RMT. That Trustee works closely with the Trust Head of Safeguarding to ensure that RMT:

- Appoints DSLs across RMT who are members of the senior leadership team at each provision and who have undertaken training in inter-agency working, in addition to basic safeguarding training;
- Ensures that the DSL role is explicit in the role holder’s job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of all staff and volunteers;
- Ensures that the DSL or a deputy DSL is always available during normal working hours for staff to discuss any safeguarding concerns;
- Ensures that the DSL or a deputy DSL is always available at least via telephone or other media during any out of hours/out of term;
- Has a safeguarding policy and procedures, including a staff code of conduct, that are consistent with statutory requirements, reviewed annually and made available publicly on the RMT website or by other means;
- Has procedures for dealing with allegations of abuse made against members of staff and volunteers, including allegations made against a Provision Leader and allegations against other learners;
- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with young people and adults at risk;
- Develops an induction strategy that ensures all staff, including Executive Team members, Central Services, all Provision Leaders and volunteers receive information about their relevant provision’s safeguarding arrangements, the RMT Code of Conduct for Staff and the role of the DSL on induction.
- Develops a training strategy that ensures all staff, including Executive Team members, Central Services, all Provision Leaders and volunteers receive appropriate and regularly updated safeguarding training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard effectively and this training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL’s duties above;
- Ensures that all staff, including temporary staff and volunteers, are provided with copies of or access to the Young People and Adults at Risk Safeguarding Policy and the RMT Code of Conduct for Staff before they start work at RMT;
- Appoints a designated lead(s) to promote the educational achievement of learners who are looked after by the Local Authority;
- Teaches students about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.
- Reports and/or refers all incidents or allegations appropriately, including where relevant, sending a serious incident report to the Charity Commission.

The nominated Trustee for Safeguarding will liaise with relevant external authorities should an allegation be made about any of the Trustees/Directors, a Provision Leader or a DSL/Deputy DSL.

Each Board of Trustees will receive an annual cross-trust report on safeguarding.

### 2.4 Executive Team and Regional Director responsibilities

The three Regional Directors are responsible for holding Provision Leaders to account against their responsibilities set out at 2.5 below. Each Regional Director shall identify best practice from within their regional area and ensure this is shared and embedded across RMT.

One Regional Director shall provide trust-wide leadership for safeguarding and report to the Executive Team weekly on any significant safeguarding incidents arising.
2.4.1 Trust Head of Safeguarding

Laura Davies Trust Head of Safeguarding has responsibility for Safeguarding and Prevent across the Trust, providing strategic leadership and ensuring collaborative working practice and quality. This includes ensuring that all statutory regulations and performance requirements relating to Safeguarding and Prevent are fully met and agreed at Executive and or Trustee level.

Laura.davies@rmt.org

2.5 Provision Leader responsibilities

- Ensures that the Young People and Adults at Risk Safeguarding Policy and procedures are understood and implemented by all staff at their provision;
- Allocates sufficient time, training, support and resources, including cover arrangements when necessary to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- Supports the Designated Lead for looked after young people to promote the educational achievement of any learner who is looked after by the Local authority and have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England and Wales;
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- Ensures that students are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum;
- Ensures that anyone who has harmed or may pose a risk of harm is referred to the Disclosure and Barring Service, as advised by the Designated Officer;
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers;
- Where applicable safeguards children’s wellbeing and maintains public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- Ensures close and effective partnership working with Local Authority Safeguarding and Social Care teams, Care Quality Commission or the Care and Social Services Inspectorate Wales and Police;
- Ensures that young people and adults social care have access to RMT to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2018);
- Ensure that all recruitment follows the ‘Safer Recruitment’ guidance and a single central record is maintained with details of all members of staff who are in contact with students;
- Respond to allegations of abuse against all other members of staff.

2.5 Role and Responsibilities of all staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children and adults at risk. All staff across RMT:

- Have a responsibility to provide a safe environment, where young people and
adults can learn;
- Should know what to do if a student tells them that he/she is being abused or neglected;
- Will be able to identify indicators of abuse;
- Will be made aware of: the Young People and Adults at Risk Safeguarding Policy, behaviour policy; the RMT Code of Conduct for Staff; information about the safeguarding response to children missing in education; the role of the designated lead and all systems within RMT that support safeguarding;
- Will be provided with a copy of Part 1 of keeping Children Safe in Education (September 2018) annually and receive annually updated training on their safeguarding roles and responsibilities;
- Should know what to do if a student makes a disclosure of abuse and never promise confidentiality when a disclosure is made;
- Will be made aware of the early help process and understand their role in it;
- Should be prepared to identify students who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- May be required to support social workers and other agencies following a referral;
- Will be made aware of the process for making referrals to Children and Adults Social Care, understand statutory assessments and they role that they may be expected to play in such assessments;
- Should be prepared to make referrals if they have concerns about a child’s or adult at risk’s welfare and understand the role that they may be expected to play in such assessments;
- Will receive regularly updated safeguarding and Prevent training;
- Will receive safeguarding updates throughout the year as part of continuous professional development;
- Should be able to contribute to the development of Young People and Adults at Risk Safeguarding Policy and practice;
- Should always seek advice from the DSL if they are unsure and record actions on RMT’s Databridge or equivalent system;
- Who are teaching staff should safeguarding student wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards 2012).

