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**LOW LEVEL SAFEGUARDING CONCERNS POLICY**

Reynolds Training Academy gives guidance to staff about their duty to report low level concerns, including concerns regarding the behaviour of a member of staff towards learners (i.e., concerns that fall below the threshold for mandatory reporting to the local authority).

It is recognised by the Academy/College that:

* The method of commencing abuse often includes erosion of boundaries, slow progress to abuse
* Use of trust and authority, meeting the learner’s needs (including physical and emotional), and developing relationships with the child’s family
* There seems to be a ‘slippery slope’ of boundary violations towards abuse and that there are many stages on the slippery slope towards the breach of a boundary within a relationship

Sometimes initial infringements are part of a grooming process but at other times they are made innocently and with good intention. However, once boundaries are breached (e.g. inappropriate conversations or other communications, inappropriate physical contact, social contact outside Academy/College and favouritism) it then becomes more difficult to restore the relationship to one in which proper boundaries are respected.

* Serious case reviews in the sector repeatedly indicate that staff and learners were often aware of individual incidents of inappropriate behaviour but that there was a failure to ‘join the dots’ and take appropriate action with concerns not voiced; incidents were viewed in isolation and as too low level to require reporting
* A series of low-level concerns may cumulatively meet the mandatory reporting threshold and need to be reported to the Principal as such

The “low level concerns” guidance given by the Academy/College informs staff that:

* Whilst the concern may seem very minor and one-off, the behaviour may form part of a pattern that is putting learners at risk or (without intervention) may develop into such a pattern
* The behaviour may have been innocent, but the member of staff may need to be given guidance to understand why it was inappropriate and should not happen again

The Principal and Programme Managers conduct a regular review of reported low level concerns to ensure that:

* the concerns are being handled appropriately and proportionately
* no concerns meet the threshold of mandatory reporting to the local authority/agencies/police
* patterns of behaviour are spotted

**The Role of the Governing Body**

The Governors’ role is to:

* comply with their safeguarding duties under legislation and ensure that the policies, procedures and training in the Academy/College are effective and comply with the law at all times
* ensure that the Academy/College contributes to inter-agency working in line with statutory guidance (including “Working Together to Safeguard Children” and “Keeping Children Safe in Education”)
* ensure that the Academy/College’s safeguarding arrangements take into account the procedures and practice of Kent County Council as part of the inter-agency safeguarding procedures set up by the Kent Safeguarding

Learner Partnership:

* ensure that learners are taught about safeguarding (including on-line safety)
* nominate a Safeguarding Governor to act as the lead Governor for child protection and safeguarding issues in the Academy/College
* review this Policy and the effectiveness of its implementation annually

The Safeguarding Governor:

* is the lead Governor for child protection and safeguarding issues in the Academy/College.
* chairs the Governors’ Safeguarding Committee
* meets with the Principal and Programme Managers on a regular basis to monitor both the volume and progress of cases where a concern has been raised to ensure that the Academy/College is meeting its duties in respect of safeguarding
* keeps fully abreast of the guidance available for safeguarding
* visits the Academy/College to monitor its procedures
* liaises with professional agencies/partner agencies on issues of child protection and allegations of abuse against the Principal and/or Programme Managers and any staff members

The Governors review how learners are taught about safeguarding and wellbeing (including safe use of electronic equipment and access to the internet).

**Training**

All staff (including volunteers and temporary staff) undergo Safeguarding Training at Induction. All staff receive safeguarding updates at least annually by email or face-to-face and informally. Updates are in line with advice from Safeguarding Partnerships/memberships and include Prevent and Online Safety (as appropriate).

The Principal, in their role as Designated Safeguarding Lead, attends dedicated training courses and refresher training (including inter-agency working) at least every two years.

Designated Safeguarding Leads will be encouraged to attend appropriate network meetings and to participate in the multi-agency training programme organised by local agencies and partnerships.

The Principal maintains a record of staff Safeguarding Training.

**Records**

Brief written notes will be kept of all incidents and child protection or child in need concerns relating to individual learners. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared with other agencies as appropriate. The Academy/College will take into account the views and wishes of the learner who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous “secrets”.

All Child Protection records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Principal, Designated Safeguarding Leads and the senior managers of the Academy/College.

Child Protection records are reviewed regularly so that concerning patterns of behaviour can be spotted and appropriate interventions made.

Once places at the Academy/College for the following academic year have been accepted, Programme Managers write to the designated safeguarding lead at the respective feeder schools to request that they complete a confidential safeguarding/pastoral enquiry form and return this with the learner’s safeguarding file if appropriate.

The following list is not exhaustive, and each case must be judged on an individual basis, but information will usually be transferred where a learner:

* has a long-term medical condition which is likely to affect their ability to study
* has a diagnosed mental health condition, including depression, anxiety and eating disorders
* has been known to self-harm or to attempt suicide
* has had prolonged periods of absence from education (for whatever reason)
* has an unstable home life or no fixed abode

The Academy/College will require documentary proof as to the identity of pupils presented for admission. We will maintain accurate and up to date records of those with parental responsibility and emergency contacts.

**Complaints**

All complaints arising from the operation of this policy will be considered under the Academy/College’s Complaints Procedure.

**Review of this Policy**

The Safeguarding Policy is reviewed each year and updated as necessary. The review process includes consultation with the Academy/College’s team of Designated Safeguarding Leads and other staff regarding proposed amendments.

The Safeguarding and Prevent Team meet each quarter. Safeguarding is on the agenda of all staff meetings and an annual safeguarding report is submitted to the Governing Body.

The Governors have formally adopted this Policy and review its contents annually or sooner if any legislative or regulatory changes.

**Gemma Walker, Principal & Designated Safeguarding Lead for Reynolds Training Academy.**

RTA Low Level Safeguarding Concern Policy – reviewed 11-8-2023 / 29-2-2024