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**RNC Policy: Safeguarding and Child Protection Policy and Procedure**

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| Responsibility: | Director of Student Support Services |
| Reviewed by: | Director of Student Support Services/SMT |
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| Other relevant policies and reference documents - held on the RNC Intranet: [Policies, Procedures and Resources - Home (sharepoint.com)](https://rncac.sharepoint.com/sites/policiesproceduresresources)   * Prevent Strategy and Duty * Equality, Diversity and Inclusion Policy * Acceptable Use Policy * E-Safety Policy * Bring Your Own Device (BYOD) Policy * Recruitment & Selection Policy * DBS Policy * Guidance for Safer Working Practice for Staff who Work with Children and Young People * Staff Code of Conduct * Student Anti-Bullying & Harassment Policy * Whistle Blowing Policy * Missing Student Policy * Student Substance Misuse Policy * Student Behaviour Policy * Child Exploitation - Introductory Information * Female Genital Mutilation - Introductory Information * Faith Abuse - Introductory Information * Forced Marriage - Introductory Information * Gender Based Violence - Introductory Information * Sexual violence and sexual harassment - Introduction Information * Teenage Abuse - Introductory Information * Trafficking and Modern Slavery - Introductory Information * Fabricated and Induced Illness - Introductory Information | |
| **Commitment Statement**  RNC is committed to the fundamental values of equality, diversity and inclusion, which creates a supportive environment for all members of our community to live, work and study. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and to eliminate discrimination to other equality groups related to age, sexual orientation, gender identity, marital or civil partnership status, pregnancy or maternity and religion or belief. We believe that safeguarding has paramount importance and RNC recognises its responsibility and duties within the Government Prevent Strategy to be aware of and where appropriate act to ensure the safety of all students from radicalisation and extremism.  This document is available in alternative formats on request. If you think RNC can improve the fairness of this policy please contact the author who has responsibility for the review and update. | |

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**For a Definition of Terms and Acronyms contained within this policy please reference Appendix 1**

**Safeguarding and Child Protection Policy**

All staff and volunteers at RNC share an objective to help keep young people and vulnerable adults safe. We believe that the safeguarding of all RNC students has paramount importance and we have a zero tolerance of abuse and other harmful behaviour. RNC recognises its responsibility to prevent unsuitable people working with children and is committed to ensuring safer recruitment of staff and volunteers. In line with the Counter-Terrorism and Security Act 2015, RNC recognises its responsibility within the Prevent Duty to be aware of and, where appropriate, act to ensure the safety of all students from radicalisation and extremism.

We believe in creating a supportive environment that enables students to be able to speak out, and that staff should be empowered to utilise professional curiosity, promote safe practice and challenge poor and unsafe practice.

We are committed to working with other local colleges, the Herefordshire Safeguarding Children framework and other health and social care partnerships, and accept our responsibility to apply procedures for addressing any breach.

RNC is committed to the principles and practices of safeguarding as set out in the Department for Education Keeping Children Safe in Education (KCSiE) September 2023 and Working Together to Safeguard Children 2018. We respect and value differences in race and ethnic origin, gender, disability, mental health, sexual orientation, age, religion and belief, economic and social background.

This policy and procedure is in line with the West Midlands Safeguarding Children Procedures and Safeguarding Children and Young People in Herefordshire arrangements, policies and procedures and the Herefordshire Right Help Right Time Levels of Need (RHRT LON). These documents can be accessed using the link below:

[Right Help Right Time Levels of Need Framework 2020\_1.pdf: This document replaces “Herefordshire Levels of Need Threshold Guidance (procedures.org.uk)](https://westmidlands.procedures.org.uk/assets/clients/6/Herefordshire%20downloads/Right%20Help%20Right%20Time%20Levels%20of%20Need%20Framework%202020_1.pdf) This document replaces “Herefordshire Levels of Need Threshold Guidance - *Multi agency guidance on meeting the needs of children, young people and their families in Herefordshire”* and meets the requirements of the statutory guidance in: [Working Together to Safeguard Children 2018 (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

**Procedures**

# **Staff Named Person**

1.1 RNC is required to ensure that a nominated senior member of staff holds a management responsibility for safeguarding arrangements at the College. The ‘Named Person’ will liaise with social services and other relevant agencies on safeguarding issues on behalf of the organisation.

1.2 At RNC the Named Person is referred to as the Lead Designated Safeguarding Officer (LDSO); in their absence any member of the Designated Safeguarding Officer (DSO) Team will hold this responsibility.

1.3 At RNC the LDSO position is held by the Director of Student Support Services, who has developed established working protocols to execute the requirements of the Named Person role. This member of staff reports directly to the Governing Board on safeguarding issues and no decisions relating to safeguarding are taken by the SMT without direct consultation having taken place. The College position on this would be reviewed in the event of the current LDSO ceasing employment at the College.