3. Recognising Abuse

To ensure that all students are protected from harm, RMT needs to understand what types of behaviour constitute abuse and neglect. Abuse may be committed by adult men or women and by other young people. RMT recognises that abuse can take many different forms. Staff will receive training on the following issues and action will be taken if RMT believe that a student is at risk

Abuse is a form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm or by failing to act to prevent harm. Children or adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

3.1 Types of abuse:

- **Physical abuse:** a form of abuse which involves hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk.
- **Fabricated illness:** caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk. This used to be called Munchausen’s syndrome by proxy, but is now usually referred to as fabricated or induced illness.

- **Emotional abuse:** the persistent emotional maltreatment of a child or adult at risk such as to cause severe and adverse effects on the student’s emotional development. It may involve conveying to the student that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the student opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations. These may include interactions beyond their development capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing the student to frequently feel frightened or in danger, or the exploitation or corruption of the student. Some level of emotional abuse is involved in all types of maltreatment of a student, although it may occur alone.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

- **Neglect:** this is the persistent failure to meet a student’s basic physical and/or psychological needs, likely to result in the serious impairment of the student’s health or development. Neglect may occur during pregnancy as a result of a maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a student from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a student’s basic emotional needs.

- **Female Genital Mutilation (FGM):** is any procedure which involves partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

- **Honour based violence:** is a crime or incident, which may have been committed to defend or protect the honour of a family or community.

- **Faith Based Abuse:** psychological manipulation and harm inflicted on a person by using the teachings of their religion. This is perpetrated by members of the same or similar faith and includes position of authority within the religion.
- **Forced Marriage:** Where one or both people do not consent to the marriage and pressure or abuse is used.

- **Child sexual exploitation:** Child sexual exploitation is a type of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- **Online abuse:** This is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

- **Peer on Peer abuse:** this is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence & sexual harassment, gender based violence/sexual assaults, sexting, teen partner abuse, initiation/hazing type violence/rituals.

- **Bullying and cyberbullying:** Bullying can happen anywhere - at school, at home or online. It’s usually repeated over a long period of time and can hurt a child or adult at risk both physically and emotionally.

- **Domestic abuse:** Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

- **County Lines / Criminal Exploitation:** As set out in the ‘Serious Violence Strategy’ published by the Home Office in 2018, this is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs within the UK using dedicated mobile phone lines or other forms of communication. They are likely to exploit children and adults at risk to move and store drugs and money, they will often use cohesion, intimidation, violence (including sexual violence and weapons).

- **Trafficking / Modern Slavery:** Trafficking is a type of abuse where children or adults at risk are recruited, moved or transported and then exploited, forced to work or sold.

- **Grooming:** Children and adults at risk can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional.

- **Harmful sexual behaviour:** Children and adults at risk who develop harmful sexual behaviour harm themselves and others.

- **Gang or youth violence:** An organization that claims control over territory in a community and engages, either individually or collectively in illegal and possibly violent behaviour.

- **Radicalisation:** A vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

- **Financial Abuse:** Which includes taking another person's money or possessions - for example, having money or property stolen, being pressured into giving people money or changing a will, misuse of benefits, not being allowed access to money.
Discriminating abuse: Discriminating abuse includes any type of abuse aimed at a child or adult at risk because of their colour, religion, appearance or sexuality. For example, ignoring spiritual or religious beliefs, comments or jokes about a person's disability, age, race, sexual orientation, or gender / gender identity, ignoring cultural needs, for example diet or clothing.

Organisational abuse: Not offering flexibility and choice for students, having poor standards of care, lack of inadequate procedures. Poor record keeping or lack of management overview and support. Insufficient staffing, abusive or disrespectful attitudes towards students, not offering choice or promoting independence, misuse of medication. Failure to respond to abuse properly.

Abuse of Individual Rights/discriminatory abuse/racial abuse: Abuse of individual rights is a violation of human and civil rights by any other person or persons. Discriminatory abuse consists of abusive or derisive attitudes or behaviour based on a person’s sex, sexuality, ethnic origin, race, culture, age, disability or any other discriminatory abuse - this includes hate crime. Forced marriage is also an abuse of human rights and falls within the definition of adult abuse.

RMT will also take action to protect:
- Children missing education; and
- Children missing from home or care.

3.2 Early Help and use of Early Help Assessment Process

RMT recognises that providing early help is more effective in promoting the welfare of young people than reacting later. Early help means providing support as soon as a problem emerges, at any point in a young person’s life. Keeping Children Safe in Education 2018 emphasises that all staff should be aware of the early help process and understand their role in it. All staff are therefore trained and required to notice any concerns about young people which may help to identify that they would benefit from early help; to record these concerns on Databridge (or equivalent RMT system); and share their concerns with the Designated Safeguarding Lead (or a deputy DSL).

