

<b>Safeguarding Policy and Procedure (Child Protection and Protection of Adults at Risk)</b>	
<b>Date approved by Trustees</b>	August 2018
<b>Date for next review</b>	July 2019
<b>Compliance lead</b>	Trustee with responsibility for Safeguarding
<b>Agreed Policy file name</b>	Safeguarding Policy and Procedure
<b>Agreed policy location:</b>	RMT website ( <a href="http://www.rmt.org">www.rmt.org</a> - public access) and RMT Information area\Policies and Procedures

Ruskin Mill Trust (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 College and School these young people are known as ‘students’ and will hereafter be referred to collectively as students.

#### DESIGNATED SAFEGUARDING LEADS

Each of the colleges, schools 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 can be found in Annex 1, 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.

#### POLICY:

- To create at each Trust Provision a safeguarding culture and environment where the opportunities for abuse, neglect or exploitation, and risks of radicalisation and Female Genital Mutilation (FGM) are minimised.
- To create at each Trust Provision a safeguarding culture and environment where children, adults at risk and staff have the confidence to voice any concerns or fears they may have about abuse, neglect or exploitation and where they feel able to disclose allegations of harm or abuse.
- To describe the actions that must be taken when abuse, neglect, exploitation, radicalisation or FGM is suspected or disclosed.
- Where reference to students this should be considered to be children (everyone under the age of 18), and adults at risk

The Trust has adopted the following principles in relation to the protection of Students/residents:

- Safeguarding is about protecting children and adults at risk 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.
- The welfare of children and adults at risk is paramount.

The protection of children and adults at risk is everyone's responsibility.

- All children and adults at risk - whether they have a protected characteristic or not - have the right to protection from significant harm.
- All allegations and suspicions of abuse will be taken seriously and responded to swiftly and appropriately.
- Each Trust Provision will follow statutory and specialist guidelines in working with children and adults at risk when responding to all allegations and/or suspicions of abuse.
- The Trust will seek to support all those affected by abuse.
- In respect of safeguarding individuals from radicalisation, the Trust works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for students through referrals to the Channel Programme.
- In relation to FGM the Trust will work as part of a multi-agency group to support those affected, and this will include social care agencies and the police.
- It is recognised that Peer on Peer abuse may take place, and the Trust will do all it can to prevent this through education and the use of appropriate sanctions. The Trust will never tolerate or pass this off as 'banter' or 'part of growing up'.
- There is a separate missing student/resident policy which should be used in the instance of a student/resident going missing.

#### DEFINITIONS OF ABUSE:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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.
- **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.
- **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.
- **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.
- **Child trafficking:** Child trafficking is a type of abuse where children 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.
- **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:** This is abuse occur in an establishment such as a college, school (including residential provision) that may range from poor practice to ill treatment and gross misconduct. For example, lack of individual care, no flexibility of bedtimes or waking, deprived environment and lack of stimulation.
- **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.

## **ROLES AND RESPONSIBILITIES Board of Trustees**

A member of the Board of Trustees takes special responsibility for monitoring safeguarding across the Trust. They will liaise with relevant external authorities should an allegation be made about any of the Trustees, Provision leaders or designated safeguarding leads.

### **Executive Team member with responsibility for safeguarding**

The Executive Team member with responsibility for safeguarding will

- Support the development of a safeguarding culture across the Trust, and ensure that there is effective Cross-Trust working.
- Hold at least one Trust wide safeguarding working group per year.
- Ensure that this policy is updated annually or in response to revised statutory guidance issued by the DfE and that the current policy is available on the Ruskin Mill Trust website [www.rmt.org](http://www.rmt.org) and available for staff to access via the RMT Information area and within each provision.
- Ensure that the policy, together with the statutory guidance, 'Keeping children safe in education' is made available to all RMT staff annually and they are required to sign to indicate that they have read and understood the policy and the guidance.
- Ensure that the Trust wide IT infrastructure has considered online safety in terms of filters and appropriate monitoring systems.
- Ensure that each provision has the teaching of safeguarding, including online safety within their offer to each student.
- Ensure that the Trust has appropriate processes in place in relation to safer recruitment.
- Ensure that there are appropriate procedures in place to handle allegations against staff, volunteers etc.
- Ensure that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.