1.4 RNC College senior managers with responsibility for safeguarding are listed in Appendix 6.

# **Raising Safeguarding Awareness and Continuing Professional Development**

2.1 All new permanent staff members receive a Safeguarding Induction from a DSO within the first week of employment. All staff and Governors are required to complete Safeguarding and Prevent Training Level 2 annually via Smartlog. Temporary staff receive a briefing through Smartlog. The safeguarding induction includes ensuring new staff are aware of the identity of the LDSO and designated officers and the location of the following documents on training platforms.

**Safeguarding and Child Protection Policy**

Guidance to Safer Working Practices for staff who work with Children and Young People

Keeping Children Safe in education – Part 1

2.2 All staff are required to undertake annual online safeguarding training at Level 2,

New staff members who are student-facing must have attended this training within three months of commencement of employment. Safeguarding Committee members and the Safeguarding Governor are required to undertake Level 3 Safeguarding Lead Training. Governors receive annual safeguarding training and KCSiE updates and an annual safeguarding update presentation at the first Board meeting of the academic year, presented by the LDSO.

2.3 All new staff members are required to complete online Prevent training within the first three months of employment. Support will be provided to staff that cannot fully access the online Prevent training.

2.4 All volunteers are required to attend a Safeguarding Induction from a DSO; volunteers who are student facing and therefore considered to be in regulated activity must also read the safeguarding briefing in line with national and local standards.

2.5 All RNC staff receive an annual mandatory safeguarding update in the Autumn term. Staff are required to read the update in full, including any linked documents. Staff who are on long term absence leave will receive a briefing on their return to work.

2.6 Two further updates are provided to staff during the Spring and Summer terms via an all staff email (hard copies are made available for teams who do not routinely access email). The updates advise staff of College policy and procedures, how to recognise safeguarding concerns, how to report, and how the College is linked to external safeguarding authorities.

2.7 The DSO team ensure that up to date flow charts are displayed in prominent positions around College informing all students, staff and volunteers of the procedures for reporting safeguarding allegations or concerns (Appendix 2).

2.8 The Residential Management Team advise new students of the RNC Safeguarding Policy as part of their induction to College.

2.9 A representative Cross-College Safeguarding Committee meets termly to ensure that safeguarding is embedded within all organisational activities.

2.10 A member of the SMT or an appropriate external organisation will undertake an annual safeguarding audit to assure policy and procedure is embedded throughout the organisation and inform areas for improvement. The Safeguarding Committee will review the findings and if required develop an action plan. The audit and action plan documents may be shared with local authorities on request.

# **Vetting process for staff, governors and volunteers**

3.1 The RNC campus comprises of all College learning areas, halls of residences and their surrounding grounds. All College campus paid staff and volunteers may be required to work unsupervised in a regulated activity and as such are subject to full Enhanced Disclosure & Barring Service (DBS) checks including barred lists checks for Children in addition to standard vetting checks. Barred list checks for Vulnerable Adults are carried out for all student facing staff. Regulated activity is work that a person barred from working with vulnerable people/children must not do.

3.2 Within the recruitment stage, if information is disclosed on a DBS, actions will be taken in line with the College DBS Policy to determine the suitability of the candidate’s employment.

3.3 At renewal stage for existing staff, actions will be taken in line with the College DBS Policy to determine the continued suitability for employment.

3.4 Any staff who have not received an Enhanced DBS by their start date must have an appropriate risk assessment in place and on file. The staff member will need to work under constant supervision until an Enhanced DBS has been received.

3.5 Reference request letters specifically ask for information relating to any known reason why the person should not be employed to work with young people or vulnerable adults. The letter also includes the statement 'there should be no material mis-statement or omission relevant to the suitability of the applicant’.

3.6 The RNC HR Department will first internally verify the reference and ensure that any discrepancies or anomalies will be followed up by externally verifying the reference, should this be required.

3.7 Written records of interviews are stored on successful applicants' employee files, and unsuccessful applicants’ interview sheets are stored for 6 months.

3.8 Essential qualifications are routinely checked for every successful applicant. The requirement for a full employment history is made clear on the RNC application form and any gaps are either discussed at interview stage or subsequently followed up by the HR department.

3.9 RNC ensures the reference contact provided is appropriate to the role applied for and checks the reasons previous employment ended.

# **Safeguarding Measures for Under 18 Residential Students**

4.1 We aim to place under 18 students in the same accommodation, Campbell Hall. If students are due to turn 18 within a short space of time after starting at RNC, we may place them in other halls. The under 18 safeguarding protocol will be applied to any halls that under 18s are residing in.

4.2 Under age consumption of alcohol is prohibited in the under 18 hall of residence and across campus for all under 18s.

4.3 Under 18 students are required to abide by the night-time signing in rules, set out in the Student Handbook.

4.4 The College recognises the need for students to have contact with family and friends. Currently we allow known visitors in the halls of residence. Staff will support students to identify safe ways to maintain contact with family and friends.

4.5 Under 18 students requiring medical attention will be accompanied by a member of RNC staff where requested. The young person must give consent for the member of staff to be present during any discussions between the student and the medical advisor.

4.6 All RNC students are made aware of the Acceptable Use, Bring Your Own Devices, Computing and IT Systems and Resource policies. They also attend an induction focused on appropriate use of electronic communication equipment and e-safety.

