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| Signed by Head of Centre | *Michelle Masters* |
| Date signed | 17/09/2025 |
| Signed by Chair of Trustees | *Tony Lake* |
| Date signed | 17/09/2025 |

## Policy Contents

# 1    Important Contacts

| Role | Name | Contact details |
|---|---|---|
| **Designated Safeguarding Lead (DSL)** | Michelle Masters | michelle.masters@reading.rblc.org.uk<br>0118 958 3004 / 07596442795 |
| **Deputy DSL** | Sarah Doran | sarah.doran@reading.rblc.org.uk<br>0118 958 3004 |
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| **Channel helpline** | | 020 7340 7264<br>https://www.gov.uk/government/case-studies/the-channel-programme |
| **LADO** | Reading | 0118 937 2684<br>lado@brighterfuturesforchildren.org |
| | Hampshire | lado@hants.gov.uk |
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| | Royal Borough of Windsor and Maidenhead | 020 88917370 or 07774332675<br>lado@achievingforchildren.gov.uk |
| | West Berkshire | lado.lado@westberks.gov.uk |
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| **Children's Social Care** | The Children's Single Point of Access | cspoa@brighterfuturesforchildren.org<br>0118 937 3641<br>https://brighterfuturesforchildren.org/report-concerns-about-a-child/ |
| **Ofsted** | | enquiries@ofsted.gov.uk<br>0300 123 4666 |

## 2     Policy Statement, Provision and Purpose

2.1     RBR fully recognises the responsibility it has under section 157/175 of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children. This responsibility is more fully explained in the statutory guidance for schools and colleges (and in our case "Centre") Keeping Children Safe in Education, updated September 2025. RBR will ensure that all staff are made aware of their duties and responsibilities under part one  of this document.

2.2     This policy sets out how the Senior Leadership Team (SLT) at RBR will discharge their statutory responsibilities relating to safeguarding and promoting the welfare of students who are provided for by the charity. The policy applies to all staff, paid or unpaid, those directly employed, agency workers or contractors working anywhere within the organisation, including trustees. Support staff, housekeeping staff and administrators as well as teachers can be the first point of disclosure for a student.

2.3     This policy will be reviewed by the Safeguarding Trustee and Head as part of the annual Safeguarding Audit which takes place each summer term. Updates will be made in light of this review, as well as in light of any updates to Government guidance such as KCSIE (Keeping Children Safe in Education) 2025.

2.4     Updates may also be required in addition to the annual review, as detailed in clause 2.3, in all instances amendments will be communicated to all staff to read. Once read staff are required to confirm they have read and understood the additions. Staff are encouraged to seek further guidance from the DSL team, where they have questions or need further clarification.

2.5     This policy sets out RBR's commitment to meeting all legislative requirements with regard to 'keeping children safe' and complying with all relevant guidance and ensuring that all RBR students are safe at all times, both physically and emotionally.

2.6     RBR will provide a working culture and working environment which is safe, positive and open, where staff (and students) are able to discuss any safeguarding matters and low-level concerns in and outside of work, including those relating to online matters.

2.7     RBR staff will always consider the 'best interests of the student' in all areas of practice, and keep in mind that "it could happen here.".

2.8     Through their day-to-day contact with students and direct work with families all RBR staff have a responsibility to:

   a.   identify concerns early to prevent them from escalating;

   b.   provide a safe environment in which students can learn;

   c.   identify students who may benefit from early help assessment;

   d.   know what to do if a student tells them they are being abused, neglected or exploited; and

   e.   follow the referral process if they have a concern.

2.9     It is RBR's statutory responsibility to safeguard and promote the welfare of students. RBR endeavours to ensure that the recruitment, training, record keeping, monitoring and practice of all staff is of the very highest standard; that it is in accordance with the relevant UK GDPR and data protection legislation, including the Information Commissioners Office (ICO) employment practice guidance (2025); and should there be concerns regarding a student's welfare or safety as a result of events in their home, the Centre, through our outreach offering; or the wider community, staff feel confident as to how to respond to those concerns.

2.10    Further RBR seeks to ensure that no student is exposed to materials or persons that are likely to lead to that young person becoming radicalised. RBR is clear that radical, or extreme views may come from any source that encourages extreme views, acts of violence or destruction.

2.11    RBR aims to ensure that:

   a.   Appropriate action is taken in a timely manner to safeguard and promote student welfare;

   b.   All staff are aware of their statutory responsibilities with respect to safeguarding and act accordingly, in line with our policies and procedures; and

   c.   Staff are properly trained in recognising and reporting safeguarding issues.

## 3        Scope

3.1     This policy applies to all employees, agency workers, contractors, freelance, volunteers ("staff") trustees and any other individual who is associated with RBR either within the Centre or through activities outside of the Centre.

