

Young People and Adults at Risk Safeguarding Policy Sunfield	
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Compliance lead	Trust Head of Safeguarding
Agreed Policy file name	Safeguarding Policy and Procedure
Agreed policy location:	Sunfield website RMT website (www.rmt.org - public access) and RMT

Sunfield provides an innovative and experiential education and residential provision for children and young adults aged 5 to 19 years with complex learning needs. Sunfield is made up of 5 residential homes and a school building, working with between 35-40 children and young adults. Sunfield is part of the Ruskin Mill Trust who through their Trust Lead for Safeguarding oversees the work of the DSL and the policy and practice on the site

Roles and Responsibilities

Designated staff with responsibility for safeguarding

Provision Lead	Chris Lore / Tara Gratton
Designated Safeguarding Lead	Niall Crawford, Designated Safeguarding Lead & Pastoral Manager
Deputy Safeguarding Lead	Sarah Marshall, Head of Care and Residential Manager Zoe Swords, Education Tim O'Brien, Home Manager

Contact	01562 882253
Out of hours	07775 558962
Designated Lead for Looked After Children	Niall Crawford
Local authority designated officer (LADO)	01905 846221 lado@worcestershire.gcsx.gov.uk
Worcester Safeguarding Children's Board	01905 822666 https://ylyc.worcestershire.gov.uk/protecti-on-from-harm/safeguarding-children/
Worcester Safeguarding Adults	01905768053 http://www.worcestershire.gov.uk/wsab
Worcestershire Prevent Lead	pkinsella@worcestershire.gov.uk prevent@warwickshireandwestmercia.pnn.police.uk

1. Policy Aims, Statement and Principles

.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 Sunfield 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 Sunfield 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 Sunfield 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 2020)
- Working together to Safeguarding Children (June 2018)
- Guidance for Safer Working Practice 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)

- Care Act 2014

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 2020)

.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 for the children and young adults who live and are educated on the site.

Throughout the policy and procedures, reference is made to children. This term is used to mean everyone under the age of 18.

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 2020).

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. (Care Act 2014) Some students at Sunfield 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).

Sunfield acknowledges that students with special educational needs and disabilities (SEND) 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.

Sunfield 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 2020)

Due to their day-to-day contact with students, Sunfield 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 Sunfield 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. Sunfield will act on identified concerns and will provide early help to prevent concerns from escalating.

.3 Principles

- The responsibility to safeguard and promote the welfare of its students is of paramount importance to Sunfield.
- 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.
- Sunfield 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 Sunfield.
- All Sunfield 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 Sunfield staff should be prepared to identify students 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 Sunfield Databridge system or equivalent recording system. 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 Sunfield 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 Sunfield has a safeguarding policy and procedure in place.
- This policy is available on Sunfield website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work with Sunfield.

.4 SCOPE

This policy applies to:-

- All teaching, non-teaching, support, supply, contract staff, governors, Trustees and volunteers 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.
- This policy is aligned to the safeguarding policies of those Local Children and Adult Safeguarding Boards.

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 Early Help / 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.
- Is alert to the specific needs of children in need; those with special educational needs; children who are looked after or were previously looked after; children who have a social worker; and young carers; and oversees the provision of effective pastoral support to all of those children, promoting their educational outcomes by sharing information about their welfare, circumstances and needs with teachers and other staff as appropriate.
- Works closely with pastoral support staff; the SENCo; the designated teacher for children who are looked after or were previously looked after; staff with designated responsibility for promoting children's mental health and emotional wellbeing; the ICT lead and any ICT support staff; in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies.
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraph 9-52 and Annex A of 'Keeping Children Safe in Education DfE 2020' 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 supports any staff who make a referral to Channel;
- Supports their provision(s) with regards to Sunfield'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 Sunfield 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 2020);
- 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 Sunfield with the knowledge, skills and support required to safeguarding children and adults at risk;
- Refers cases where a person is dismissed or has left Sunfield 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 and Sunfield 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 Sunfield, 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;
- informs the headteacher of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations (where the DSL role is not carried out by the headteacher).
- 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;
- Understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep children and adults at risk safe whilst they are online
- Understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding
- Promotes a 'culture of safeguarding' in which every member of Sunfield 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 Sunfield and evaluate safeguarding training;
- Provides an annual report to the Board of Trustees setting out how Sunfield has discharged its safeguarding duties;

- Ensures that the Provision Leader 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 2020).