4.7 Written parental consent is required for all under 18 students for off-site activities, medical treatment and any overnight absences.

# Unexpected safeguarding incident

5.1 An unexpected safeguarding incident is an incident that occurs with no prior safeguarding concerns.

5.2 If an unexpected safeguarding incident occurs within College, staff should deal with any emergency care/first aid primarily. Once the student is safe, the DSO on duty should inform the LDSO and ensure that the incident is reported to the MASH team (telephone number in section 14 of this policy).

# Early Help

6.1 When concerned about the welfare of a child, staff should always act in the best interests of the child. If there are any concerns about a child’s welfare, staff should act on them immediately by contacting one of the DSO Team.

6.2 Any child may benefit from early help. College staff should be particularly alert to the potential need for early help for a young person who:

* is disabled and has specific additional needs
* has special educational needs (whether or not they have a statutory Education, Health and Care Plan or equivalent)
* is a young carer
* is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
* is frequently missing/goes missing from college care or from home
* is at risk of modern slavery, trafficking or exploitation
* is at risk of being radicalised or exploited
* is in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
* is misusing drugs or alcohol themselves

6.3 Staff should not assume a colleague or another professional will take action and share information with the DSO Team that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

6.4 On receipt of information the DSO Team will then consider the following options:

* managing any support for the child internally via the College’s own pastoral support processes;
* an early help assessment

or

* a referral for statutory services

6.5 The LDSO will lead when early help is appropriate, liaising with other agencies and setting up an inter-agency assessment accordingly. In the LDSO’s absence, the DSO will complete this.

# Information Sharing

7.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people.

7.2 Within this policy RNC provides clearly set out guidance for staff to follow regarding the processes and the principles for sharing information internally.

7.3 The DSO team will always work to the Government guidance:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

7.4 Security of information sharing must always be considered and should be proportionate to the sensitivity of the information and the circumstances.

7.5 The College considers it a reasonable request that any member of staff asked a question relating to the safeguarding of students answers openly and honestly

# Child-on-child abuse

The College Student Code of Conduct clearly states that child on child abuse of any kind within the College community will not be tolerated. This is reinforced at induction and throughout the academic year via tutorials and pastoral support within the residential provision.

Child on child abuse can take a variety of forms, such as:

* sexual violence and sexual harassment.
* physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
* interfamilial violence or abuse (e.g. between siblings)
* sexting (also known as youth produced sexual imagery)
* cyberbullying – which is the act of online bullying over social/gaming/ online communication platforms
* upskirting – which is the act of taking a photograph underneath a person's skirt without their consent.
* initiation/hazing type violence and rituals

Allegations of child on child abuse, dependant on the nature, will be dealt with either within the Student Disciplinary Procedures

or

if relating to sexual violence, harassment or sexting under sections 7 and 8 of this procedure taking due regard of the KCSIE 2023 guidance on sexual violence and sexual harassment between children in schools and colleges.

# Serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime.

These may include:

* increased absence from school,
* a change in friendship or relationships with older individuals or groups,
* a significant decline in performance,
* signs of self-harm or a significant change in wellbeing,
* signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Advice for schools and colleges is provided in the Home Office’s [‘Preventing youth violence and gang involvement’](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf) and its ‘[Criminal exploitation of children and vulnerable adults: county lines’](https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines) guidance.

# LGBT students

10.1 The college aware that whilst a student being LGBT is not an inherent risk factor for harm, children and young people who are LGBT can be targeted by other children/young people. In some cases, a child/young person who is perceived to be LGBT can also be targeted.

10.2 The College will ensure that there is a safe space for LGBTQIA+ students to speak out and raise concerns in order to reduce additional barriers faced.

# Female Genital Mutilation

Whilst all staff should speak to the Designated Safeguarding team with regard to any concerns about Female Genital Mutilation (FGM), there is a specific legal duty to report this. If a member of staff, in the course of their work at RNC, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the member of staff **must** report this to the police.

# Online Safety

Children must be safeguarded from potentially harmful and inappropriate material. The RNC E-Safety policy which can be found in the RNC Policy Libraryensures that RNC students know what to expect form us and what we expect of them when accessing online materials.

We have a filtering and monitoring system in place and the safeguarding team, alongside the Technical Manager, have responsibility for overseeing this process and ensuring that any attempt to access harmful material online is challenged.

# Responding to Protection Allegations or Concerns

Quick reference Action Guidelines for Staff Receiving Disclosure/Suspicion can be found in Appendix 3

13.1 Any member of staff or volunteer who is told of any incident or strong suspicion of abuse of a child or young person occurring in the College, or to a student of the College at home or outside the College, must report the information the same day to a DSO. **The Executive Principal must be informed immediately and kept informed of all decisions, actions and outcomes.**

13.2 If the allegation or suspicion is about a member of staff, volunteer, visitor or contractor, refer to the guidance in Section 14 of this policy.

