

**Safeguarding and Welfare Policy–** reviewed 16/8/23

**Child Protection and Vulnerable Adults Policy**

**Background**

This policy applies to all teaching staff and support staff of Reynolds Training Academy and to all learners.

Reynolds Training Academy recognises that it has a statutory duty and responsibility to safeguard and promote the safety and welfare of children, young people and those adults deemed ‘vulnerable’.

**Statement**

The college believes that every child or vulnerable adult deserves to be happy and secure in their activities and that their carers and/or parents feel sure that the people in charge of these activities are trustworthy, responsible and will do everything they can to keep the vulnerable adult or child safe from harm.

**Policy/Objectives**

Duties and responsibilities are defined in a wide range of legislation, including the Children Act (2004), Children and Social Work Act (2017), Apprenticeships, Skills, Children and Learning Act (2009), The Voyeurism (Offences) Act (2019), the Mental Capacity Act (2005), Equality Act 2010, the Counter Terrorism and Security Act (2015), with particular relevance to the Prevent Duty, Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, 2020), Further and Higher Education Act (1992), Keeping Children Safe in Education (2022) plus other relevant legislation. The publication of the Safeguarding Vulnerable Groups Act (2006) amended in the Protection of Freedoms Act 2012, introduced a Disclosure and Barring Service (DBS) checks for staff and others, who have defined levels of contact with children, young people and ‘at risk’ adults.

Safeguarding is a term used to denote the duties and responsibilities that those providing health, social or educational service must carry out to protect individuals from harm, including self-harm. Specifically, the Statutory Guidance for Schools and Further Education Colleges published by the Department for Education ‘Keeping Children Safe in Education’

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

states that schools and colleges should have systems and processes in place designed to:

* Ensure children are kept safe and allow for poor and unsafe practice to be

challenged.

* Foster a culture of trust between adults who work at the College and

children who attend it.

* Prevent people who pose a risk of harm from working with children and ‘at

risk’ adults.

* Contribute to effective partnership working between all those involved with

providing safeguarding services for children.

* Work with partners to provide a co-ordinated offer of early help when

additional needs of children are identified.

* Ensure staff receive appropriate safeguarding and child protection training

which is regularly updated.

* Ensure staff are effective in providing ‘early help’;
* Staff are aware and can effectively respond to the following issues:
* A child is disabled or has certain health conditions and has specific additional needs.
* Has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
* Has a mental health need.
* 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 or county lines.
* Is frequently missing/goes missing from care or from home.
* Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
* Is at risk of being radicalised or exploited.
* Has a family member in prison or is affected by parental offending.
* Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
* Is misusing drugs or alcohol themselves.
* Has returned home to their family from care.
* Is at risk of ‘honour’-based abuse such as Female Genital Mutilation or forced marriage.
* Is a privately fostered child; and
* Is persistently absent from education, including persistent absences for part of the school day.

Reynolds Training Academy incorporates the principles of the Government initiative which applies to the well-being of children and young people from when they’re born up until they reach the age of 19 and is based on the idea that every child, regardless of their individual circumstances or background, should have plenty of support throughout their life.

There are key principles to the KCSIE 2021:

* Protecting children from maltreatment.
* Preventing the impairment of children’s mental and physical 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.

Reynolds Training Academy's core training is focused on learners who are aged 16 years and over. Therefore, this policy is aimed at supporting this group regardless of gender, age, ethnicity, disability, sexuality, or religion. It is the duty of all employees, associates, and sub-contractors of Reynolds Training Academy to abide by this policy.

To ensure that, through the actions of Reynolds Training Academy, no child or vulnerable adult is placed at risk of harm or exploitation because of any learning disability, physical disability, mental ill health, or other factors such as leaving care or inadequate housing.

All members of staff have a responsibility to be aware of this policy and to report any suspicions that they might have concerning abuse. Reynolds Training Academy has procedures to:

* Identify children or adults vulnerable to risk of harm or exploitation.
* Appropriate safeguards to ensure that any service delivery has in place measures to protect those that are considered vulnerable.
* Notify the appropriate authorities should an incidence of harm or exploitation be identified.