## Provision Leader

At each Trust Provision the Provision leader will:

- Fulfil the responsibilities of, or appoint, a designated safeguarding lead person (DSL) to take lead responsibility for safeguarding students. Ensure that DSLs have relevant expertise and are trained to local authority standards, including annual refreshers, to respond to allegations and concerns, and to collate safeguarding data. DSLs are also responsible for ensuring that the designated safeguarding deputies have the skills and knowledge to discharge their safeguarding responsibilities and access appropriate training to equip them in their roles.
- Appoint a number of designated safeguarding deputies who are trained to the same local authority standard as the DSL and will support the DSL in ensuring a high standard of safeguarding rigour.
- Ensure that the DSL and designated safeguarding deputies have appropriate external supervision to support them in undertaking their role.
- Plan and resource the appropriate assessment and supervision of students to ensure their safety.
- Recruit all staff who work with students in line with the approved safer recruitment programme by ensuring that everyone working in regulated activity with children or adults at risk:
  - has undergone a Disclosure and Barring Service check at an enhanced level
  - is adequately trained and supervised within their working role
  - understands and follows the Trust's Safeguarding Policy and Procedures and acts in good faith
  - is registered with their relevant professional body (if appropriate).
- Ensure that all staff and volunteers are aware of their responsibility to inform the DSL of any concerns they have about abuse, neglect or other safeguarding concern in relation to a student. Also, that they are aware that they can make a direct referral to children's or adult social care if they believe there is a risk of immediate serious harm.
- Ensure that teaching staff safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Ensure 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.
- Ensure that appropriate recording and monitoring systems are in place.
- Ensure that effective induction takes place all new students, staff and volunteers with safeguarding information and procedures, including details about the Trust's code of conduct and the role of the designated safeguarding lead.
- Ensure that there are annual updates for all staff, this may be via training or briefings but will ensure that staff have the relevant skills and knowledge to safeguard students effectively.

- Allocate students to staff who will work with them as advocates to promote self-esteem and to enable and empower them to speak up if they have safeguarding concerns or if they feel something is wrong.
- Ensure that all staff understand and embed their responsibilities to prevent radicalisation within their sessions and teaching.
- Ensure that all staff are aware of their duty to report to the Police where they discover that an act of FGM appears to have been carried out.
- Ensure that staff are aware of the ability to identify students who may benefit from early help and how this can be accessed.
- Ensure that effective risk assessments are carried out for all key activities. This includes mental capacity assessment for students who are identified as at risk of abuse and where there is a question about the student's ability to consent.

## Designated Safeguarding Lead (DSL)

The following sections are copied from Keeping Children Safe in Education and describe the role of the DSL in all RMT provision.

Governing bodies, proprietors and management committees should appoint an appropriate **senior member** of staff, from the school or college **leadership team**, to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection. This should be explicit in the roleholder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings - and/or to support other staff to do so - and to contribute to the assessment of children.

### Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

### Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

### Work with others

The designated safeguarding lead is expected to:

- liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

## **Training**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;<sup>87</sup>
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

## **Raise Awareness**

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding

## All staff

- All staff have a responsibility to provide a safe environment in which our students can learn
- All staff should be prepared to identify students who may benefit from early help
- Any staff member who has a concern about a student's welfare in relation to safeguarding should follow the safeguarding procedure below.
- If any member of staff in the course of their work discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, this must be reported.

## REPORTING ABUSE

- Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subject to it.
- Abuse could be from any person including family, carers, neighbours, peers, staff other students or strangers.
- Students themselves may abuse others, including their carers.
- Abuse has many different forms, including hate or hate crime which involves targeting a person's difference and/or where victims consider their perpetrators to be their friends.
- Abuse can be perpetrated via electronic methods and e-safety is key to protecting students from harm arising from use of computers, mobile devices and social media.
- Radicalisation of children or adults at risk is abuse.
- Female genital mutilation is abuse.

It is the responsibility of all staff to report any concerns about abuse, risk of harm or any other safeguarding or radicalization concerns to the DSL/DSD's at their Provision. Any concerns in relation to FGM are to be reported directly to the Police by the member of staff member who discovers or suspects FGM.

All staff are expected to observe the Trust's Confidentiality Policy. However, the safeguarding needs and wellbeing of children, young people and adults at risk take precedence over issues of confidentiality; therefore, all concerns, even if they appear to breach the Trust's Confidentiality Policy, should be reported to their DSL/DSD's.

Staff should therefore never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

Similarly, the Trust reserves the right where appropriate to inform outside agencies when permission to do so has not been given by a member of staff, volunteer, student, parent or carer. Once a safeguarding, FGM or Prevent procedure has been initiated, information will be shared on a need to know basis only.