RMT works closely with family hubs to work with families in the community to improve outcomes for young people.

4. Procedure for reporting Concerns about a Student

4.1 Four R’s model

RMT will adopt the four R’s model for dealing with concerns or disclosures regarding any student.

These are: Recognise, Respond, Refer, Record.

4.1.1 Recognise

A student may disclose sensitive information at any time of the day or night. It is therefore imperative that all staff are aware of the signs and behaviours which may
indicate abuse.

4.1.2 Respond

When receiving a disclosure from a student the member of staff must:

- Find time and, if necessary, a suitable place to listen to the student, when a disclosure is reported.
- Listen to what is being said without displaying shock or disbelief.
- Not make false promises which may not be fulfilled and not promise confidentiality.
- If the student asks that information is kept secret, it is important that the student is informed, in a manner appropriate to the students age/stage in development, that complete confidentiality cannot be promised.

4.1.3 Refer

When the DSL, or in their absence a Deputy DSL, has been informed, they will make the decision whether or not to refer the concern to social care or the police.

For referrals concerning students under 18 years of age, the DSL should use the Local Authority ‘Children’s Social Care threshold guidelines. If in doubt, the receiving team will determine whether a safeguarding enquiry is needed or if not, what other measures may need to be taken.

The initial contact service will be consulted when there is uncertainty about whether to refer. Referrals must be made as soon as possible and the appropriate forms completed and sent.

All referrals to external agencies should be followed up by RMT within 24 hours until a written response is received.

Dependent on which Local Authority a referral is made to a different process may need to be followed for students. If the disclosure/concern is related to events happening at RMT the DSL should follow its local guidance.

If the disclosure/concern relates to events happening outside RMT site (e.g home), the DSL should refer the concern to the ‘home’ local authority where the learner lives.

4.1.4 Record

Records that are factual, accurate and relevant and avoid subjective judgements using the Databridge (or equivalent) system should be made. It is not the responsibility of RMT to ‘check out’ what any student tells, nor should any abuser be questioned. All concerns for students should be recorded as soon as possible and within one hour using the Databridge (or equivalent) system.

4.2 Submitting referrals
All referrals relating to learners under 18 should be made to the Local Authority Children’s team / MASH.

All referrals relating to adults at risk should be made to the Local Authority Safeguarding Adults Team.

4.3 Staff reporting directly to external agencies

Staff should ordinarily follow the reporting procedures outlined in this policy. However, as emphasised in ‘Keeping Children Safe in Education DfE 2018’, any staff member can refer their concerns directly to Children’s / Adults Social Care and/or the Police if:

- the situation is an emergency and the DSL, the Deputy DSL, Head of Safeguarding, the Principal and/or the Nominated Trustee for Safeguarding and/or the Chair of Trustees are all unavailable;
- they are convinced that a direct report is the only way to ensure the learner’s safety; or
- for any other reason they make a judgement that a direct referral is in the best interests of the student.

In any of those circumstances, staff may make direct referrals and share information without being the subject of censure or disciplinary action. However, staff should inform the DSL at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the young person or adult at risk.

4.4 Position of trust

All adults working with young people and adults at risk of harm are in a position of trust in relation to these students. A relationship between a member of staff, volunteer or contractor and a student cannot be a relationship between equals. There is potential for exploitation and harm of the student, and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 may be a criminal offence, even if that student is over the age of consent. The RMT Code of Conduct for Staff sets out the expectations of staff and is signed by all staff members.

5 Procedure for Reporting Concerns about Staff, Volunteers or Visitors

5.1 Whistleblowing

All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and concerns will be taken seriously. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff conduct policies, are in place for such concerns to be raised. Further information and guidance is available in RMT’s ‘Whistleblowing Policy’.
Staff are expected to report all concerns about poor practice or possible abuse by colleagues to the DSL; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect young people and adults at risk and reduces the risk of serious abuse in College. Concerns or complaints about a Provision Leader should be reported to the Chair of Trustees. Staff may also report concerns about suspected abuse or neglect directly to Children’s /Adults Social Care or the Police if they believe direct reporting is necessary to secure action. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m. Monday to Friday or email help@nspcc.org.uk.

5.2 Allegations against staff

When an allegation is made against a member of staff, they have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Where a member of staff or volunteer feels that there are poor or unsafe practice and potential failures in the provision then they should raise them with the Provision Leader.

If, however, they feel that their concerns have not been addressed then they should raise them with the Executive Team member/Regional Director with responsibility for safeguarding and utilise RMT’s Whistleblowing policy.

A member of staff who receives an allegation about another member of staff from a young person or adult at risk of harm will follow the guidelines in section 4 for dealing with disclosure.

Allegations against a staff member will be assessed by the Head of Safeguarding and the relevant HR Manager. In order to assess the allegations against a member of staff, it will be judged against the relevant criteria highlighted below. This applies to all cases in which it is alleged that an individual who works or volunteers with young people or adults at risk of harm has:

- Behaved in a way that has harmed a young person or may have harmed a child or adult at risk;
- Possibly committed a criminal offence against or related to a young person; or
- Behaved towards a young person in a way that indicates they may pose a risk of harm to young people or an adult at risk.