The definition of a child is legally defined as anyone under the age of 18.

The definition of vulnerable adult is a person aged 18 or over and is defined as a person ‘who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself, or unable to protect him or herself against significant harm or exploitation’ (Department of Health, 2000).

Policy – Reynolds Training Academy will have all necessary policies and procedures in place (including the Safeguarding Policy and the Child Protection and Vulnerable Adults Policy) to ensure that children, young people and ‘at risk’ adults are:

* protected from abuse by others.
* learning and working in safe environments.

It will also ensure that:

* safe staff and volunteer recruitment practices are in place.
* staff are aware of their moral and legal responsibilities for safeguarding.
* reporting and information management procedures allow for effective monitoring of safeguarding issues.
* An effective complaints and compliments policy is in place.
* Governors undertake their strategic leadership responsibility ensuring that they comply with their duties under legislation and the law.
* Governors have a senior board level to take leadership responsibility for the college’s safeguarding arrangements.

It will also ensure that staff, volunteers and governors know how to respond to an incident of sharing nudes and semi-nudes (UKCIS 2020) – if an incident arises report it to the DSL or equivalent immediately, the codes of practice are set out in the following guidance: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/947546/Sharing_nudes_and_semi_nudes_how_to_respond_to_an_incident_Summary_V2.pdf>

 **Prevent Strategy**

Further Education provides learners with skills they will draw on for the rest of their lives. Since many people pass through Further Education at some point it is absolutely critical that institutions embody values of openness, free debate and tolerance, and promote them through the way they operate.

The Government has placed a duty on educational establishments including Further and Higher Education colleges and highlighted that they have a key role in helping prevent people being drawn into terrorism, which includes not just violent extremism, but also non-violent extremism.

The Prevent strategy has three specific strategic objectives:

* Respond to ideological challenge of terrorism and the threat faced

from those who promote it.

* Prevent people from being drawn into terrorism and ensure that they

are given appropriate advice and support; and

* Work with sectors and institutions where there are risks of radicalisation that need to be addressed.

Prevent aims to stop people being drawn into terrorism or supporting terrorism.

Reynolds Training Academy has taken measures to raise awareness within its staff and learner body by providing training and information and promoting values of openness, tolerance and facilitating free debate which is central to being a British citizen.

Reynolds Training Academy will seek to address radicalisation and extremism through its safeguarding arrangements using embedded and familiar safeguarding procedures. Radicalisation and extremism are defined as follows:

**Radicalisation:** The process by which a person comes to support

terrorism and forms of extremism leading to radicalisation.

**Extremism**: 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; calls for the death

of members of our armed forces, whether in this country or overseas.

(Evans, G. *Emerging good practice* Ofsted)

In accordance with the Prevent Strategy, the expectation is that Reynolds Training Academy will deliver in the following areas:

* Partnerships: active engagement across all levels of the College and regular contact and discussion with the regional further education prevent co-ordinators: Alamgir Sheriyar / alamgir.sheriyar@education.gov.uk / 07468 714372 and Nigel Lund nigel.LUND@education.gov.uk

(Southeast – For advice and support please contact nick.wilkinson@kent.gov.uk , County Lead for Prevent, and Head of Youth Justice and Safer Young Kent, Early Help and Preventatives Services.

* Risk Assessment: The College will address the physical management of the college’s estate, including policies and procedures for events held by staff, learners or visitors and relationships with external bodies and community groups who may use the premises. The College recognises the need to have clear and visible policies in place covering staff, learners, learning and infrastructure (use of premises), capable of identifying where learners or staff may be at risk of being radicalised and drawn into terrorism.

**Reynolds Training Academy has a Safeguarding and Prevent team**. Meetings are held on a quarterly basis throughout the year and chaired by the Designated Safeguarding Lead (DSL)/Principal. In the event of any person becoming a cause for concern, and therefore a potential risk, it may be necessary to develop an individual action plan to ensure the College can address whatever risk may have been identified.