## PROCEDURE

Even if a member of staff thinks or believes that an allegation or disclosure may be untrue, it is still their duty to report it. It is not the role of staff to investigate any safeguarding concerns they may have. The following procedure must be followed by all staff or volunteers when:

- a student discloses to them that abuse has, or may have occurred
- they witness an incident that could be considered to be abusive
- they have a concern that a student may have been or is being abused or at risk of harm or radicalisation.

### 1 - Ensure Safety

The first priority is to ensure the safety and protection of students. In making the person, and others potentially at risk, safe it may be necessary to inform emergency services. If medical treatment is not immediately required, medical examinations should not be arranged until a Safeguarding strategy is agreed.

### 2 - Report and Record

Report concerns as soon as possible to the DSL. It may be necessary to inform other staff on duty that there has been an incident but information passed to them should be kept to a minimum.

If it is suspected a member of staff may be the perpetrator or involved in some way, this information must be passed on to the Provision lead.

If it is suspected that the DSL or the Provision leader may be a perpetrator or involved in some way, contact the Executive Team member with responsibility for safeguarding or the Trustee with responsibility for safeguarding or the Police immediately.

Records of incidents and concerns should be written as soon as possible. Forms and electronic systems are available to support recording, but records can be made by any available method. If records are hand-written, the date, signature, name and role of the person making the report must be made clear. If subsequently typed up, the original should be kept on file.

Staff should be aware that the outcome of any alert, referral or investigation and any records relating to it could be used as evidence in a range of procedures; disciplinary, criminal or within safeguarding procedures.

### 3 - Concerns with safeguarding practice

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 lead.

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

## UPDATES 2018

The following sections reflect alterations or additions to national safeguarding guidance introduced in 2018. They will be fully integrated into the RMT policy in due course. RMT acknowledges its use of Sheffield Safeguarding Children Board documentation in the preparation of these updates.

### 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:
  - Delete that material
  - Retain it as evidence (of a criminal offence or a breach of school discipline) or
  - Report it to the police (if the material is of such seriousness)

#### Staff must always:

Follow statutory requirements when searching

- Help & support all students involved
- Consult with the DSL/D about whether to deal with the matter through online safety or antibullying procedures, or referral to the police
- Inform parents and carers as appropriate

Did you know?The age of criminal responsibility is 10 years. It is a crime to:

- Harass or bully via a text, email or phone call
- Create, possess or distribute indecent images of someone under 18 years even with consent or if they are self-generated

#### Tips:

- Taking a photograph without consent is an invasion of privacy & may be distressing
- Once photos are sent to another device, social network or website, they become impossible to fully track or delete
- Giving out personal information (including photos) to people you do not know could put children, young people & adults at risk of harm
- Location tracking services allow any individual to identify the location of people & devices

#### Staff should never:

- Store any personal information about a student on their personal mobile devices
- Comment about a student or their family on social media or other public forum
- Seek contact with or respond to requests for contact from a student or their families via personal phones, text, e-mail or social networking accounts
- Give their personal contact details to a student including e-mail address, social networking accounts, home or mobile phone numbers
- However: if the student &/or their family are personal friends or relatives, inform your senior manager immediately.

To ensure safe and responsible mobile device use, we should all:

- Respect & protect our own and other people's privacy, identity and whereabouts
- Use our devices responsibly

- Never share other people's personal details without their permission
- Always report illegal, inappropriate, distressing and scary contact
- Have an understanding how to keep ourselves safe online and through mobile devices.

If a child or young person tells you something that concerns you:

- Allow them to speak without interruption
- Accept and remember what they say
- Never agree to keep information confidential
- Tell them that you:
  - Will try to help them
  - Must always pass safeguarding concerns to the Designated Safeguarding Lead or Deputy (DSL/D)
- Always write down what you have been told (using the actual words said to you) and give the record to the DSL/D immediately.
- Do not keep a copy for yourself.
- Staff & volunteers should also be able to raise concerns about poor or unsafe practice and potential failures through the whistleblowing procedures.

Detailed national guidance is available here:

- Supporting pupils at school with medical conditions, DfE 2014
- Special Educational Needs and Disability code of practice, DfE 2013
- Ensuring a good education for children who cannot attend school because of health needs. DfE 2013

Useful web links & resources:

- Screening, Searching & Confiscation: for schools DfE 2018
- Thinkuknow
- Childnet International Resources
- NSPCC: Sexting

## Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

FGM is illegal in the UK & in October 2015 it became mandatory for teachers, social workers & health professionals to report 'known' cases of FGM to the Police.