The Head of Safeguarding or relevant HR Manager will inform the LADO within 1 working day of receiving the allegation, if the case meets the relevant criteria. Where the cases may not appear to meet the relevant criteria fully but still gives rise to concerns about the risk an individual poses to young people through their work, RMT will seek advice from the (LADO) for the most appropriate course of action. Suspension of a member of staff is a neutral act and is not the default option; alternatives to suspension will always be considered. In some cases, however, a member of staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and
that all parties are protected. In the event of suspension, RMT will provide support and a named contact for the member of staff.

Allegations made against a Provision Leader should be reported to the Executive Team Member/Regional Director with responsibility for safeguarding and utilise RMT’s Whistleblowing policy. Any allegations regarding the Executive team should be reported to the Founder and Executive Chair. The Chair of Trustees/Director and/or Provision Leader would follow the same process in assessing the relevant criteria and reporting to the LADO if the case meets the criteria. Where false allegations or allegations without foundation are found the HR Manager will:

- Prepare a report outlining the allegations and giving the reasons for the conclusion that it had no foundation;
- Inform the member of staff about whom the allegation was made both orally and in writing that no further action will be taken; and
- Reassure the member of staff of RMT’s understanding of the personal impact that false allegations may have and the support RMT will continue to offer.

Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff’s file and stored in accordance with the Disciplinary Policy & Procedure.

Staff, parents and trustees/directors are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. In accordance with ‘Keeping Children Safe in Education DfE 2018’, RMT will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

5.3 Informing the ESFA (Education and Skills Funding Agency) about serious safeguarding incidents

Colleges receiving annual funding allocations from the Education and Skills Funding Agency (ESFA) for the provision of 16-19 education are required through the funding agreements and contracts to inform the ESFA of serious safeguarding incidents when:

- The organisation, or one of its subcontractors is itself the subject of an investigation by the local authority or the police. In such circumstances, the Founder and Executive Chair or senior DSL will email Enquiries.EFA@education.gov.uk with details of the nature of the incident and confirmation that it is or is schedules to be investigated by the local authority and/or the police.
- Safeguarding referrals for ESFA funded learners could result in police investigations. In such circumstances, the DSL will email Enquiries.EFA@education.gov.uk with details of the safeguarding incident and confirmation that it is under investigation by the police. It is not required that any information that identifies individuals or impacts on data protection duties is disclosed.
- If RMT, or one of its subcontractors, is the subject of an investigation by the local authority or the police in connection with a Prevent issue, Founder and Executive Chair or senior DSL will email enquiries.EFA@education.gov.uk with details of the nature of the incident and confirmation that it is or is
scheduled to be investigated by the local authority and/or the police.
- The DSL will notify the ESFA of any Disclosure and Barring Service referral that has been made (no other information is required).

6. Complaints Procedure

RMT’s complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for action under this policy. Complaints are managed by the Provision Leaders and overseen by the Regional Directors. Complaints from staff are dealt with under RMT’s complaints and disciplinary and grievance procedures. Complaints which escalate into a Safeguarding concern will automatically be managed under RMT’s safeguarding procedures.

7. Assessing Risk

Individual student risk assessments are held on each individual student file providing information to support the management of risk in delivering the student’s individual learning programme. The aim is to ensure that the balance of risk against achieving progression remains central to the work of RMT, supporting students to become less vulnerable, more skilled and increasingly independent within the community. Through admissions and continuous individual student risk assessments RMT identifies students who may be considered more vulnerable due to their physical and or emotional problems and levels of understanding of risk.

These risk assessments are maintained by the Education and Learning Coordinators and DSL in conjunction with identified key staff who ensure that the documents remain responsive to the student’s wellbeing and support requirements. These records include quantifying levels of risk and RMT actions to address them. RMT supports all vulnerable learners and has a Designated Lead for looked after Young people and a Designated Lead for E-safety.

Individuals in one-to-one situations with learners are more vulnerable to allegations. Staff and students should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and students. Pre-arranged meetings with students away from RMT premises are not being permitted unless approval is obtained from the parents/carers or the DSL.

Individuals must:

- Avoid meetings with students in remote, secluded areas of the provision.
- Ensure there is visual access and/or an open door in one-to-one situations.
- Inform other staff of the meeting beforehand, assessing the need to have others present or close by.
- Always report to SLT any situation where a student becomes distressed or angry.
- Consider the needs and circumstances of the student involved.

If students are in 1:1 situations with either their peers or adults in a position of trust then, depending upon whether this is an open or closed environment, the activity needs to be fully risk-assessed to mitigate potential risks.
8. Students under 16

RMT will work collaboratively with the appropriate Local Authority/ school in order to share information about the attendance and/or absences of a student who is under the age of 16 as the Local Authority deems necessary.

RMT will inform the relevant Local Authority immediately if a student is removed from roll so that the Local Authority can as part of their duty identify children of compulsory school age who are missing education.