13.3 No member of staff should investigate reports of physical or sexual abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by College staff beyond the point at which it is clear that there is an allegation.

13.4 There should be due consideration given regarding if the child or young person is ready to talk about the safeguarding concern raised, and whether they actually recognise the situation as harmful. For example, a student may be worried or embarrassed to talk about what is happening/has happened due to a variety of different factors (e.g. vulnerability/disability/language barriers/sexual orientation). This should not prevent staff from having a professional curiosity and seeking support from the Designated Safeguarding team.

13.5 Any staff member to whom an allegation of abuse is made must:

* Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding ‘leading’ the student who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
* Stop asking any more questions as soon as the student has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
* With the knowledge of the student concerned (and, where appropriate, student consent) refer the matter immediately, with all relevant details, to a DSO.

13.6 Staff members must never give absolute guarantees of confidentiality to students or other staff members who wish to tell them something serious. However, they should guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken. They should guarantee that they will not tell anyone who does not have a clear ‘need to know’ and that confidentiality will be respected within the designated team.

13.7 The informing or disclosing student or staff member should be assured of safeguarding from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

13.8 Dealing with disclosures or allegations can be upsetting for individuals. The DSO Team are available to meet with staff to provide debrief and support.

# Procedures for Designated Safeguarding Officer (DSO)

The DSO, on receiving an allegation or concern of a safeguarding nature, should:

14.1 Meet with the student and seek clarification of the report or disclosure.

14.2 Ask the informing student what steps they would like taken to protect them now that they have made an allegation and assure them that the College will try to follow their wishes.

14.3 Take any steps needed to protect any student involved from risk of immediate harm whilst remaining aware of the possibility of forensic evidence.

14.4 Start a confidential Safeguarding Incident Log (Appendix 4); this timeline of contact and actions will be maintained throughout the reported case. A copy of this log must be available to the Executive Principal and be available for inspection purposes if required by the Lead Inspector or other agency representatives.

14.5 For students under the age of 18, if the nature of the allegation or disclosure is that there is potential that a crime has been committed, the DSO will report this to the Police immediately and inform the Executive Principal.

14.6 The DSO will not investigate the allegation further.

14.7 For all disclosures the DSO will refer the matter within 24hrs to the Herefordshire Multi Agency Safeguarding Hub (MASH). In some circumstances this referral will be made to the Children’s Social Care Team and Police force in the young person’s home area.

Herefordshire MASH team   
Telephone: 01432 260 800 (last checked September 2023)

Emergency Duty Team (currently being covered by Worcester County Council)  
Telephone: 01905 768 020 (last checked September 2023)

Weekdays after 5.00 pm  
Friday 4.30 pm – Monday 9.00 am

Police

Telephone: 101

14.8 The DSO will follow the advice from the Police or MASH of any necessary next steps in relation to:

- informing a student's parents/guardians/carers

- medical examination or treatment of the student

- immediate safeguarding measures that may be needed for a student who has been the victim of abuse, a student who has given information about abuse or a student about whom an allegation has been made

- referral to other appropriate agencies, for example the Forced Marriages Unit

14.9 The DSO will inform the student and/or the person who made the initial allegation of what the next steps are to be, having been advised of these by the Police, MASH or Children’s Social Care Referral Team or other relevant agency.

14.10 The DSO will take any necessary steps for the longer-term safeguarding and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking their wishes into account.

14.11 The DSO will take any necessary steps to protect and support a student who is alleged to have abused another.

14.12 The DSO will ensure that any student being interviewed by the Police has a supportive member of staff (appropriate adult) of their own choice within available staff resources to accompany them if this becomes necessary.

14.13 The DSO will ensure the notification of external bodies such as the sponsoring authorities.

14.14 The DSO will ensure the cooperation by the College in any subsequent investigation by the Social Services, Police or other relevant agency.

14.15 The DSO will oversee arrangements, where feasible, for any student who has been the subject of abuse to receive any necessary continuing counselling and support.

# Allegations of Abuse of Students by Staff, Volunteers, Visitors or Contractors

15.1 All allegations of abuse of students by staff, volunteers, visitors or contractors will be taken seriously and treated in accordance with RNC policies, local safeguarding procedures and national guidance. These procedures will be used in respect of all cases in which it is alleged that a member of staff or a volunteer at RNC has:

* behaved in a way that has (or may have) harmed an under 18 student or students
* possibly committed a criminal offence against or related to an under 18 student or students or
* behaved towards an under 18 student or students in a way that indicates they may pose a risk of harm to children.

15.2 Where allegations of abuse are made against a member of staff, volunteer, visitor or contractor, the DSO Team will notify the Executive Principal immediately. In cases where members of the designated team are the subject of the allegation any staff member receiving the allegation must pass on the allegation directly to the Executive Principal.

15.3 In cases where the Executive Principal is the subject of the allegation, the Lead Designated Safeguarding Officer will contact the Designated Safeguarding Governor (see Appendix 6).

15.4 The senior member of staff or Governor assigned to oversee the allegations will report without delay to the MASH team (see contact details above) and seek a Local Authority Designated Officer (LADO) referral.