When FGM involves girls under 18 it is classified as child abuse with potential for long-lasting harmful physical and psychological consequences. Girls who are threatened with, or have undergone FGM may withdraw from education, affecting their educational & personal development; they may feel unable to oppose the wishes of their parents & may suffer emotionally as well as physically.

Indicators:

- The girl's community or country of origin is high risk of FGM plus the girl:
- Has a mother or female relative who has had FGM
- Is uncomfortable walking, sitting or standing
- Spends longer than usual in the toilet
- Has frequent urinary, menstrual or stomach problems.
- Has prolonged or repeated absences from the education setting
- Or you may overhear references to being cut, closed, circumcised or other terms.

Staff may also become concerned about a female pupil because:

- She appears anxious, depressed and withdrawn
- Her educational performance, aspirations or motivation may decline
- Her friends report their concerns

Girls may be most at risk during the summer holiday, so pay particular attention in the summer

term, & when girls return in the autumn.

Education settings can create an 'open' and supportive environment by:

- Circulating & displaying materials about FGM
- Raising mandatory reporting duty & awareness of FGM among all staff, through e.g. training, briefing sessions, guidance, etc. Ensuring that the safeguarding team is fully aware of the issues around FGM
- Introducing FGM into the school curriculum within relevant classes, such as PSHE, Sex & Relationship Education (SRE), Science & Citizenship.

Actions:

- Talk to students about FGM professionally & sensitively
- Explain that FGM is illegal in the UK and that they will be protected by the law
- If you are concerned that a student is at immediate risk of, or has undergone FGM, you must inform your Designated Safeguarding Lead or Deputy (DSL/D) immediately
- Staff must also report 'known' cases of FGM direct to the police by ringing 101

The DSL/D must:

- Make an immediate referral to Children's Social Care for further investigation with the Police & health services
- Talk to the student about why they have made a referral (particularly if against their wishes)

Staff should not:

- Examine a student (unless part of their normal personal care, e.g. disability care etc.)
- Treat such concerns as a 'domestic' issue
- Ignore what the student has told them or dismiss the need for immediate protection
- Decide that it is not their responsibility to follow up the allegation
- Discuss their concerns with the student's family or community, in advance of any enquiries by the police, adult or children's social care

In all situations the girl should be offered counselling and medical help, and assess other related females who may be at risk.

Agencies will always work with parents, wider family, community leaders & organisations to prevent & educate about FGM & its consequences.

Useful resources:

- Multi-agency statutory guidance on Female Genital Mutilation HM Govt 2016
- Mandatory Reporting of Female Genital Mutilation – Procedural Information HO 2016

### **Allegations of abuse against staff & volunteers**

These procedures apply where an adult who works (paid or unpaid) with children or young people at a RMT provision setting has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

The Trust has a 'duty of care' and should:

- Act to minimise the stress in this process
- Inform employees as soon as possible unless the police object
- Provide appropriate support to employees
- Appoint a named person to keep the employee informed of the progress of the case
- Advise employee to contact their trade union
- Give access to welfare counselling or medical advice if provided by the employer

- Maintain confidentiality
- Advise all parties about reporting restrictions preventing the publication of material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil/student from the same school or college

All allegations should be:

- Dealt with by the Provision Leader, Trustee with responsibility for safeguarding or Executive team member with responsibility for safeguarding. This person will be referred to hereafter as the Case Manager
- Responded to quickly, fairly & consistently, protecting the child or young person, whilst supporting the person subject to the allegation
- Systematically recorded by the LADO & Case Manager, detailing all decisions & actions
- The Case Manager should inform the LADO within one working day of all allegations that may meet the criteria above, so they can consider the nature, content and context and agree a course of action.

Considerations:

- Apply procedures with common sense & judgement
- If the allegation is about physical contact, the strategy discussion should consider whether 'reasonable force' has been used
- All options to avoid suspension should be considered prior to taking that step
- If investigation by the police or children's social care is unnecessary, the Case Manager should consider further options with the LADO
- Resignation/ceasing service provision should not prevent an allegation being followed up
- 'Compromise agreements' must never be used
- Referral to the Disclosure & Barring Service (DBS) must be made if the criteria are met
- No cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references
- A phased return and/or the provision of a mentor may be appropriate if staff have been away from work during investigation
- At the end of a case where the allegation is substantiated, the LADO should review the case with the case manager and Safeguarding Children Advisor, Education, to identify any improvements that are required.