2.3 Deputy Designated Safeguarding Lead responsibility

Every Deputy Designated Safeguarding Lead is appropriately trained to the same level as the Designated Safeguarding Lead and, in the absence of the Designated Safeguarding Lead, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the Designated Safeguarding Lead, 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 Sunfield Children's Home Limited 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 Sunfield 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 Sunfield'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 Sunfield;
4. Ensure that everyone involved with Sunfield 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 Sunfield 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 Sunfields'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, Helen Kippax, 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

Directors are responsible for holding Provision Leaders to account against their responsibilities set out at 2.5 below. Each Director shall identify best practice from within their 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, reporting 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.

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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 2020);
- 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.
- Ensures that anyone who has harmed or may pose a risk of harm to a child or Adult at Risk 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 and/or

act as a point of contact for the member of staff/volunteer against whom the allegation is made

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 Sunfield:

- 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: 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 2020) 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 the 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 Sunfield's Databridge 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, Sunfield staff 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. Sunfield recognises that abuse can take many different forms. Staff will receive training on the following issues and action will be taken if Sunfield 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.

- **Self Neglect:** Self-neglect is a behavioral condition in which an individual neglect to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.
- **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.
- **Modern Slavery:** Modern slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **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, upskirting, 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 coercion, 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.
- **Upskirting:** typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- **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.

Sunfield 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

Sunfield 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 2020 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 and share their concerns with the Designated Safeguarding Lead (or a deputy DSL).

It may become necessary to take some time with parents to understand a student's needs and circumstances in a more structured way. Children / adults at risk and families may also need support from a range of local agencies beyond the school environment. Where the school/college has identified that a structured assessment would benefit a child/adult at risk in order to determine how best to meet their needs and support their family; or where a child/adult at risk and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, Police) and her/his parents' consent, the school will use the Early Help process to identify what help the child/adult at risk and family require to prevent the needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

If early help is appropriate, the Designated Safeguarding Lead (or Deputy DSL) will generally lead on liaising with other agencies and setting up an Early Help as appropriate. Other staff may be required to work directly with students and their families and to support other agencies and practitioners in an Early Help Pathway, in some cases acting as the lead professional.

The school will keep the needs and circumstances of students receiving early help under constant review. If the situation does not improve and/or the student's parents and/or the child/adult at risk do not consent to early help, the school will make a judgement about whether, without help, the needs of the child/adult at risk will escalate. If so, the school will seek the parents' consent to a referral to a multi-agency Locality Panel in order to address the needs. Alternatively, a referral to Social Care may be necessary.

4. Procedure for reporting Concerns about a Student

4.1 Five R's model

Sunfield adopts the five R's model for dealing with concerns or disclosures regarding any student.

These are: **Recognise, Respond, Record, Report and Refer.**

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. All staff will be alert to indicators of abuse and will report any of the following to the Designated Safeguarding Lead immediately;

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 student's age/stage in development, that complete confidentiality cannot be promised.

4.1.3 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. At no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child or adult at risk, this type of behaviour could lead to the staff member being taken into managing allegations procedures.

4.1.4 Report

The member of staff who has recorded the concern, or received the disclosure, must report the concern/disclosure to the DSL, or in their absence, a Deputy DSL, immediately by completing a referral form and the Databridge system. If a disclosure is made in relation to a residential student a member of the on call team should be notified immediately. The member of staff who is on call will advise of any immediate action to be taken and then inform the DSL of any actions taken at the earliest opportunity during the next working day.

4.1.5 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 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.

4.2 Submitting referrals

All referrals relating to students 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 2020', 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. 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 Trust Head of Safeguarding or Executive Team member 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 for dealing with disclosure.

Allegations against a staff member will be assessed by the DSL, 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 DSL, Deputy DSL or Trust Head of Safeguarding will inform the LADO within 1 working day of receiving the allegation with support from HR where required, 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 Trust Head of Safeguarding or Executive Team Member/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.

Allegations made against the Founder and Executive Chair should be made directly to the Designated Officer/LADO. Where false allegations or allegations without foundation are found the case manager/investigating officer with support from HR if required 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 2020', RMT will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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 e mail help@nspcc.org.uk. Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

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 scheduled 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 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

Sunfield 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.

Sunfield 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, Sunfield 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:

- Sunfield'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.

Sunfields'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.

All staff will be made aware of the increased risk of abuse to certain groups, including children/adults at risk with special educational needs and disabilities, looked after children, previously looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, peer on peer abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping safe online.

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 2020' 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 'Keeping Children Safe in Education DfE 2020'.

All trustees / directors will be the subject of Enhanced DBS checks as defined in 'Keeping Children Safe in Education DfE 2020'.

10.2 Volunteers

Volunteers will undergo checks commensurate with their work in Sunfield 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 Trustees

Trustees will undergo DBS check (Enhanced) to include barred lists to be checked (only if the Trustee spends time within the Trust's Schools or Colleges), S128 check, prohibition of teaching check and overseas police checks if the Trustee has lived or worked abroad for 3 months or more.

