

SAFEGUARDING POLICY

Richmond Training Academy

1. Introduction/Policy statement

1.1. Richmond is committed to ensuring that every learner is happy, safe, and secure. We want them to have the utmost confidence that our employees are trustworthy, responsible and that their safety and wellbeing is a priority.

1.2. The senior management team is aware of their responsibilities under the Health, Safety and Welfare of all learners and are determined to prevent unsuitable individuals from working with learners especially those who are vulnerable.

1.3. There are five main features to our policy:

- Ensuring we operate safer recruitment practices following the legislative document Safer Recruitment and Keeping Children Safe in Education (2020 – 2021 update).
- Raising awareness of safeguarding throughout the organisation, ensuring staff are trained and have the appropriate skills and knowledge, to support all learners effectively, helping to keep them safe.
- Raising awareness of safeguarding to all our learners ensuring that those individuals who are vulnerable are equipped with the skills and knowledge to keep themselves safe.
- Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse
- Establishing safe environments in which vulnerable individuals/groups can learn and develop

1.4. We recognise that because of the contact we have with all learners, our staff are well placed to observe the outward signs of abuse. Richmond will, therefore:

- Establish and maintain an environment where learners feel secure, and encouraged to talk and feel listened to
- Ensure learners know that there are designated staff within Richmond whom they can approach if they are concerned or worried
- Include opportunities within our ongoing assessment process and classroom delivery for learners to develop the skills they need to recognise and stay safe from abuse

1.5. Richmond recognises its responsibility for the safeguarding of young and vulnerable learners from abuse and inappropriate and inadequate care and is committed to responding in all cases where there is a concern.

2. Scope

- 2.1. This policy applies to all staff, all learners, contractors, visitors, and volunteers working on behalf of or in conjunction with Richmond Training Academy.
- 2.2. This policy is written to encompass children, young people, and vulnerable adults. Whilst the types of abuse may be different the process is managed in the same way.

3. Policy detail

3.1. Richmond Training Academy believes:

- Promote the health and welfare of children, young people and vulnerable adults by providing opportunities and the right to grow and develop in a safe environment, which includes the right to have protection from all abuse.
- Children and young people have the right to expect adults in positions of responsibility to do everything possible to protect these rights.
- All learners and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from abuse

3.2. We believe that we have a duty of care towards all learners, children, young people and vulnerable adults that are placed in our care.

3.3. To ensure the safeguarding of these individuals Richmond will:

- Have trained staff in place, all of whom have undergone an enhanced check by the Disclosure and Barring Service (DBS) to assess their suitability for working with children and young people.
- All staff have read and have awareness of the government guidance on keeping children safe in Education.
- Have mandatory Safeguarding and Prevent Training (updated annually) in place for all staff along with signposting lists, factsheets for easy access to expert advice and guidance.
- Ensure all staff, including volunteers, are aware of their responsibilities in respect of safeguarding.
- Ensure all employers, placements activities and premises are adequately insured and provide a safe and healthy learning environment that is free from hazards.
- Require all staff to agree and to abide by the company's Code of Conduct, Equality and Diversity, Harassment and Bullying, Safeguarding Policies at all times.
- Have a 'zero-tolerance policy to all forms of abuse, intimidation, and bullying (physical or emotional)

- Strictly forbid all staff, children, and young people to consume alcohol or drugs whilst undertaking any activity regardless of age or consent.
- Information sharing – whilst respecting privacy and data protection, Richmond cannot promise confidentiality in all circumstances. If we discover anything that we believe parents/guardians/social services/carers should be informed of we will do so, believing it to be in the best interest of the individual.
- Ensure safer recruitment policies are in place to ensure the safety of staff and all learners.

3.4. Vulnerable Adults

Definition of a Vulnerable Adult

- A person aged 18 years or over who is or may need community care services because of mental or other disability, age, or illness,

And

- Who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. This may include people with a learning disability, physical disability, mental ill-health, profoundly deaf, visually impaired, deaf/blind, elderly, and people with HIV/AIDS.

3.5 The Rights of an Individual

All individuals have a right to live free from abuse following the principles of respect, dignity, autonomy, privacy, and equity. Any adult at risk of abuse or neglect should be able to access public organisations for appropriate interventions which enable them to live a life free from violence and abuse.