Potential outcomes

- Substantiated: sufficient evidence to prove allegation
- Malicious: sufficient evidence to disprove the allegation & a deliberate act to deceive
- False: sufficient evidence to disprove the allegation
- Unsubstantiated: insufficient evidence to prove/disprove allegation, not implying guilt or innocence

The Designated Safeguarding Lead/Deputy should ONLY liaise with the "case manager" & LADO about child protection concerns and NOT about employment issues concerning the staff member or volunteer.

Process checklist:

Action required to secure the immediate safety or well-being of child/young person:

- Does the child/young person need medical attention, to be removed from the scene of an incident, a member of staff to look after them until their mother, father or carer arrives?
- Report incident/concern to Head Teacher, Principal, Chair of Governors, Head of Service etc immediately

Action required from the Case Manager

- Do the police need to be involved immediately, e.g. if there is an immediate risk to children or if an offence has been committed?
- Record dates/times of alleged incidents, details of those involved and any potential witnesses
- Gather & secure any already existing evidence, but do not take statements, this is a police role

- Listen to the child/young person, encourage them to speak but do not lead or probe
- Verify that the alleged event(s) could have happened: e.g. was the member of staff on duty and present when the alleged incident took place? Are there witnesses?
- Contact the LADO immediately if advice is needed, otherwise email the information via LADO request form using secure email or fax.

The LADO will determine the nature and scope of the investigation and consultation with the police/social care; responsibility for employment matters rests with employer but will form part of the advice given.

- After consultation with the LADO, inform the accused person, providing them with as much information as possible, unless the police and Children's Social Care are involved and need to agree what information to disclose
- Consider whether suspension is needed or if an alternative arrangement can be made until the allegation is resolved
- Inform mothers, fathers or carers as soon as possible unless police/social care need to be involved or a strategy discussion is required
- Contact Human Resources, especially if suspension or other action is being considered pending an investigation
- Decide what, if anything, you can tell other staff members, considering confidentiality, the views of the member of staff and their representative
- No details should be discussed with other people – all staff must observe confidentiality
- All parties should be advised about reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil/student from the same school or college.

### **The use of 'reasonable force' in RMT schools and colleges**

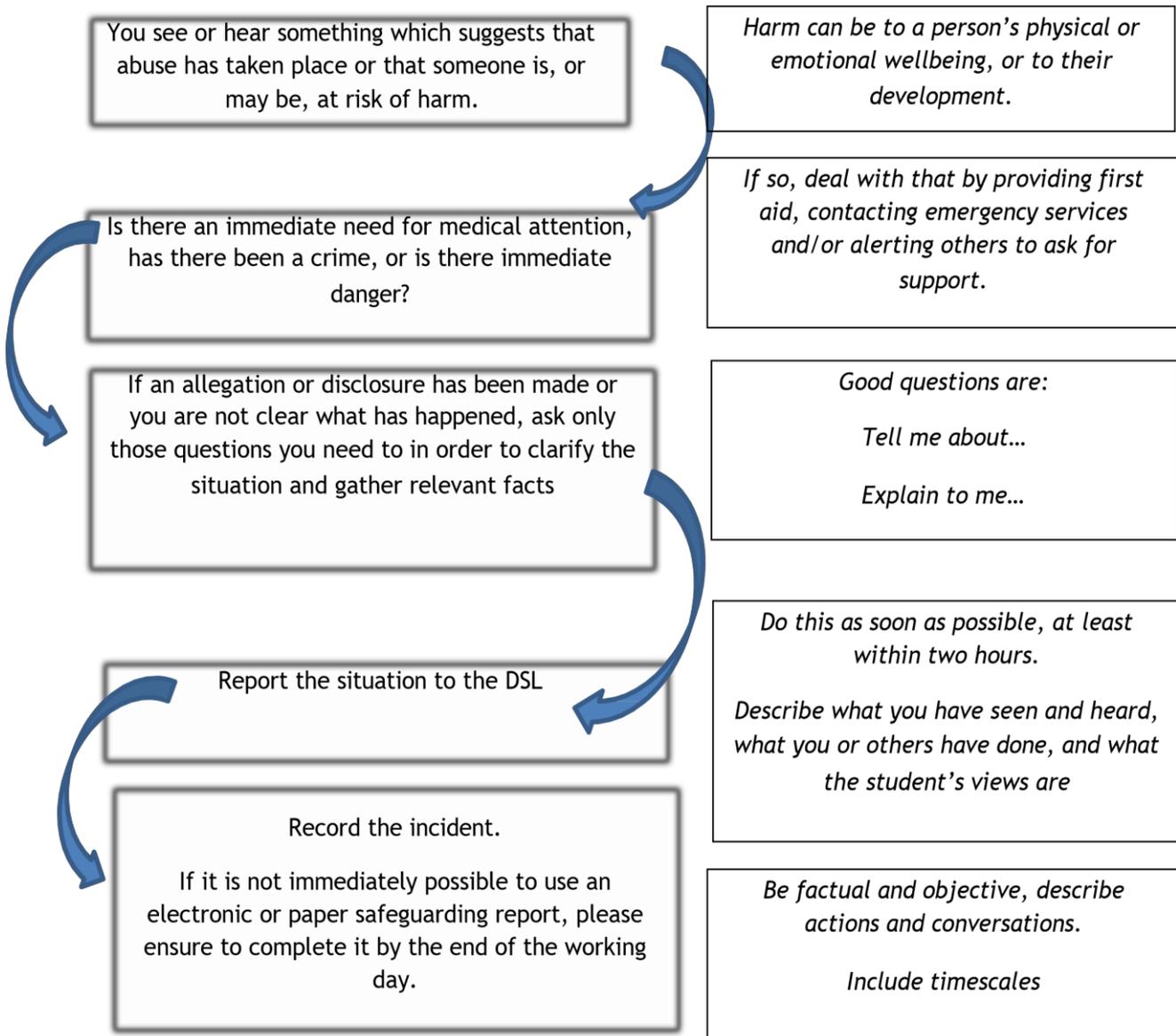
The following guidance is produced in line with current legislation and government guidance. RMT staff should read it in conjunction with the training they receive on Managing Actual and / or Potential Aggression.