10.4 Contractors

Sunfield checks the identity of all contractors working on site and requests DBS checks where appropriate. Contractors and any of their staff 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;
- keep records in a meticulous chronological order, either on paper or electronically
- 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.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of the children. Keeping Children Safe in Education (DfE 2020) states clearly that "Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children".

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.

The DSL will maintain an overview of all students accessing the off site provision and will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns.

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 2020'.

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 and Ofsted. 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. Students who may be particularly vulnerable

Some students are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's/adult at risk personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all our students receive equal protection, we will give special consideration to children who are:

- Young carers
- Affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- Asylum seekers
- Looked after by the Local authority or previously looked after
- In receipt of support and services from a social worker
- Vulnerable to being bullied or engaging in bullying behaviours
- Living away from home or in temporary accommodation
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race,

- ethnicity, religion, disability or sexuality
- At risk of child sexual exploitation (CSE) and/or child criminal exploitation
- At risk from or are involved with serious violent crime
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children/adults at risk and parents/carers with communication needs.

19. Safeguarding Students with Special Educational Needs, disabilities and or mental health needs

As outlined in Keeping Children Safe in Education 2020, 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.

Staff are trained to manage these additional barriers to ensure students are appropriately safeguarded; and are aware that mental health difficulties can, in some cases, be an indicator that a child or adult at risk has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a students mental health to the Designated Safeguarding Lead as with any other safeguarding concern, recognising that mental health concerns may be an outcome and/or indicator of wider safeguarding issues and concerns.

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 students to ensure they are able to articulate their concerns. These include emotion cards, social stories, 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.

20. 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 Sunfield to use reasonable force to safeguard students. 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 student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a student 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, 2020, 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 Sunfield authorise the use of corporal punishment nor condone the use of inappropriate force.

Sunfield 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.

21. 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.

22. Attendance

Sunfield 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 Sunfield works in partnership with the Local Authority when patterns of absence give rise to concern.

23. Young People Missing from Education

Sunfield 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.

Sunfield will inform the local authority that we plan to take a child off roll when they leave school to be home educated; move away from the school's location; remain medically unfit beyond compulsory school age; are in custody for four months or more (and will not return to school afterwards); or are permanently excluded.

Sunfield will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the Local Authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Sunfield will ensure at least 2 emergency contact details are held for each student.

24. Young People Who Are Looked After

The most common reason for young people becoming looked after is as a result of abuse or neglect. Sunfield 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.

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

25. 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 2020' 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.

26. Helping Students to Keep Themselves Safe

'Keeping Children Safe in Education DfE 2020' 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.' Students are taught to understand and manage risk through College/school 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 students 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 students and they are encouraged to speak to a member of staff of their choosing about any worries they may have.

When concerns are identified, staff will always speak to students and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm. The DSL will also need to consider the Fraser guidelines in making a judgement about whether or not to respect a young person's request not to inform his/her parents/carers.

N.B. Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity involving under 13-year olds will therefore be referred to the Police.

27. 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 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.

Technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and adults at risk and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.

The breadth of issues within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour. Many students own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

RMT is unable to filter activity on devices not owned by the RMT. Parents may find it useful to refer to <https://www.internetmatters.org/blog/parental-controls/broadband-mobile/> for guidance on putting some restrictions in place to keep children safe online.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risks online in the same way that they notice and report offline concerns. Sunfield has appropriate filters and monitoring systems in place to protect children and adults at risk from potentially harmful online material.

26.1 Bullying, Peer on Peer Abuse and Harmful Sexual Behaviour

Young people can abuse other young people. This is generally referred to as peer on peer abuse and can take many forms. It is most likely to include, but not limited to:

- Bullying (including cyberbullying)

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence and sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim
- Gender based violence
- Sexting (also known as youth produced sexual imagery);
- Initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- Prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

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 anti-bullying procedures are deemed to be ineffective, the DSL will consider implementing early help or safeguarding procedures.

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 Sunfield 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.

Sunfield 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.

26.2 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.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement; criminal or abusive behaviour by young people such as sexual abuse, extortion or threats; malicious conduct arising from personal conflicts; coercion; an imbalance of power, e.g. an older student pressurising a younger or vulnerable student to create and share an indecent image; or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns and recorded on Sunfield's Databridge 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 or Social Care;
- Sanctions in accordance with the behaviour policy; and/or
- Support for students to prevent re-occurrence.

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the provision is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Social Care to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

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.

Viewing the imagery - adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student.

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

26.3 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 including live streaming. 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 discipline) advice should be obtained from DSL/D; and/or
 - Report it to the police (if the material is of such seriousness).