**Staff and Governance Training**: Reynolds Training Academy will identify the appropriate training requirements across all sectors of the College in accordance with the Prevent Duty Guidance document and implement training schedules and awareness sessions in line with these requirements accordingly.

**Welfare & Pastoral care**: Reynolds Training Academy understands the duty of care to their learners and has sufficient support mechanisms in place for all learners according to their needs. Further guidance can be sought via the Principal, Deputy Principal, Programme Managers, or the Safeguarding and Prevent team.

**Safety Online**: The College has strict policies on the use of IT on the premises and uses filtering as a means of restricting access to harmful content.

**Monitoring & Enforcement**: Ofsted inspects under the Education Inspection Framework (EIF). Safeguarding is inspected as part of the leadership and management judgement and there is now an increased focus on fundamental British values and preventing extremism. The College senior management team and Governors are required to monitor this.

**Recruitment and disclosure barring/Access to Information**

As part of Reynolds Training Academy’s commitment to safeguarding we will ensure that safer recruitment practices are integrated into our recruitment, selection and induction process and that there are adequate procedures in place within existing policies to identify, monitor and report on issues linked to safeguarding and to uphold its legal obligations by:

Informing the Disclosure and Barring Service (DBS) of any individual (employee, volunteer or other) who poses a threat to children, young people or vulnerable adults which will include:

* Reporting of all disclosed staff criminal records.
* Reporting on disclosed learner criminal convictions.
* Liaising with children’s services departments in child protection and ‘vulnerable’ adults matters, and as appropriate with the local Safeguarding Children’s Board; reporting line on 03000 411111 <https://www.kscb.org.uk/>
* Reporting on the incidence of bullying and harassment.

It will also be proactive in:

* Keeping learners’ contact details current.
* Maintaining confidential records of learners’ medical conditions where appropriate.
* Identifying and addressing issues at home or at College which may affect the safety, welfare or education of individual learners.
* Ascertaining if additional control measures in regard to safety and security of the learners are required.
* Seeking the views of learners on the adequacy of the College’s safeguarding arrangements.

**Review of Policy and Procedures**

Reynolds Training Academy will conduct regular internal risk assessments on all areas of its service delivery and administrative activities. The Policy will be reviewed by the Safeguarding and Prevent Team and Senior Management Team annually or more frequently in response to new legislation or where an incident has occurred that requires adjustment to processes within. In response to changes in legislation, regular updates and bulletins will be disseminated to staff and learners prior to any review date.

All staff should review and refresh their prevent training throughout any given year as and when potential threats and/or raised awareness arise, for example responding to learner and staff alerts, localised threats, global and national news. In line with good practices, all staff must refresh their prevent training every 3 years.

**Reporting Procedures**

If an allegation or suspicion of abuse is discovered, including child-on-child abuse (see child-on-child abuse policy) you should inform the DSL or member of the Safeguarding and Prevent team as soon as possible and within 24 hours. If this is not possible and there is an immediate risk, report it to the appropriate authority, e.g., police, NSPCC, children’s social care or adult social care (social services). The assessor/tutor will then inform Reynolds Training Academy. Reporting an incident is key – see appendix A for reporting form (‘Child Protection and Adults Alert Form’).

**What is Abuse?**

Abuse is a violation of an individual’s human and civil rights by any other person or persons. It can take a number of forms:

1. Physical.
2. Emotional abuse

c) Sexual abuse.

d) Neglect.

Further information/examples of types of abuse can be found in KCSIE 2021 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

The person making the assessment should make a written record of the allegation or suspicion of abuse (using the ‘Child Protection and Adults Alert Form) and discuss the situation with a member of the designated Safeguarding and Prevent Team. The designated Safeguarding Lead for Reynolds Training Academy will make a decision based on evidence and risk assessment regarding the concern/incident within 24 hours of receiving the information.