15.5 The MASH team will advise on three strands in the consideration of an allegation:

(i) a Police investigation of a possible criminal offence

(ii) enquiries and assessment by MASH team about whether the student is in need of protection

(iii) consideration of disciplinary action in respect of the individual, which includes guidance for suspending a member of staff/volunteer.

15.6 A member of the Senior Management Team, if necessary and following advice from the MASH team, will suspend from duty, pending investigation, any member of staff who is alleged to have abused a student or students.

15.7 The RNC HR department will ensure that the person who is the subject of the allegation is informed of the progress of the case.

15.8 RNC will ensure that every effort is made to maintain confidentiality and guard against unwanted publicity.

15.9 RNC will ensure that any allegation will be followed through, regardless of whether the subject of the allegation chooses to resign or cease to provide their services.

15.10 RNC will not enter into so-called ‘compromise agreements’ (by which the person agrees to resign and the College agrees not to pursue disciplinary action and both parties agree a form of words to be used in a reference) in relation to any allegations of abuse.

15.11 RNC will work under the direction of the LADO and engage fully with strategy discussions and information sharing protocols.

15.12 If the allegation is substantiated RNC will ensure that the Independent Safeguarding Authority is notified (usually via the LADO).

15.13 If the outcome concludes that a person who has been suspended can return to work RNC will consider how best to facilitate this, which will include consideration of supportive measures to deal with possible stress issues.

15.14 At the conclusion of the case RNC SMT and Governors will consider the lessons of the case and how they should be acted upon.

15.15 If an allegation is determined to be false the LADO should refer the matter to the MASH team to determine whether the child concerned is in need of services or may have been abused by someone else.

15.16 In a case where the LADO or the Police provides information to the college in regard to a criminal conviction or a member of staff being on the barred list, actions will be taken in line with the College Disclosure and Barring Service Checks Policy.

15.17 In a case where a low-level concern is reported or a concern that does not meet the harm threshold for reporting to MASH, Police or the LADO, the College will apply appropriate policies and protocols to deal with the concern raised. Please see Appendix 1 for the definition of a low-level concern.

# Internal Case Review

16.1 In all cases where there has been a requirement to make a referral to MASH, the LADO or report to the Police an internal case review will be held no later than 6 weeks after the referral has been made.

16.2 A minimum of two members of the Senior Management Team will meet with the Director of Student Support Services and relevant members of the Designated Safeguarding Team.

16.3 The relevant DSO will provide a full written report to the identified members of SMT which will include all activity, decision making rationale and actions as detailed in the Safeguarding Log, no later than five days prior to the date of the review meeting.

16.4 The intended purpose of the case review is to provide a vehicle for reflection, identify good practice, provide challenge where required in relation to decision making and to make recommendations for changes to procedure and policy as required.

16.5 The outcome and any recommendations will be reported to SMT and the College Safeguarding Committee.

# External Work Placements for Under 18 students

17.1 Responsibility for the students’ welfare always remains with the College.

17.2 The College has a Work Placement Co-ordinator who has received Safeguarding training.

17.3 The Work Placement Co-ordinator is responsible for organising and confirming that a pre-placement visit is undertaken, for those placements organised by RNC, to ensure the suitability of the placement and of the student for the placement, unless the student has organised the work placement themselves in their home area or is placed with a government organisation with parental agreement in place.

17.4 Transportation for work placements arranged by the College is always with approved taxi companies whose drivers have enhanced DBS in place. The college also uses company cars to transport students to workplaces where necessary,

17.5 The Work Placement Co-ordinator will put in place reporting systems for the student and employer.

17.6 The Work Placement Co-ordinator is responsible for agreeing with the student and employer a monitoring process for the duration of the placement.

17.7 The Work Placement Co-ordinator is responsible for providing a Placement Safeguarding Briefing sheet for the student and employer which clarifies safeguarding responsibilities and who to contact in the event of any concerns.

17.8 The Work Placement Co-ordinator will ensure that the employer appoints a Placement Supervisor. The Supervisor will be required to sign their understanding and agreement to work within the guidance stated within the Placement Safeguarding Briefing which is in line with RNC Safeguarding Policies and Procedures.

17.9 Enhanced DBS checks are not required for short-term placements i.e. half day/full day a week if lasting one term or block placements of up to three weeks.

The above steps should be taken in relation to all work placements.

17.10 Long term placements require the Placement Supervisor to receive a safeguarding briefing.

17.11 The LDSO must be consulted when consideration is given to a work placement with a sole trader, or if there is a residential component required.

# Work Placements at RNC

18.1 Requests for work placements at RNC from external bodies or individuals should be referred to:

* LDSO for placements within Student Support Services and the Learning Directorate (with the exception of Mobility placements)
* Teacher in Charge of Skills for Life for Mobility placements
* Director of Business and Enterprise for placements within commercial areas of the college
* Executive Principal for placements within Marketing, Registry and Fundraising
* HR Department for placements within Finance, HR and Estates

18.2 The HR Department should be informed of all placement requests to enable them to track procedural compliance.

18.3 The TiC or Manager for the area where the placement is requested will decide on the suitability of the placement.

18.4 RNC will appoint a Placement Supervisor who will meet with the school/college who made the request for the placement to agree expectations.