There are circumstances when it is appropriate for staff in RMT schools and colleges 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 pupils or blocking a pupil's path, or active physical contact such as leading a pupil 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 headteachers, 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.

## The Safeguarding Process:



### TRAINING

All staff will receive initial and on-going training related to safeguarding and Prevent at least in line with the requirements of the local Safeguarding Board. Staff with designated safeguarding lead responsibilities will also undertake the required higher level training as set out by their local safeguarding boards, and this will be refreshed in line with the local Safeguarding Boards.

## 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
- The Care Act 2014
- The Care Standards Act 2000
- The Children Act 1989 and 2004
- 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

- Safeguarding Children: Working Together Under the Children Act 2004 published by the Welsh Government in 2007
- 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)

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

RELATED DOCUMENTATION	Found at
Bullying	<a href="https://www.gov.uk/government/publications/preventing-and-tackling-bullying">https://www.gov.uk/government/publications/preventing-and-tackling-bullying</a>
Care Act and Safeguarding	<a href="http://www.scie.org.uk/care-act-2014/safeguarding-adults/">http://www.scie.org.uk/care-act-2014/safeguarding-adults/</a>
Channel Duty Guidance HM Government	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf</a>
Keeping Children Safe in Education DfE 2018	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707761/Keeping_Children_Safe_in_Education_-_September_2018.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707761/Keeping_Children_Safe_in_Education_-_September_2018.pdf</a>
Keeping learners safe, Welsh Government 2015	<a href="http://www.gov.wales/topics/educationandskills/.../keeping-learners-safe/?lang=en">www.gov.wales/topics/educationandskills/.../keeping-learners-safe/?lang=en</a>
Mental Capacity Act	<a href="http://www.justice.gov.uk/protecting-the-vulnerable/mental-capacity-act">http://www.justice.gov.uk/protecting-the-vulnerable/mental-capacity-act</a>
Children Missing From Education	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_statutory_guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_statutory_guidance.pdf</a>

PREVENT Strategy HM Government	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf</a>
Safeguarding Children, Welsh Government	<a href="http://www.wales.gov.uk/pubs/circulars/2007/nafwc1207en.pdf?lang=en">www.wales.gov.uk/pubs/circulars/2007/nafwc1207en.pdf?lang=en</a>
Safeguarding Adults, Welsh Government	<a href="https://socialcare.wales/resources/wales-interim-policy-and-procedures-for-the-protection-of-vulnerable-adults-from-abuse">https://socialcare.wales/resources/wales-interim-policy-and-procedures-for-the-protection-of-vulnerable-adults-from-abuse</a>
Sexual exploitation	<a href="https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited">https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited</a>
Types of abuse	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/</a>
When and how to share information	<a href="https://www.gov.uk/government/publications/information-sharing-for-practitioners-and-managers">https://www.gov.uk/government/publications/information-sharing-for-practitioners-and-managers</a>
Working Together to Safeguard Children HM Government 2018	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf</a>
Female Genital Mutilation	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_FINAL.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_FINAL.pdf</a>
Forced marriage	<a href="https://www.gov.uk/guidance/forced-marriage">https://www.gov.uk/guidance/forced-marriage</a>