26.4 Sexual Exploitation of Young People (Child Sexual Exploitation) and Criminal Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. Child criminal exploitation (CCE) is a form of abuse. Both occur where 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 and/or criminal activity.

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.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

Criminal exploitation of children can involve force and/or enticement-based methods of

compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

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.

The school teaches students about consent and the risks of sexual and criminal exploitation in the PSHE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The student 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 trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Social Care and or Police.

26.5 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of “deal line”.

Exploitation is an integral part of the county lines offending model with children and adults at risk exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children and adults at risk can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

For further information see:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf).

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 Domestic Violence

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over

who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to;

- Psychological;
- Physical;
- Sexual;
- Financial;
- Emotional.

All young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about students being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

26.10 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.

29. Safeguarding online learning and communication between staff and students

Where RMT staff are delivering lessons online or virtually (e.g. to students unable to attend school due to COVID-19 or ill health), all will be delivered in accordance with RMT Young Person and Adult at Risk Safeguarding Policy, Code of conduct and acceptable use of ICT policies. This will ensure that RMT filtering and monitoring software is enabled.

Staff will always use RMT owned devices and accounts for the delivery of online/virtual lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. Provision Leaders may randomly sample recorded lessons in order to safeguard students and staff and to ensure that policies are being followed.

When delivering online/virtual lessons on a one-to-one basis or communicating with vulnerable students who are not attending school/College via video chat, staff will speak to parents/carers before lessons/conversations commence and when they finish before logging off.

RMT will request and obtain written consent from parents/carers including consent to record lessons and video conversations before staff communicate with children online.

It is important that all staff who interact with children/adults at risk online continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

RMT will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Online/virtual lessons should be timetabled and the headteacher/Principal or DSL will be able to drop into any virtual lesson at any time - the online version of entering a classroom for student welfare and safeguarding purposes. Staff delivering online/virtual teaching will be expected to display the same standards of dress and conduct that they would when working face to face in school, modelling appropriate behaviour and presentation to students and parents.

Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with children online, particularly where

webcams are used:

- a. Staff and students must be fully dressed and wear suitable clothing, as should anyone else in the household.
- b. Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what can be seen in the background and whether it would be appropriate in a classroom/teaching environment. This includes photographs, artwork, identifying features, mirrors etc.
- c. Staff will ensure that resources and videos used are age appropriate - the student may not have support immediately to hand at home if they feel distressed or anxious about content.
- d. Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
- e. Language must be professional and appropriate, including that used by any family members in the background.
- f. Staff must only use platforms specified by senior managers and approved by RMT

Staff members delivering lessons or communicating with students online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the student and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

If a staff member believes that a student or parent is recording a lesson or conversation without prior consent, the lesson will be ended or the student will be logged out immediately.

In rare and exceptional circumstances where staff urgently need to contact a pupil or parent by telephone and do not have access to a school-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the pupil and/or parent is not able to identify the staff member's personal contact details.

30. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors both outside home environments and outside school or college; and/or can occur outside the school or college. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur.

Contextual safeguarding means that assessments should consider wider environmental factors present that are a threat to safety and/or welfare. Staff will listen to students and be vigilant about any signs or indicators that would suggest students may be at risk in the community and will share intelligence with the Police in order to prevent harm.

The school/college will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

31. 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.

Schools and Colleges have a mandatory duty to report to Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

32. Students with a social worker

Sunfield recognises that when a student has a social worker, that is an indicator that she/he may be more vulnerable to harm than others as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

Sunfield will take those issues and needs into account when making plans to support students who have a social worker.

32.1 Care leavers

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

33. Searching, Screening and Confiscation

Where necessary, searching, screening and confiscation will be used to safeguard young people. RMT adheres to 'Searching, Screening and Confiscation: Advice for Schools' (May 2018)

In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves.

34. 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 2020)
- 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 Section 5b (as inserted by section 74 of the Serious Crime Act 2015)
- Dealing with Allegations of Abuse against Teachers and Other Staff (2012)
- Information Sharing (2018)

ADDITIONAL LEGISLATION AND GUIDANCE RELEVANT TO WALES AND SCOTLAND

- 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)
- 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

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 Government	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf
Keeping Children Safe in Education DfE 2019	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
Children Missing From Education	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_statutory_guidance.pdf
PREVENT Strategy HM Government	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf
Safeguarding Children, Welsh Government	www.wales.gov.uk/pubs/circulars/2007/nafwc1207en.pdf?lang=en
Safeguarding Adults, Welsh Government	https://socialcare.wales/resources/wales-interim-policy-and-procedures-for-the-protection-of-vulnerable-adults-from-abuse
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 2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
Female Genital Mutilation	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_FINAL.pdf
Forced marriage	https://www.gov.uk/guidance/forced-marriage

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, Clervaux Garden School, 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.