If a learner/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the learner to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to:

1. The scale of the abuse;

2. The risk of harm to others;

3. The capacity of the learner to understand the issues of abuse and consent;

If there is any doubt about whether or not to report an issue to Social Services then it should be reported.

In emergency situations (e.g. where there is the risk or occurrence or severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted.

Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

The following resources may be helpful in understanding and teaching about safeguarding:

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

<https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

<https://www.uscis.gov/about-us/uscis-visitor-policy>

<https://www.thinkuknow.co.uk/parents/who-are-we/>

<https://www.gov.uk/government/news/new-every-mind-matters-campaign-to-improve-peoples-mental-health>

**Information Sharing**

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.

Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

Where possible, Reynolds Training Academy will share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where safety may be at risk.

**Independent Safeguarding Authority**

‘A person who is barred from working with children or vulnerable adults will be breaking the law if they work or volunteer or try to work or volunteer with those groups. An organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law.’

Reynolds Training Academy therefore ensures that anyone working with children or those that could be deemed a vulnerable adult is DBS checked.

This policy should be used in conjunction with the following policies:

* Health and Safety
* Recruitment of Staff
* Equality & Diversity
* Anti-Bullying & Harassment
* Staff Code of Conduct
* Learner Disciplinary
* E-safety

This Policy is supported by resources for staff and learners which are published along with displayed information within Reynolds Training Academy.

**Designated Safeguarding Lead**

Amanda Tooms – Principal, 01322 275807 – amanda@reynoldsgroup.co.uk

**Deputy Safeguarding Lead**

Marissa Dunlop – Deputy Principal, 01322 275807 – marissa.dulop@reynoldsgroup.co.uk

**Safeguarding and Prevent Team**

* Kelly Bancroft – Deputy DSL for Rainham site, Programme Manager for Beauty Therapy and Fitness Instruction (01322 275807 - kelly@reynoldsgroup.co.uk);
* Sylvia Bruce – Lifestyle Coach and Mentor (01322 275807 -sylvia.bruce@reynoldsgroup.co.uk);
* Carly Dodds – Performing Arts Tutor and Personal Tutor for YR2 & 3 (01322 275807 – carly.dodds@reynoldsgroup.co.uk);
* Rachel Gasson – Deputy DSL for Rainham site, Beauty Therapy Tutor (01322 275807/01634 233194 – rachel@reynoldsgroup.co.uk);
* Jordan Holland - Beauty Therapy Tutor, (01322 275807 – jordan.holland@reynoldsgroup.co.uk);
* Diane Hughes – Programme Manager for Beauty Therapy (North) diane.hughes@reynoldsgroup.co.uk;
* Tiffany Hughes – MIS and compliance manager (01322 275807 – tiffany.hughes@reynoldsgroup.co.uk);
* Adam Leese – Performing Arts Tutor (01322 275807 – adam.leese@reynoldsgroup.co.uk);
* Paige Bowyer – Centre Coordinator, Rainham (01634 233194 – paige.bowyer@reynoldsgroup.co.uk)
* Gemma Walker – Educational Health Care Plan (EHCP) and Functional Skills Manager (01322 275807 – gemma.walker@reynoldsgroup.co.uk)
* Nikki Wright – Fitness Tutor (01322 275807 – nikki@reynoldsgroup.co.uk);
* Leyla Pellegrini – Performing Arts Tutor (01322 275807) leyla.pellegrini@reynoldsgroup.co.uk
* Alanna Kajdi – Performing Arts Tutor (01322 275807) alanna.kajdi@reynoldsgroup.co.uk
* Lisa King – Receptionist, Dartford (01322 375807) lisa.king@reynoldsgroup.co.uk
* Amie Donnelly – Beauty Therapy Tutor – (01322 275807) amie.donnelly@reynoldsgroup.co.uk

**Out of hours/anonymous safeguarding number: 07494262377**



**APPENDIX A**