It follows that all citizens should have access to relevant services for addressing issues of abuse and neglect, including the civil and criminal justice system and victim support services.

6. Types of Abuse

It is important to understand the types of abuse that learners could face:

- Physical Abuse – hitting, kicking, punching, choking, restraining, scalding, burning, shaking, poisoning, breast ironing/flattening, misuse of medication.
- Emotional Abuse – threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- Sexual Abuse – involves forcing an individual to take part in sexual activities, penetrative acts, involving individuals in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging individuals to behave in sexually inappropriate ways. Including – *Child Sexual Exploitation* – where children in exploitative situations and

relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them.

- Financial Abuse – theft, fraud, exploitation, pressure in connection with wills, property or inheritance, other misuse or misappropriation of property, possessions, or benefits.
- Online/Cyber Abuse – involves the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others.
- Discriminatory Abuse – bullying and harassment based on the individuals' age, sex, disability, religion, race or ethnicity or sexual orientation.
- Domestic Violence/Abuse – any incident of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality.
- Neglect or acts of omission – persistent failure to meet a child's basic physical and or/ psychological needs, failing to: provide adequate food, clothing, and shelter; protect a child from physical and emotional harm; ensure adequate supervision; ensure access to appropriate medical care or treatment; or unresponsiveness to a child's basic emotional needs.
- Modern Slavery – Slavery and forced compulsory labour and human trafficking.
- Female Genital Mutilation (FGM) – also known as female genital cutting and female circumcision, is the ritual removal of some or all the external female genitalia. FGM (unlike other Safeguarding issues) must be reported by the staff member directly to the police.
- Honour Based Abuse – where physical or domestic abuse is perpetrated in the name of so-called "honour". The honour code to which it refers is set at the discretion of relatives and those who do not abide by the "rules" are punished for disgracing the family.
- Criminal Exploitation of Children/County Lines – when gangs and organised crime networks exploit children and young people to sell drugs. Often these children are made to travel across counties.
- 'Cuckooing' – is when criminals target the home of a vulnerable person, often so they can use the property for criminal purposes such as drug dealing, hiding weapons and other criminal activities. A criminal will often befriend a vulnerable person to exploit them and use their property. This person is usually intimidated and too scared to report it to anyone. (Safeguarding Adults Board)

Richmond Training recognises that children and young people with special educational needs or disabilities can face additional safeguarding challenges.

7. Common Signs of Abuse

Physical Abuse

- Unexplained recurrent injuries or burns

- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Bald patches
- Fear of medical help or examination
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact – shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted

Sexual Abuse

- Being overly affectionate or knowledgeable in a sexual way inappropriate to a child's age
- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Over extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Regressing to younger behaviour patterns
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
 - Lack of trust or fear of someone they know
 - Starting to wet again, day or night/nightmares
 - Become worried about clothing being removed
 - Sudden drawing of sexually explicit pictures
 - Trying to be 'ultra- good' or perfect, overreacting to criticism

Emotional Abuse

- Physical, mental, and emotional development lags
- Sudden speech disorders
- Continual self-depreciation (I am stupid, ugly, worthless, etc.)
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate responses to pain
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression

Neglect

- Constant hunger

- Poor personal hygiene
- Constant tiredness
- The poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies

County Lines (National Crime Agency)

- An increase in visitors and cars to a house or flat
- New faces appearing at the house or flat
- New and regularly changing residents (e.g., different accents compared to the local accent)
- Change in resident's mood and/or demeanour (e.g., secretive/ withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia
- Changes in the way young people you might know dress
- Unexplained, sometimes unaffordable new things (e.g., clothes, jewellery, cars etc)
- Residents or young people you know going missing, maybe for long periods
- Young people seen in different cars/taxis driven by unknown adults
- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries

Cuckooing – Signs of cuckooing at the property can include:

- High numbers of cars/bikes stopping at the property for a short time
- People coming and going from the property at various times of day and night.
- Possible increase in noise / anti-social activity in and around the property
- Increase in litter outside
- Open drug dealing near the property
- Not seeing the resident of the property as often
- Damage to the property