18.5 Individuals requesting a work placement will be required to provide an Enhanced DBS or have an appropriate risk assessment in place and filed with HR.

18.6 The RNC Placement Supervisor will ensure that the Placement Organiser and individual on placement receive the RNC briefing sheet (Appendix 5).

18.7 The Placement Supervisor will provide the HR department with a signed copy of the briefing sheet (Appendix 5).

18.8 The Placement Supervisor will be responsible for ensuring compliance with expectations set out in Appendix 5 and report any concerns without delay to their TiC or Manager.

# What staff should do if they have concerns about safeguarding practices within College

19.1 All staff and volunteers, visitors and contractors should feel able to raise concerns about poor or unsafe practice and potential failures in the College Safeguarding Policy or Procedures and know that such concerns will be taken seriously by the Senior Management Team.

19.2 Appropriate whistleblowing procedures are in place for such concerns to be raised with the Senior Management Team. This policy is located in the policies section of the college SharePoint.

19.3 Where a staff member feels unable to raise an issue with the Senior Management Team or feels that their genuine concerns are not being addressed, they may contact the Safeguarding Governor.

19.4 Alternatively other whistleblowing channels are open to them:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection internally. Staff can call 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](file:///C:/Users/emma.grobb/AppData/Local/Microsoft/Windows/Temporary%20Internet%20Files/Content.Outlook/NM1G8GZ9/help@nspcc.org.uk)

## **Appendix 1 - Definition of** terms **and acronyms**

**‘Child’** for the purposes of these procedures, 'child' means a young person under the age of 18.

**'Harm'** means ill-treatment or the impairment of health or development, including for example impairment suffered from seeing or hearing the ill-treatment of another;

**‘Health’** means physical or mental health;

**Emotional Abuse** is a form of Significant Harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 child 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 being imposed on children. These may include interactions that are beyond the child's developmental 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Domestic abuse** comprises of broad categories of behaviour including physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological, emotional, or other abuse. It can be prosecuted under a range of offences and it does not matter whether the behaviour consists of a single incident or a course of conduct.

Domestic abuse is rarely a one-off incident and it is the cumulative and interlinked types of abuse that have a particularly damaging effect on the victim. The ‘domestic’ nature of the offending behaviour is an aggravating factor because of the abuse of trust involved.

**Neglect** is a form of Significant Harm which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Physical Abuse** is a form of Significant Harm which may involve including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child

**Sexual Abuse** is a form of Significant Harm which 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 penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Financial or material abuse** can take the form of fraud, theft or using of the vulnerable adults property without their permission. This could involve large sums of money or just small amounts from a pension or allowance each week.

**Hate/Discriminatory abuse** of individual rights/discriminatory abuse/racial abuse is a violation of human and civil rights by any other person or persons.

**Significant Harm** the Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Significant Harm is any physical, sexual, or emotional abuse, neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act 2002 so that it may include, for example, impairment suffered from seeing or hearing the ill-treatment of another.

There are no absolute criteria on which to rely when judging what constitutes Significant Harm. Sometimes a single violent episode may constitute Significant Harm, but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

**Local Authority Designated Officer.** Local authorities should identify designated officers (referred to as the LADO) to be involved in the management and oversight of individual cases of allegations of abuse made against those who work with children.

Their role is to give advice and guidance to employers and voluntary organisations, liaise with the Police and other agencies, and monitor the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. The Police should also identify an officer to fill a similar role.

**Local Safeguarding Children Board**. The Board is made up of representatives from a range of public agencies with a common interest and with duties and responsibilities to children in their area. It has responsibility for ensuring effective inter-agency working together to safeguard and protect children in the area. The Board has to ensure that clear local procedures are in place to inform and assist anyone interested or as part of their professional role where they have concerns about a child.

**Prevent Duty** The Prevent Agenda is one of the four elements of CONTEST, the government’s counter-terrorism strategy. It aims to stop people becoming radicalised or being subjected to extremist views associated with terrorism or supporting terrorism. The College has considered the Prevent Duty and the importance of collaborative working between College staff, local authorities, Police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

**Low Level concern -** A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

* is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
* does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
* being over friendly with children
* having favourites
* humiliating children.

**Acronyms**

LDSO – Lead Designated Safeguarding Officer

DSO – Designated Safeguarding Officer

HSCB – Herefordshire Safeguarding Children Board

DBS – Disclosure and Barring Service

MASH – Multi Agency Safeguarding Hub

LADO - Local Authority Designated Officer

## Appendix 2 - Safeguarding at RNC

The Lead Designated Safeguarding Officer (LDSO) is Jessica Price (Director of Student Support Services) or in her absence, Jeremy Perrott (Student Intervention Manager), Vicky Hamilton, (Residential Manager) or Tim Morton (Residential Manager).