IMPACT OF NON-COMPLIANCE FOR	
Staff	Criminal proceedings, prosecution, disciplinary or regulatory actions/sanctions [DBS barred lists]
Students	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
Legislation / organisation	Prosecution/litigation, reputational damage, regulatory action

### 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.

## Annex 1

### DSLs and other contacts for each RMT Provision

#### Argent College

Provision Lead	Alex Griffin	College Principal
Designated Safeguarding Lead	Alex Griffin	College Principal
Designated Safeguarding Deputy and SG team member	Jo Chapman	Student Engagement Manager
TBC		
Contact Reception	0121 633 1270	
Contact out-of-hours duty	07977 174790	
Local Safeguarding Boards		
Children's Safeguarding	0121 303 1888	0121 675 4806
Adult Safeguarding	0121 303 1234	0121 464 9001
Birmingham Safeguarding Children Board	<a href="http://www.lscbbirmingham.org.uk/index.php">http://www.lscbbirmingham.org.uk/index.php</a>	
Birmingham Safeguarding Adults Board	<a href="http://www.bsab.org/publications/policy-procedures-and-guidance/">http://www.bsab.org/publications/policy-procedures-and-guidance/</a>	

## Brantwood Specialist School

Provision Lead	Perdita Mousley	Executive Head Teacher
Designated Safeguarding Lead	Adam Leathwood	Safeguarding Manager
Designated Safeguarding Deputy and SG team member	Marc Hughes	Deputy Head Teacher
	Digby Brown	Learning Engagement Manager
	Caroline Bell	Head Teacher
	Deborah Dawson	Head of Care
	Tom Linley-Shaw	Sixth Form Teacher
Contact Reception	0114 258 9062	
Contact Out-of-hours duty	07812 234349	Adam Leathwood
	07805 304242	Marc Hughes
	07805 304202	Deb Dawson
	07805 304222	Digby Brown
	07555 891796	Tom Lindley-Shaw
	0114 2589062 07805 304209	Caroline Bell
Local Safeguarding Boards	0114 273 4855 <a href="https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-and-resources/referring-a-safeguarding-concern-to-childrensocial-care">https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-and-resources/referring-a-safeguarding-concern-to-childrensocial-care</a>	
Sheffield Children's Safeguarding Hub		
Adult Safeguarding	0114 273 6870	
Sheffield Safeguarding Children Board Policy	<a href="http://www.safeguardingsheffieldchildren.org/sscb/education/policies-1">http://www.safeguardingsheffieldchildren.org/sscb/education/policies-1</a>	
Sheffield Safeguarding Adults Board Policy	<a href="https://shsc.nhs.uk/wp-content/uploads/2016/05/Safeguarding-Adults-Policy.pdf">https://shsc.nhs.uk/wp-content/uploads/2016/05/Safeguarding-Adults-Policy.pdf</a>	

## Clervaux

Provision Lead	Perdita Mousley	Principal
Designated Safeguarding Lead	Mark Gillen	Registered Manager
Designated Safeguarding Deputy and SG team member	Adam Leathwood	Safeguarding Manager
	Emma Hickmans	Bishops House Manager
	Lone Helliwell	Tutor and AWS Lead
Contact Reception	01325 729862	
Contact out-of-hours duty	07901931464	
Local Safeguarding Boards		
Children's Safeguarding	01325 406222	
Adult Safeguarding	01325 742030	
Darlington Safeguarding Children Board	<a href="http://www.darlingtonsafeguardingboards.co.uk/children-safeguarding-board">http://www.darlingtonsafeguardingboards.co.uk/children-safeguarding-board</a>	
Darlington Safeguarding Adults Board	<a href="http://www.darlingtonsafeguardingboards.co.uk/adults-safeguarding-board">http://www.darlingtonsafeguardingboards.co.uk/adults-safeguarding-board</a>	

## Coleg Plas Dwbl

Provision Lead	Brad Challinor	College Principal
Designated Safeguarding Lead	Llewellyn Rees	Assistant Principal
Designated Safeguarding Deputy and SG team member	TBC	
	Louise Lewis	Head of Residential
	Christine Mathias	Education Learning Coordinator
	TBC	
Contact Reception	01994 729862	
Contact out-of-hours duty	07534 742030	
Local Safeguarding Boards		Out of hours
Children's Safeguarding	01437 764551	08708 509508
Adult Safeguarding	01437 776056	08708 509508
Mid and West Wales Safeguarding Children Board	<a href="http://cysur.wales/home/contacts-useful-links/reporting-concerns-child/">http://cysur.wales/home/contacts-useful-links/reporting-concerns-child/</a>	
Mid and West Wales Safeguarding Adults Board	<a href="http://cysur.wales/home/contacts-useful-links/reporting-concerns-adult/">http://cysur.wales/home/contacts-useful-links/reporting-concerns-adult/</a>	