Signs that a person could be affected by cuckooing could include:

- Not engaging with services
 - Unexplained injuries
 - Paying off debts in full with cash
 - Misusing substances
 - Appears withdrawn and fearful
 - New unidentified associates at the property or when collecting money
 - Changed appearance - either wearing expensive clothing or appearing unkempt.
- (Safeguarding Adults Board)

FGM

- Arranging a long holiday or break abroad or going “home” to visit family
- Unexpected, repeated, or prolonged absence from school
- Academic work suffering (NSPCC Website)
- Difficulty walking
- Spending longer in the bathroom or toilet
- Appearing withdrawn
- Anxious or depressed
- Asking for help, however, not being explicit about the problem due to embarrassment and being reluctant to undergo normal medical examinations

Modern Slavery

- Show signs of injury, abuse, and malnourishment
- Look unkempt, often in the same clothing and have poor hygiene
- Be under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents
- Appear scared, avoid eye contact, and be untrusting
- Be collected very early and/or returned late at night regularly
- May have inappropriate clothing for the work they are performing, and/or a lack of safety equipment
- May be isolated from the local community and their family

Mental Health

Whilst not directly a form of abuse, Richmond Training recognises that the mental health of an individual can be an indicator of abuse, neglect, exploitation, or any other form of abuse. Only a mental health professional should make a diagnosis about an individual’s mental health, but staff should be able to recognise changes in a learner’s mental health and behaviour and use this to raise any concerns about an individual’s safeguarding.

8. Sexting in schools and Colleges

Richmond Training Academy is aware of our aim to respond to safeguarding issues surrounding sexting within our educational setting.

Any concerns around sexting or the sharing of youth-produced sexual imagery should be recorded and reported to the designated person.

9. Key Responsibilities

Managing Director and Human Resources – will be responsible for ensuring that safer recruitment practice is embedded and implemented across the organisation and that all staff have received appropriate training and development.

Designated Safeguarding Lead – will be responsible for ensuring our processes and procedures for the protection of learners are robust and consistently applied and that the organisation fulfils its legal duties in compliance with the appropriate legislation. They are responsible for referring cases to the appropriate external bodies such as the Police, Safeguarding Board or Channel Programme.

Safeguarding Officers – will be responsible for supporting the Designated Safeguarding Lead, to ensure our processes and procedures for the protection of learners are robust and consistently applied and that the organisation fulfils its legal duties in compliance with the appropriate legislation. They will be required to fulfil the role of the Designated Safeguarding Lead in their absence.

All employees – have a responsibility for completing their training, familiarising themselves with the appropriate safeguarding policies and procedures and ensuring they understand their role in the promotion of safeguarding and the appropriate action should they receive a disclosure. Safeguarding and learner conduct is covered as part of the induction process for all staff.

10. Learner Entitlements

- The right to make a disclosure to any member of staff and know that the disclosure will be dealt with quickly and sensitively
- To learn in an environment free from bullying or harassment
- To be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme that the learner is completing.
- To be made aware of how to access support on personal health and safety issues either with Richmond or from outside agencies.
- To be provided with up-to-date information around personal safety issues.
- The opportunity to comment and feedback on the extent to which Richmond Training and their courses promote and maintain well-being and personal safety.
- Learn about interpersonal and communication skills that promote and establish a welcoming, safe, and respectful environment.

11. Safer Recruitment

Richmond will ensure that all staff working within a regulated activity environment will have an enhanced DBS check undertaken. The organisation will comply with best practice in the recruitment and training of its staff. All staff will undergo the appropriate vetting and barring checks for their role, and we will ensure that all staff have undertaken mandatory safeguarding training appropriate for their job role. Staff will understand the principles of safe working practices and will not put themselves in situations that compromise themselves or learners.

Staff will understand the principles and safe working practices and will not put themselves in situations that compromise themselves or learners. For example, when using mobile phones to gather evidence for assessment, ensuring images, videos etc., are deleted after use. All electronic devices should be password protected in line with the ICT policy.

12. Safeguarding against Extremism and Radicalisation

Richmond Training Academy recognises the government definition of extremism as vocal or active opposition to the Fundamental British Values, including Democracy, Rule of law, individual liberty and mutual respect and tolerance of different faiths beliefs.