Action guidelines for staff receiving disclosure/suspicion

**Suspicion**

**Disclosure**

Report to DSO Team a member of whom is on-call 24hrs day during term time via the college reporting process

If a crime has been committed do not disturb forensic evidence. The Designated Safeguarding Officer will undertake a risk assessment and appropriate action and referral may or may not involve the Police

Report to DSO Team a member of whom is on-call 24hrs day during term time via the college reporting process.

U18

* Inform the young person that you have to pass on their disclosure to the DSO Team
* Take steps needed to protect any student from risk of immediate harm
* Write down everything you have seen or been told

O18

* Ask student what support they would like i.e. key worker, counsellor
* Take steps needed to protect any student or others from risk of immediate or subsequent harm
* Write down everything you have seen or been told
* Do not delay in registering concerns or suspicions of abuse
* Write down relevant FACTS
* Do not wait for your suspicions to be confirmed
* Allow time to listen to what the student has to say
* Do not stop a young person who is revealing painful events
* Do not investigate or ask leading questions
* Seek clarification

O18

Referral can only be made with informed consent or if withholding referral places others at risk

U18

Referral may be made to Social Services or Police or Ofsted or a confidential referral can be made to the NSPCC Helpline – 0808 800 5000

## Appendix 3 - Action Guidelines for Staff Receiving Disclosure/Suspicion

The Lead Designated Safeguarding Officer for adult and child safeguarding is Jessica Price, or in her absence Jeremy Perrott (Student Intervention Manager), Vicky Hamilton, (Residential Manager) or Tim Morton (Residential Manager).

**DISCLOSURE**

Allow time to listen to what the student has to say.

Do not stop a young person who is revealing painful events.

Do not investigate or ask leading questions.

Seek clarification.

**Under 18**

Inform the young person that you have to pass on their disclosure to the Designated Safeguarding Officer.

Take steps needed to protect any student from risk of immediate harm.

Write down everything you have seen or been told.

**Report** to the LDSO Jessica Price, or in her absence Jeremy Perrott (Student Intervention Manager) or Tim Morton, Vicky Hamilton (Residential Managers). A member of the Designated Safeguarding Team is on-call 24hrs a day during term time.

If a crime may have been committed do not disturb forensic evidence. The DSO will undertake a risk assessment and appropriate action and referral which may involve the Police.

**SUSPICION**

Do not delay in registering concerns or suspicions of abuse.

Write down relevant FACTS and keep in a safe place.

Do not wait for your suspicions to be confirmed.

**Report** to the LDSO Jessica Price, or in her absence Jeremy Perrott (Student Intervention Manager) or Tim Morton and Vicky Hamilton (Residential Managers). A member of the Designated Safeguarding Team is on-call 24hrs day during term time.

**Under 18** Referral may be made to MASH or Police

## Appendix 4 - Safeguarding Information and Action Log

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Student Name: | | | | DofB: |
| Date of Initial report/incident: | |  | | |
| Incident Ref No. | |  | | |
| Lead Staff: | | | | |
| Other staff involved: | | | | |
| Internal Information Sharing | | | | |
| Who | Date | | Time | Method |
| DSO Team |  | |  |  |
|  |  | |  |  |
| Executive Principal (LP) |  | |  |  |
| Directors of Learning |  | |  |  |
| Registry |  | |  |  |
| Other – please specify | | | | |
|  |  | |  |  |
|  |  | |  |  |
|  | | | | |
| External Information Sharing | | | | |
| Who | Date | | Time | Method |
| Parents/Guardians |  | |  |  |
| Social Services |  | |  |  |
| Medical Services |  | |  |  |
| Local Authority |  | |  |  |
| Other – please specify | | | | |
|  |  | |  |  |
|  |  | |  |  |
| Initial Information/Contact report | | | | |
|  | | | | |
| Staff Name: | | | | Date: |
| Initial Actions | | | | |
|  | | | | |
| Staff Name: | | | | Date: |

## Appendix 5 - Briefing Sheet for Short Term Placements at RNC

Welcome to your placement at the Royal National College for the Blind (RNC). It is our intention to ensure this placement meets your learning needs.

RNC is an independent specialist college and it is our mission to enable people who are blind or partially sighted, together with those who may have additional disabilities, achieve their full potential and integration in society.

We have a diverse range of students who are referred from all across the United Kingdom, with some international students. There is a wide age range from 16 all the way through to 25+. We expect everyone in the College, including those on placement, to behave in a way that promotes equality, values diversity and respects human rights.

RNC provides residential support for a wide range of students which includes younger people aged 16 and over, and vulnerable young adults. It is of paramount importance that safeguarding is the responsibility of everyone. It is because of this that there will be some requirements in place that protect our students and also protect you whilst on placement.

During your placement please abide by the following:-

You will be allocated a Placement Supervisor who will ensure that your activities meet your requirements and will provide you with a Health & Safety briefing.

You will be provided with an RNC or visitor badge and will be required to wear this badge throughout your placement.