Where an allegation, suspicion or incident is reported, RMT will notify the head teacher / principal or other senior manager with safeguarding responsibility of the relevant school/Local Authority as soon as possible. In all other respects, such allegations, suspicions or incidents will be managed in accordance with RMT’s safeguarding policy and procedure.

9. Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and volunteers who will have direct contact with young people and adults at risk will receive an explanation during their induction which will include:

- RMT’s Young People and Adults at Risk Safeguarding Policy
- Signs and symptoms of abuse and neglect
- Responding to disclosure of abuse or neglect
- Reporting and recording arrangements
- RMT Code of Conduct for Staff
- Details of the DSL.

RMT’s Young People and Adults at Risk Safeguarding Policy and the RMT Code of Conduct for Staff will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work for RMT. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them. All staff, including the Principal, volunteers, trustees and governors will receive appropriate and regularly updated safeguarding training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard effectively in line with statutory guidance.

The Lead and Deputy DSLs will attend refresher training every two years. All staff will be made aware of the increased risk of abuse to certain groups, including students with special educational needs and disabilities, looked after young people, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism, county lines, female genital mutilation and forced marriage.

In addition, at least one trustee / director, a member of the Executive Team, the Regional Directors and a member of each of the senior leadership teams will attend safer recruitment training.
10. Safer Recruitment

10.1 Recruitment

RMT ensures it does its utmost to employ ‘safe’ staff and allow ‘safe’ volunteers to work with learners by following the guidance in ‘Keeping Children Safe in Education DfE 2018’ policy.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explain any gaps in that history;
- provide two referees, including at least one who can comment on the applicant’s suitability to work with students;
- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity;
- if offered employment, provide evidence of their right to work in the UK.

RMT will also:

- ensure that every job description and person specification for roles includes a description of the role holder’s responsibility for safeguarding;
- ask at least one question at interview for every role across RMT about the candidate’s attitude to safeguarding and motivation for working with students;
- verify the preferred candidate’s mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK.

At least one member of each recruitment panel will have attended safer recruitment training. All new members of staff and volunteers will undergo an induction that includes familiarisation with RMT’s Young People and Adults at Risk Safeguarding Policy and RMT Code of Conduct for Staff.

All staff are required to sign to confirm they have received a copy of the Young People and Adults at Risk Safeguarding Policy and RMT Code of Conduct for Staff. RMT will obtain written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in RMT that RMT would have undertaken if they were employing the individual directly. Trainee teachers will be checked either by RMT or by the training provider, from whom written confirmation will be obtained.

RMT maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of ‘Keeping Children Safe in Education DfE 2018’.

All trustees / directors will be the subject of Enhanced DBS checks as defined in ‘Keeping Children Safe in Education DfE 2018’.
10.2 Volunteers

Volunteers will undergo checks commensurate with their work in RMT and contact with students. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

10.3 Contractors

RMT checks the identity of all contractors working on site and requests DBS checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

11. Site Security

Visitors to any RMT site, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their young people do not need to sign in. All visitors are expected to observe the safeguarding and health and safety regulations to ensure students are kept safe. The Provision Leader for each provision will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. RMT has a Visible ID Policy which requires that both staff and learners are required to wear their identity badge whilst on site at all times.

12. Record Keeping

RMT will maintain safeguarding (including early help) records in accordance with the safeguarding policy and RMT’s Data Protection Policy.

RMT will:

- keep clear detailed records of concerns about young people and adults at risk (noting the date, event and action taken), even where there is no need to refer the matter to Social are immediately;
- ensure all records are kept secure and in locked locations;
- ensure all relevant safeguarding records are sent to the receiving school, college or other education establishment when a student moves;
- Safeguarding records will be maintained independently from the student’s file. Such records will only be accessible to the Designated Safeguarding Lead and other staff who need to be aware. Such records will include, in addition to the name, address and age of the learner, timed and dated observations describing the student’s behaviour, appearance, statements/remarks made to staff or other learners and observations of interactions between the learner, other learners, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the student or parent/carer will be recorded. Records will be signed, dated and timed electronically by the member of staff making the record and securely stored on RMT’s Databridge (or equivalent) system. Should a Subject Access Request be received under the Data Protection Act 2018, the request should be referred to the DSL (and Data Protection Task Group) for consideration.

The Data Protection Act 2018 / GDPR does not prevent staff from sharing information with relevant agencies, where that information may help to protect a
student.

13. Confidentiality and Information Sharing

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the student, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Staff will ensure confidentiality protocols are adhered to and information is shared appropriately in accordance with RMT’s Data Protection Policy and Data Retention Policy. If in any doubt about confidentiality, staff will seek advice from the DSL or Trust Head of Safeguarding or Data Protection Task Group as required. It is reasonable for staff to discuss day-to-day concerns about students with colleagues in order to ensure that their general needs are met. However, staff should report all safeguarding concerns to the DSL.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard. Record of Concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

14. Off-Site Arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When students attend off-site activities, including day and residential visits and work related activities, RMT will check that effective safeguarding arrangements are in place.

