

Safeguarding Policy And Procedure	
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Date for next review	5 th May 2017
Compliance lead	Brian Simpson (Trustee)
Agreed Policy file name	Safeguarding Policy and Procedure
Agreed policy location:	Trust website (www.rmt.org - public access) and RMT Information area\Policies and Procedures (internal access only)

POLICY:

- To create at each Trust Centre a safeguarding culture and environment where the opportunities for abuse, neglect or exploitation, and risks of radicalisation and FGM are minimised.
- To create at each Trust Centre 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.

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

- 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 RMT Centre 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.

ROLES AND RESPONSIBILITIES

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 being made about any of the Trustees, Centre leaders or designated safeguarding leads.

At each RMT Centre the Centre leader will:

- Appoint a designated safeguarding lead person (DSL) to take lead responsibility for safeguarding students. The names and contact details for the DSL at each RMT Centre are laid out in Appendix 1. DSLs have relevant expertise and are trained to local authority standards, to respond to allegations and concerns, and to collate safeguarding data.
- 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 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.
- Induct all new students, staff and volunteers with safeguarding information and procedures.
- 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.
- Undertake risk assessments 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.

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 mate 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, or any other safeguarding, radicalisation or FGM concerns to the DSL at their Centre.

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.

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 radicalised.

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 - Preserve Evidence

Where there are suspicions that a crime may have taken place the Police should be contacted and forensic and other evidence should not be contaminated.

Preserving forensic evidence includes:

- disturbing a 'scene' as little as possible, sealing off areas if possible
- not removing victim's clothing
- discouraging washing/bathing
- not handling items which may hold DNA evidence
- putting any bedding, clothing which has been removed, or any significant items given to you (weapons etc.) in a safe dry place.

Other evidence can be obtained, or not contaminated by:

- not interviewing the victim or potential witnesses
- not alerting the alleged perpetrator
- making a note of your observations in relation to the condition and attitude of the people involved and any actions you have taken.

3 - 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 that the DSL or the Centre leader may be a perpetrator or involved in some way, contact the RMT Trustee lead for safeguarding (see Appendix 1 for contact details) 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.

The Safeguarding Process:

You see or hear something which suggests that abuse has taken place or that someone is, or may be, at risk of harm.

Harm can be to a person's physical or emotional wellbeing, or to their development.

Is there an immediate need for medical attention, has there been a crime, or is there immediate danger?

If so, deal with that by providing first aid, contacting emergency services and/or alerting others to ask for support.

If an allegation or disclosure has been made or you are not clear what has happened, ask only those questions you need to in order to clarify the situation and gather relevant facts

*Good questions are:
Tell me about...
Explain to me...
Describe...*

Report the situation to the DSL

*Do this as soon as possible, at least within two hours.
Describe what you have seen and heard, what you or others have done, and what the student's views are*

Record the incident.
If it is not immediately possible to use an electronic or paper safeguarding report, please keep any records you make even when transferred to the computer

*Be factual and objective, describe actions and conversations.
Include timescales*

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 at least bi-annually.

USEFUL REFERENCES: related legislation/ policies/procedures/protocols

RELATED DOCUMENTATION	Found at
Bullying	https://www.gov.uk/government/publications/preventing-and-tackling-bullying
Care Act and Safeguarding	http://www.scie.org.uk/care-act-2014/safeguarding-adults/
Channel Duty Guidance HM	https://www.gov.uk/government/uploads/system/uploads

Government	/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf
Keeping Children Safe in Education DfE 2015	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Keeping learners safe, Welsh Government 2015	www.gov.wales/topics/educationandskills/.../keeping-learners-safe/?lang=en
Mental Capacity Act	http://www.justice.gov.uk/protecting-the-vulnerable/mental-capacity-act
PREVENT Strategy HM Government	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf
Safeguarding Children, Welsh Government 2007	www.wales.gov.uk/pubs/circulars/2007/nafwc1207en.pdf?lang=en
Sexual exploitation	https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited
Types of abuse	https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/
When and how to share information	https://www.gov.uk/government/publications/information-sharing-for-practitioners-and-managers
Working Together to Safeguard Children HM Government 2015	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

IMPACT OF NON-COMPLIANCE FOR

Staff	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
Legislation / organisation	Prosecution/litigation, reputational damage, regulatory action

RELEVANT LEGISLATION AND GUIDANCE

- Counter-Terrorism and Security Act 2015
- Keeping Children Safe in Education (Statutory Guidance from Department for Education 2015)
- Working Together to Safeguard Children (Department for Education 2015)
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (2009)
- No secrets (Department of Health 2000)
- Sexual Offences Act 2003
- The Care Act 2014
- The Care Standards Act 2000
- The Children Act 1989
- The Children Act 2004
- 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)

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.
- **Abuse:** This is an action by another person - adult or child - and is a form of maltreatment. Someone can abuse or neglect a child or adult at risk by inflicting harm, or by failing to prevent harm and can be physical, sexual or emotional abuse. This can also be a violation of an individual’s human and civil rights by any other person. Incidents of abuse may be one-off or multiple act or omissions, and can be over a long period of time and are increasingly happening online.
- **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 RMT Centres 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.
- **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.
- **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:** work which enables students to retain independence, wellbeing and choice and to access a life that is free from abuse and neglect.
- **Student:** any pupil, student or service user who is on the roll of any of the RMT Centres.
- **Ruskin Mill Trust:** (RMT or ‘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 Centres located across the UK.
- **RMT Centre:** Argent College, Brantwood Specialist School, Clervaux, Coleg Plas Dwbl, Freeman College, Glasshouse College, Ruskin Mill College.