You are expected to be supernumerary; that is that your presence will always be in addition to minimum staffing requirements, and to work alongside a member of RNC staff during your placement. You should take necessary steps to ensure that you are in the line of sight of RNC staff during all student contact.

You will be shown the location of the staff room and toilets and should restrict your comfort breaks to these areas.

You should restrict your presence at College to times agreed by your supervisor.

Under no circumstances can you enter a residential area unless accompanied by a member of RNC staff.

Should you have a safeguarding concern or receive a disclosure please inform your Placement Supervisor without delay. Your Placement Supervisory will pass on this information to the DSO. In the event of your Supervisor not being available please go directly to any Designated Safeguarding Officer.

Declaration: I have read the above briefing and agree to abide by these placement requirements.

Signed ………………………………………… (Learner on placement)

Date ………………………..

Signed ……………………………………….. (Placement Supervisor)

Date ……………..…………

## Appendix 6 - RNC Safeguarding Team 2023/2024

**Executive Principal -** Lucy Proctor

**Designated Governor -** Victoria Pugh

**Lead Designated Safeguarding Officer -** Jessica Price

**Designated Safeguarding Officers**

Jeremy Perrott- Student Intervention Manager

Vicky Hamilton - Residential Manager

Tim Morton - Residential Manager

**Lead responsibility for Safer Recruitment -** Human Resources

**Safeguarding Committee**

Jessica Price - Director of Student Support Services and Lead Designated Safeguarding Officer

Victoria Pugh - Safeguarding Governor

Jeremy Perrott - Student Intervention Manager

Vicky Hamilton - Residential Manager

Tim Morton - Residential Manager

Louise Brice - HR Manager

Nicola Smith - Director of Learning and Curriculum

Alisa MacLeod - Teacher - ICT

Gareth Brydon - Teacher in Charge - Mobility and Independence

Naomi Bury - tP4 Duty Manager

Clive Stewart - Estates and Facilities Manager

Debbie Ward - Nurse

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Date** | **Amendments** | **Author** |
| 1.0 | 02/17 | SMT approved | JP |
| 1.1 | 15/02/18 | Draft Annual review, minor amendment to names, document accessibility addressed, links to additional documentation added, removal of CAF information | MKJ |
| 1.2 | 12/03/18 | Approved at SMT | MKJ |
| 1.3 | October 18 | Reviewed in line with KCSinE 2018; links and contact numbers checked/updated.  Additional link to Code of Conduct and new introduction information – Sexual Violence and harassment.  2.1 – additional detail added to content of Safeguarding Induction  2.12 – addition regarding annual safeguarding audit  3. – removal of information contained with separate DBS policy  Additional Section 5. Early Help and Section 6. Information Sharing Section 7. Peer on peer abuse  Re-numbering of future sections  10.3 – inclusion of CCE  11.1 – addition of referral to MASH/LADO  Appendix 6 – updated  Approved at SMT | MKJ |
| 1.4 | October 2019 | Reviewed in line with KCSinE 2019; links and contact numbers checked/updated.  Update of DSO team information and job titles  Addition of 2.13 regarding provision of Safeguarding Summit  Inclusion of ref. to up skirting in section 7  Insert of information relating to serious violent crime  9.1 inclusion of CCE | MKJ |
| 1.5 | December 2020 | Reviewed in line KCSinE 2020  Inclusion of: Right Help Right Time Levels of Need (RHRT LON) This document replaces “Herefordshire Levels of Need Threshold Guidance - Multi agency guidance on meeting the needs of children, young people and their families in Herefordshire” and meets the requirements of the statutory guidance in Working Together 2018.  Update link to [Professionals Guidance for CPCs Mar2020.pdf (procedures.org.uk)](https://westmidlands.procedures.org.uk/assets/clients/6/Herefordshire%20downloads/Professionals%20Guidance%20for%20CPCs%20Mar2020.pdf) | MF |
| 1.6 | May 2020 | Update of Job Titles  Work Placement Coordinator changed to HR department | EG |
| 1.7 | November 2021 | Update of job titles  Full review  Approved at SMT | JP |
| 1.8 | October 2022 | Update of job titles  Full Review in line with KCSiE 2022  Local council safeguarding details reviewed and updated.  Governor training included  Roles and attendees of committee updated  Education and Training Committee agreed the policy. | JPr |
| 1.9 | September 2023 | Update of job titles  Full review in line with KCSie 2023  Local council safeguarding details reviewed  Links reviewed  Removal of 2.12  Section 10 reviewed and amended to LGBT  Section 11 added: Female Genital Mutilation  Section 12 added: Online Safety  Amendments made to Safeguarding committee members  Sentence added to Section 7 ref answering questions openly and honestly | JPr |
| 1.10 | Nov 2023 | Policy reviewed in line with review cycle.  Section 3.8 updated in relation to Recruitment requirements  Addition of ‘volunteers’ to introduction of policy  Section 2 updated to reflect training requirements and reference to Level 3 training being undertaken by Safeguarding Committee and Safeguarding Governor  Version control moved to end of document.  Policy front page updated with new headings  EIA removed for storing in separate folder with all EIAs |  |