Where extended activities are provided by and managed by RMT, the Young People and Adults at Risk Safeguarding Policy and procedures apply. If other organisations provide services or activities on site, RMT will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

15. Work Experience and Supported Internships

RMT has detailed procedures to safeguard students undertaking work experience and supported internships, including arrangements for checking people who provide placements and supervising students on work experience which are in accordance with the guidance in ‘Keeping Children Safe in Education DfE 2018’.

16. Residential Settings

Research has shown that young people and adults at risk can be particularly vulnerable in residential settings. RMT complies with the National Minimum Standards and is appropriately inspected by the Care Quality Commission. Staff are alert to inappropriate relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance. Staff receive additional induction and safeguarding training tailored to meet their specific, additional duties.
17. Intimate Care

RMT actively promotes the health care of each student and meets any intimate care needs as detailed in individual care plans as necessary. RMT has a written policy, implemented in practice, on the administration of medication within RMT. RMT adheres to the Social care common inspection framework February 2017 National Minimum Standards.

18. Safeguarding Students with Special Educational Needs

As outlined in Keeping Children Safe in Education 2018, RMT is aware that students with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. This could be because:

- Assumptions are made regarding indicators of possible abuse such as behaviour, mood and injury related to the students disability without due further exploration;
- Such students are more prone to peer group isolation than other young people;
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing signs; and
- Communication barriers and difficulties in overcoming these barriers.

To ensure students with profound and multiple learning difficulties and/or communication complications can communicate their concerns or disclose if they are being abused or harmed, RMT has ensured that a number of alternative methods of communication are available to learners to ensure they are able to articulate their concerns. These include emotion cards, the Makaton system and the use of email.

Staff will be trained in recognising signs of abuse in students with SEN and disabilities.

Staff will take into account the needs of the student when responding to concerns of abuse or when taking a disclosure. RMT recognise that some students require specialist intervention to communicate and advice will be sought in these circumstances.

Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all students can access it.

19. The Use of Reasonable Force

The use of ‘reasonable force’ in RMT schools and colleges. The following guidance is produced in line with current legislation and government guidance. RMT staff should read it in conjunction with the training they receive on Managing Actual and / or Potential Aggression.

There are circumstances when it is appropriate for staff in RMT to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young
person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between students or blocking a student’s path, or active physical contact such as leading a student by the arm out of the classroom.

The guidance, Keeping Children Safe in Education, 2018, indicates that the adoption of a ‘no contact’ policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages head teachers, principals, governing bodies and proprietors to adopt sensible policies, which allow and support their staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

RMT’s policy is that if staff use reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, provision leaders should, in considering the risks carefully, recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. They should plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, and in this way reduce the occurrence of challenging behaviour and the need to use reasonable force.

Under no circumstances does RMT authorise the use of corporal punishment nor condone the use of inappropriate force.

RMT will seek at all times to promote a shared sense of community and belonging amongst students. It recognises that staff will always work to prevent situations where restraint is used and will only reluctantly resort to physical interventions if their best professional judgement deems this to be necessary.

20. Photography and Images

All staff are required to comply with RMT’s Image Use Policy. In summary, to protect students, RMT will:

- seek their consent for photographs to be taken or published (for example, on the RMT website or in newspapers or publications);
- seek parental consent where necessary;
- use only the student’s first name with an image;
- ensure students are appropriately dressed; and
- encourage students to tell us if they are worried about any photographs that are taken of them.

21. Attendance

RMT recognises that full attendance in education is important to the well-being of all students and enables them to access the opportunities made available to them. Attendance is monitored closely and RMT works in partnership with the Local Authority when patterns of absence give rise to concern.
22. Young People Missing from Education

RMT operates in accordance with statutory guidance ‘Children Missing Education (DfE 2018)’ - All young people, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Young people missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, RMT and local authorities is critical to ensuring that all students of compulsory school age are safe and receiving suitable education.

Attendance, absence and exclusions are closely monitored. The DSL will monitor unauthorised absence and take appropriate action, particularly where young people go missing on repeated occasions and/or are missing for periods during the day.

23. Young People Who Are Looked After

The most common reason for young people becoming looked after is as a result of abuse or neglect. RMT ensures that staff have the necessary skills and understanding to keep looked after students safe and ensures that appropriate staff have information about a young person’s looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after them.

RMT is committed to working with other agencies to ensure the best outcomes for Looked After and Previously Looked After children.

24. Young People Who Go Missing from Home or Care

RMT recognises that young people who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

‘Keeping Children Safe in Education DfE 2018’ highlights that ‘Statutory Guidance on Children Who Run Away or go Missing from Home or Care’ requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return. When necessary and in conjunction with the Local Authority, RMT will facilitate Return Home Interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on site for the interview to take place. RMT will check with the Local Authority whether or not parents/carers have given their consent to the interview. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in a RHI or not. If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, RMT will contact the parent/carer and seek to secure their consent. Parents/carers may also choose to accompany their son/daughter in interviews and RMT will facilitate that as appropriate.
25. Helping Learners to Keep Themselves Safe

‘Keeping Children Safe in Education DfE 2018’ requires governing bodies and proprietors to ensure that young people are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a ‘broad and balanced curriculum.’ Learners are taught to understand and manage risk through College personal, social, health and economic (PSHE) education and sex and relationships sessions and through all aspects of educational life. The RMT approach is designed to help learners to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all students and promote sensible behaviour rather than fear or anxiety. Students are taught how to conduct themselves and how to behave in a responsible manner. Students are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. RMT continually promotes an ethos of respect for learners and they are encouraged to speak to a member of staff of their choosing about any worries they may have.