Richmond Training Academy does not tolerate extremist views of any kind, whether from internal sources such as learners, staff, managers, or external sources such as employers, external agencies, or individuals. (Prevent Duty 2015)

Any prejudice, discrimination, or extremist views, including derogatory language, displayed by learners, staff or partner organisations will always be challenged and where appropriate dealt with in line with this policy.

As part of wider safeguarding responsibilities, Richmond Training staff will be alert to:

- Disclosures by the learner of their exposure to the extremist actions, views, or materials of others.
- Learner's voicing opinions drawn from extremist ideologies and narratives
- Attempts to impose extremist views or practices on others
- Learners accessing extremist material online, including through social networking sites
- Disclosures from partner agencies and employers of a learner's exposure to the extremist actions, views, or materials of others.

Richmond Training Academy will closely follow any locally agreed procedure as set out by the Local Authority and/or agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

13. Confidentiality

All employees have a statutory obligation to safeguard the confidentiality of personal information in line with the Data Protection Act 2018, and GDPR does not prevent or limit the sharing of information to keep children safe. This includes allowing practitioners to share information without consent.

Access to personal information should be on a strict need to know basis when you are sharing information.

Children and vulnerable adults of all ages have equal rights to confidentiality. Although, promises of confidentiality should not be given as the situation may develop in such a way that these cannot be honoured.

4. Associated Documents

4.1 Associated legislation, regulation, and guidance

Processes for safeguarding and promoting the welfare of children and adults at risk are now met through the Care Act 2014

This act legislates that each local authority must have its own Safeguarding Adults Board (SAB) and Safeguarding Children's Board (SCB) within strategic stakeholders are brought together to agree on policy direction and intervention.

- The Police Act 1997
- Children's Act 2004
- Public Disclosure Act 1998 (Whistle Blowing)
- Protection of vulnerable Adults Regulations 2002
- Sexual offences 2003
- Equality Act 2010
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Domestic Violence, Crime and Victims Act 2012
- Counter-Terrorism and Security Act 2015
- The Human Right Act 1998

4.2 Associated documents/guidance/policies and procedures

- Richmond's Safeguarding Procedures
- Safeguarding Report Form
- Prevent and Extremism Policy
- Data Security Policy
- Equality and Diversity Policy
- Internet Safety Policy
- Factsheets for Advice support and guidance

5. Development and Implementation

5.1 This policy has been developed following relevant legislative and good practice guidelines.

5.2 All Richmond staff will receive training on policy and procedures at Induction, for new starters, and ongoing refresher training for existing staff.

5.3 Safeguarding will form a standard agenda item at all staff 1-1's and team meetings

5.4 This policy and procedure will form part of the learner induction, handbook and will be fully integrated into all curriculum delivery following the awarding body specification.

5.5 Designated Safeguarding Lead/Officers' names, photos and contact details will be publicised and on display in classroom environments and in learner documentation.

6. Monitoring and Reporting

6.1 Richmond Training Academy management team has overall responsibility for ensuring that the organisation meets its obligations within this area. They will be responsible for the approval of relevant safeguarding policy and procedure.

6.2 All Safeguarding Incidents will be recorded and reported into Management Team Meetings.

6.3 Richmond Training Academy management team – will be responsible for ensuring that safer recruitment practice is embedded and implemented across the organisation and that all staff have received appropriate training and development.

6.4 The Designated Safeguarding Lead and Officers will be responsible for ensuring the policy and procedures for the protection of learners are robust and consistently applied and that the organisation fulfils its legal duties in compliance with the appropriate legislation.

6.5 All employees have a responsibility for completing their training, familiarising themselves with the appropriate safeguarding policies and procedures and for ensuring they understand their role in the promotion of safeguarding and the appropriate action should they receive a disclosure.

Designated Safeguarding Lead – Quality and Performance Manager

Designated Safeguarding Officers – Skills Coach / IQA / Team Leaders

7. Risk Management

7.1 This policy has been developed to mitigate the following risks:

- Failure to comply with regulatory obligations
- Changes in legislation/apprenticeship reforms
- Inadequate Policies and Processes

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Signed by a senior responsible person: Victoria Graham (DSL)