APPENDIX 1: Safeguarding contacts for the RMT Centres

Each of the RMT Centres produce their own College protocol which are issued to all staff, workers and volunteers, which gives contact details for the local Safeguarding Officers and Safeguarding Managers.

Argent College: Designated Safeguarding Lead: Jo Chapman
Designated Safeguarding Deputies: Oliver Cheney
Contact numbers: 07812234351 (Jo)
Birmingham External Services:
Safeguarding Children - 0121 303 1888
Out of Hours Service - 0121 675 4806
Safeguarding Adults Access Point - 0121 3031234
Out of Hours Service - 0121 675 4806

Brantwood Specialist School:

Designated Safeguarding Lead: Christine Haylett
Designated Safeguarding Deputies: Debra Dawson, Mark Hughes,
Adam Leathwood, Helen Cookman
School Reception: 0114 2589062
Sheffield External Services:
Safeguarding Children Advisory Service - 0114 205 3535
Local Authority Designated Officer - 0114 273 4850
Out of Hours Service - 0114 273 4855
www.sheffieldscb.proceduresonline.com/

Clervaux: Designated Safeguarding Lead: Vikki Lazenby-Walker
Designated Safeguarding Deputies: Kenny Hope, Roberto Romano
Contact number: 01325 729862
Darlington External Services
Safeguarding Children Access Point - 01325 406222
Safeguarding Adult Access - 01325 742030
Out of Hours - 08702 402994

Coleg Plas Dwbl: Designated Safeguarding Lead: Llewellyn Rees
College Reception: 01994 419420
Duty Number (out of hours): 07534 106760 or 01994 419861
Pembrokeshire External Services
Duty officer for child protection - 01437 776444
Contact centre for child protection - 01437 764551
Out of hours team - 08708 02000
Police - 0845 3300 2000

Freeman College: Designated Safeguarding Lead: Perdita Mousley
Designated Safeguarding Deputies: Adam Leathwood, Sharon Allen,
Digby Brown
College Reception: 0114 2525940
Duty Number (out of hours): 07813 234123
Sheffield External Services:
Safeguarding Children Advisory Service - 0114 205 3535
Local Authority Designated Officer - 0114 273 4850
Out of Hours Service - 0114 273 4855
www.sheffieldscb.proceduresonline.com/
Sheffield Adult Access Team - 0114 273 4908
Safeguarding Adults Service - 0114 273 6870
Out of Hours Service - 0114 273 4908
www.proceduresonline.com/southyorks/sab/

Glasshouse College: Designated Safeguarding Lead: Mike Claridge
Designated Safeguarding Deputies: Sajda Atiq, Jack Nordhoff
College Reception: 01384 399400
Duty Number (out of hours): 07977 174790
External Services:
Dudley Adult Safeguarding - 01384 818543
Children's Safeguarding
□ Brierley Hill: 01384 813000
□ Dudley, Sedgley & Coseley: 01384 813200
□ Halesowen & Stourbridge: 01384815902
Out of Hours Service - 0300 555 8574
Adult Social Care - 0300 555 0055
www.safeguarding.dudley.gov.uk

Ruskin Mill College: Designated Safeguarding Lead: Michael Poynton
Designated Safeguarding Deputies: Bernie Courts, Sofie Rasmussen
College Reception: 01453 837500
Duty Number (out of hours): 07977 174747
External Services:
Gloucestershire Safeguarding Children Board - 01452 426565
Local Authority Designated Officer (LADO) - 01452 426994
Out of hours - 01452 614194
www.gscb.org.uk
Gloucestershire Safeguarding Adults Board - 01452 426868
www.gloucestershire.gov.uk/safeguardingadults

Ruskin Mill Trust: The Trustee with responsibility for safeguarding is Brian Simpson,
who can be contacted on 07931 522565.

APPENDIX 2: TYPES OF ABUSE

Neglect: Is the ongoing failure to meet a child's or adult at risk's basic needs. It's dangerous and can result in the person suffering serious and long-term harm.

Online abuse:

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

Sexual abuse:

A child is sexually abused when they are forced or persuaded to take part in sexual activities. For adults at risk these are sexual acts in which the adult at risk has not consented or understood. This doesn't have to be physical contact, and it can happen online.

Physical abuse:

Physical abuse is deliberately hurting a child or adult at risk causing injuries such as bruises, broken bones, burns or cuts and can also involve inappropriate restraint or force-feeding.

Emotional abuse:

Children or adults at risk who are emotionally abused suffer emotional maltreatment or neglect. It's sometimes called psychological abuse and can cause serious harm.

Child sexual exploitation:

Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status.

Female genital mutilation (FGM):

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons.

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.

Institutional 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.