26. Online Safety

RMT’s online safety policy explains how RMT tries to keep learners safe and protect and educate them in the safe use of technology. Cyberbullying and sexting by students will be treated as seriously as any other type of bullying and will be managed through RMT learner behaviour policy. Serious incidents may be managed in line with the Young People and Adults at Risk Policy and procedures. All staff receive online safety training and each site has a nominated online safety co-ordinator.

26.1 Bullying

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through RMT anti-bullying procedures. If the bullying is particularly serious, or the antibullying procedures are deemed to be ineffective, the DSL will consider implementing early help (Common Assessment Framework) or safeguarding procedures.

26.2 Young people with sexually harmful or inappropriate behaviour

Members of staff who become concerned about a learner’s sexualised behaviour, including any known online sexualised behaviour, should record their concerns and report them to the DSL as soon as possible, as with any other safeguarding concern. The management of young people with sexually harmful behaviour is complex and RMT will work with other relevant agencies to maintain the safety of the whole community. Young people who display such behaviour may be victims of abuse themselves and the safeguarding procedures will be allowed for both victim and perpetrator.

Any instances of sexual harm caused by one learner to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with Children’s or Adult Social Care. In responding to cases involving young people or adults at risk, who have committed sexually abusive behaviours, Social Care will consult with the appropriate agencies for advice, consultation or provision of a direct service.

RMT is committed to participating in plans both to provide students who are at risk
from other students and those who may present a risk to other students with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education for all learners concerned, subject to appropriate risk assessments and risk management plans.

26.3 Youth produced sexual imagery (‘Sexting’)

‘Sexting’ refers to any sharing of youth produced sexual imagery between children. This includes:

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under 18;
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under 18 or an adult;
- A person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns and recorded on RMT’s Databridge (or equivalent) system. The primary concern at all times will be the welfare and protection of the young people involved. All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. This could include:

- Confiscation of mobile phones in line with guidance ‘Searching, Screening and Confiscation 2018’;
- Referral to police of Social Care;
- Sanctions in accordance with the behaviour policy; and/or
- Support for students to prevent re-occurrence.

Parents/carers will be informed if appropriate and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Social Care and/or the Police immediately.

RMT has a responsibility to educate students in the risks to ‘sexting’ and how to keep safe online.

26.4 Mobile Devices

Children, young people and adults now regularly use mobile devices with the capability to text, phone, access social networks, music, videos & gaming sites, take photographs and record videos. Most people use these devices responsibly & some consider them an important part of their safety. For some, there are concerns over safety & security either as victims or perpetrators of misuse.

Student misuse:

- Staff can confiscate the device as a disciplinary procedure;
- Provision Leaders & authorised staff are allowed to search pupils/students & their possessions: with consent & confiscate items if reasonable; without consent and confiscate suspected specified prohibited items (including pornographic images, items used to commit an offence, or to cause personal injury or damage to property);
• If inappropriate material is seen on the device, authorised staff can decide whether to:
  o Delete that material;
  o Retain it as evidence (of a criminal offence or a breach of discipline) advice should be obtained from DSL/D; and/or
  o Report it to the police (if the material is of such seriousness).

26.5 Sexual Exploitation of Young People (Child Sexual Exploitation)

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of young people. Victims can be boys or girls. Young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a student’s physical and emotional health. It may also be linked to the trafficking of children.

RMT teaches students about consent and the risks of sexual exploitation in PSHE and the curriculum.

A common feature of sexual exploitation is that the young person often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The young person may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse. All staff are made aware of the indicators of sexual exploitation of students and all concerns are reported immediately to the DSL. The DSL will consider the need to make a referral to Social Care.

26.6 Honour Based Violence (HBV)

So-called ‘honour-based’ violence encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include forced marriage, and practices such as breast ironing. Staff will be alert to the possibility of a student being at risk of HBV or already having suffered HBV. All forms of so called HBV are abuse (regardless of the motivation) and staff will record and report any concerns about a student who might be at risk of HBV to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police, and/or Social Care as with any other safeguarding concern; and may also contact the Forced Marriage Unit for advice as necessary.

26.7 Female Genital Mutilation (FGM)

Female genital mutilation is a form of abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth. FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Staff are trained to be aware of risk indicators. Staff should be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. In Scotland this practice is illegal under the Prohibition
of Female Genital Mutilation Act 2005.

If staff have a concern that a student may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. Teachers, in particular, are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a student who is aged under 18. This is known as mandatory reporting. Teachers will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police.

26.8 Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure.