## Freeman College

Provision Lead	Perdita Mousley	College Principal
Designated Safeguarding Lead	Adam Leathwood	Safeguarding Manager
Designated Safeguarding Deputy and SG team member	Perdita Mousley	College Principal
	Angie Iversen	Deputy Principal
	Sharon Allen	Head of Residential
	Ewan Keefe	Learning Engagement Manager
Contact Reception	0144 252 5940	
Contact out-of-hours duty	07812 234321	
Local Safeguarding Boards		
Sheffield Children's Safeguarding Hub	0114 273 4855 <a href="https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-andresources/referring-asafeguarding-concern-tochildrens-social-care">https://www.safeguardingsheffieldchildren.org/sscb/safeguardinginformation-andresources/referring-asafeguarding-concern-tochildrens-social-care</a>	
Adult Safeguarding	0114 273 6870	
Sheffield Safeguarding Children Board	<a href="http://www.safeguardingsheffieldchildren.org/sscb/education/policies-1">http://www.safeguardingsheffieldchildren.org/sscb/education/policies-1</a>	
Sheffield Safeguarding Adults Board	<a href="https://shsc.nhs.uk/wp-content/uploads/2016/05/Safeguarding-Adults-Policy.pdf">https://shsc.nhs.uk/wp-content/uploads/2016/05/Safeguarding-Adults-Policy.pdf</a>	

## Glasshouse College

Provision Lead	Ollie Cheney	College Principal
Designated Safeguarding Lead	Mike Claridge	Safeguarding Manager
Designated Safeguarding Deputy and SG team member	TBC	Deputy Principal
	Pauline Clarke Campbell	Centre Admissions Manager
	Agata Dokszeicz	Head of Residential
	Lindsey Greg	Shared Lives Co-ordinator
	Jack Nordhoff	Learning Engagement Manager
Contact Reception	01384 399400	
Contact out-of-hours duty	07977 174790	
Local Safeguarding Boards		Out of hours
Children's Safeguarding	0300 555 0500	0300 555 8574
Adult Safeguarding	0300 555 0500	0300 555 8574
Dudley Safeguarding Children	<a href="http://safeguarding.dudley.gov.uk/child/">http://safeguarding.dudley.gov.uk/child/</a>	
Dudley Safeguarding Adults	<a href="http://safeguarding.dudley.gov.uk/adult/">http://safeguarding.dudley.gov.uk/adult/</a>	

## Ruskin Mill College

Provision Lead	Grainne O'Reilly	College Principal
Designated Safeguarding Lead	Brendan Murphy	Head of Residential
Designated Safeguarding Deputy and SG team member	Steven Ferguson	Deputy Principal
	Ab de Bree	Shared Lives Co-ordinator
	Loretta Leggat	Learning Engagement Manager
Contact Reception	01453 837500	
Contact out-of-hours duty	07977 474747	
Local Safeguarding Boards		
Children's Safeguarding	01452 426525	
Adult Safeguarding	01452 426 868	
Gloucestershire Children Safeguarding Board	<a href="http://www.gscb.org.uk/">http://www.gscb.org.uk/</a>	
Gloucestershire Safeguarding Adults Board	<a href="http://www.gloucestershire.gov.uk/gsab/">http://www.gloucestershire.gov.uk/gsab/</a>	

## Sunfield Children's Home

Provision Lead	Graeme Cheyne	Principal
Designated Safeguarding Lead	Lotty Riggs	Head of quality assurance and safeguarding
Designated Safeguarding Deputy and SG team member	Sarah Marshall	Head of Care and Therapies.
	Val Harley	Home Manager
	Lydia Swinton	Head of Education
	Wendy Spruce	Home manager
Contact Reception	01562 882253	
Contact out-of-hours duty	07775 558961	
Local Safeguarding Boards		Out of hours
Children's Safeguarding	01905 822666	01905 768020
Safeguarding children in Worcestershire	<a href="https://ylyc.worcestershire.gov.uk/protection-from-harm/safeguarding-children/">https://ylyc.worcestershire.gov.uk/protection-from-harm/safeguarding-children/</a>	