It may also involve physical or sexual violence and abuse. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in the UK. Staff should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not being allowed to return to the UK. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

26.9 Radicalisation and Extremism (Prevent)

Protecting young people from the risk of radicalisation is part of RMT's wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The Government defines extremism as vocal or active opposition to fundamental British values. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. RMT is committed to preventing students from being radicalised and drawn into any form of extremism or terrorism.

RMT promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing learners with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all students are valued and listened to within RMT.

Staff receive training that provides them with both the information they need to understand the risks affecting young people and a specific understanding of how to identify individual students who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

RMT recognises the importance of providing a safe space for learners to discuss
controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, RMT will make appropriate referrals to the Police PREVENT team in respect of any learner whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that they receive appropriate support.

RMT expects all staff, volunteers, trustees, governors, visiting professionals, contractors and individuals or agencies that hire College premises to behave in accordance with the RMT Code of Conduct for Staff, will challenge the expression and/or promotion of extremist views and ideas by any adult on RMT premises or at events and, when necessary, will make appropriate referrals in respect of any such adult.

27. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a young person for a period of 28 days or more, with the agreement of the young person’s parents. It applies to young people under the age of 16, or under 18 if the young person is disabled. Young people looked after by the Local Authority or who are placed in a residential school, children’s home or hospital are not considered to be privately fostered.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children’s Social Care as soon as possible. When RMT becomes aware of a private fostering arrangement for a student that has not been notified to Children’s Social Care, RMT will encourage parents and private foster carers to notify Children’s Social Care and will share information with Children’s Social Care as appropriate.

28. Related Safeguarding Portfolio Policies

- RMT Code of Conduct for Staff
- Complaints Procedure
- Anti-Bullying Policy (Learner)
- Whistleblowing Policy
- Safer Recruitment Policy
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Behaviour Management and Disciplinary Policy (learners)
- Absence Procedure

RELEVANT LEGISLATION AND GUIDANCE

- Keeping Children Safe in Education (Statutory Guidance from Department for Education, September 2018)
- Working Together to Safeguard Children (Department for Education, 2018)
- What to do if you are worried a child is being abused - Advice for practitioners (Department for Education, March 2015)
- Teacher Standards 2012
- Counter-Terrorism and Security Act 2015
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (2009)
- Sexual Offences Act 2003
- Searching, Screening and Confiscation 2018
• The Care Act 2014
• The Care Standards Act 2000
• The Children Act 1989 and 2004
• The Children Act 1995 (Scotland)
• Children and Young People (Scotland) Act 2014
• Adult Support and Protection (Scotland) Act 2007
• Education Act 2002 and 2011
• Education and Inspection Act 2006
• The Human Rights Act 1998
• The Protection of Children Act 1999
• Female Genital Mutilation Act 2003

**ADDITIONAL LEGISLATION AND GUIDANCE RELEVANT TO WALES AND SCOTLAND**

• Keeping learners safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002. (Statutory Guidance from the Welsh Government, January 2015)
• Children and Young People (Scotland) Act 2014
• Adult Support and Protection (Scotland) Act 2007
• National Guidance for Child Protection in Scotland
• Scotland is getting it right for every child (GIRFEC) Scottish Government, 2015

**LINKS: related legislation, policies, procedures and protocols**

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**IMPACT OF NON-COMPLIANCE FOR**

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<td>increased risk of harm: physical psychological or developmental Increased risks to wellbeing, health and development associated with involvement in FGM, Radicalisation or Extremism, criminal proceedings</td>
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**GLOSSARY OF TERMS:**

- **Child:** a young person under the age of 18. However, in line with the Sexual Offences Act 2003, this age limit may be extended for young people with Learning Difficulties/Disabilities.

- **Adult at risk:** ‘A person (18 or over) who has needs for care and support (whether or not the local authority is meeting any of those needs), is experiencing, or is at risk of, abuse or neglect and, as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

- **British Values:** Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. Mutual respect and
tolerance includes encouraging students to respect other people with particular regard to the protected characteristics of the Equality Act, 2010.

- **Designated Safeguarding Lead (DSL):** A senior manager in each of the Trust Provisions who has lead responsibility for safeguarding children or adults at risk.

- **Extremism:** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

- **Radicalisation:** is the act or process of making a person more radical or in favour of extreme or fundamental changes in political, economic or social conditions. It is often linked to political or religion-based beliefs.

- **Safeguarding:** Safeguarding is about protecting students from maltreatment; preventing impairment of their health or development; ensuring they grow up in circumstances consistent with the provision of safe and effective care; and taking actions to enable them to have the best outcome.

- **Ruskin Mill Trust:** (the Trust): a Rudolf Steiner educational charitable trust which provides education and residential care services for children and adults, some of whom are adults at risk, in various provisions located across the UK.

- **Trust provision:** Argent College, Brantwood Specialist School, Clervaux, Coleg Plas Dwbl, Freeman College, Glasshouse College, Ruskin Mill College, Sunfield Children’s Home

- **Student:** any pupil, student or service user who is on the register of any of the Trust provisions which is a child or an adult at risk.