3.2     Whilst there are contractual or agreement Safeguarding and Child Protection obligations that staff and trustees have, this policy in itself does not form a part of the contract or agreement and may be updated at any time where it is deemed necessary. For example, following legislative amendments, an inspection or where a policy review has taken place. In all instances. policy amendments will be shared and communicated to all staff.

3.3     Safeguarding and child protection is the legal responsibility of every individual who works in whatever capacity for RBR. A failure to adhere to RBR's policy and procedures may result in action being taken against the individual concerned, where a failure is deemed serious enough further action may be taken internally and externally of the Centre.

## 4        Policy Elements

4.1     There are four main elements to the policy:

   a.   **Prevention** through the teaching and pastoral support offered to students and the creation and maintenance of a whole Centre protective ethos. (Section 9 of the policy)

   b.   **Procedures** for identifying and reporting cases, or suspected cases of abuse and low-level concerns whether they are adult-on-student or student-on-student. (Section 10)

   c.   **Supporting Students**, particularly those who are vulnerable to harm or maltreatment, are under the SEND provision, looked after, or who may have already experienced maltreatment, harm or been abused or witnessed violence towards others. RBR is committed to and will actively work using the multi-agency approach in supporting the students who use the Centre, our virtual educational offering and outreach provision. (Section 8)

   d.   **Preventing Unsuitable Persons from Working with Students**, by ensuring processes (e.g., safer recruitment) are in place, communicated clearly, and are followed to make certain that all staff engaged to work for RBR are 'suitable' for the task i.e., they pose no threat to the welfare, health or safety of young people referred to the organisation. (Section 11)

4.2     This policy is available to parents on request and is posted on the charity's website. It is only

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available in English (language), but should a parent or carer require linguistic support to access the policy, the Designated Safeguarding Lead (DSL) will liaise with the local authority to ensure appropriate support is made available.

## 5 Definitions

5.1 In line with Keeping Children Safe in Education (KCSIE) 2025 the definition for Safeguarding and promoting the welfare of children, reflecting Working Together to Safeguard Children (DfE, 2023), means:

    a. Providing help and support to meet the needs of children as soon as problems emerge;

    b. Protecting children from maltreatment, whether that is within or outside the home, including online;

    c. Preventing the impairment of children's mental and physical health or development

    d. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

    e. Taking action to enable all children to have the best outcomes.

5.2 **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

5.3 **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. It includes children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects. Part 1 of the KCSIE legislation explains the different types of abuse.

5.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Part 1 of the KCSIE legislation defines neglect in more detail.

5.5 **Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery)** is where children share nude or semi-nude images, videos, or live streams.

5.6 **Children (students)** includes everyone under the age of 18.

5.7 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

    a. The local authority (LA);

    b. A clinical commissioning group for an area within the LA; and

    c. The chief officer of police for a police area in the LA area.

5.8 **Victim** is a widely understood and recognised term, but RBR understands that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, staff will be prepared to use any term that the student involved feels most comfortable with.

5.9 **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, staff will think carefully about what terminology they use (especially in front of students) as, in some cases, abusive behaviour can be harmful to the perpetrator too. The DSL will decide

what's appropriate and which terms to use on a case-by-case basis.

5.10    **Local Authority Designated Officer (LADO)** is the individual appointed by the Local Authority, who work closely within children's services and should be alerted where it is alleged that a person who works with children has:

    a.    behaved in a way that has harmed a child, or may have harmed a child;

    b.    possibly committed a criminal offence against or related to a child;

    c.    behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or

    d.    behaved or may have behaved in a way that indicates they may not be suitable to work with children (Working Together to Safeguard Children 2023)

5.11    **Designated Safeguarding Lead (DSL)** is an appropriate, member of staff at a senior level who is explicitly appointed to take the "lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)" (KCSIE 2025). In their role they offer support and guidance to staff in matters relating to child safeguarding, protection and welfare.  They will attend strategy meetings and be the key individual liaising between external agencies and safeguarding partners.

5.12    **Child in Need (CIN)** is defined under the Children Act 1989 as:

    a.    "the child is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority under Part III of the Children Act 1989;

    b.    the child's health or development is likely to be significantly impaired, or further impaired, without the provision of such services; or

    c.    the child is disabled."

5.13    **Child at Risk (CIR)** is defined under the Children Act 1989 as a child who:

    a.    Is experiencing or is at risk of abuse, neglect, exploitation or other kinds of harm.

    b.    Has a need for care and support (whether or not the authority is meeting any of those needs).

5.14    The use of the term 'at risk' means that actual abuse, neglect or exploitation does not need to occur, rather that early interventions to protect a child at risk should be considered to prevent actual harm, abuse, neglect and exploitation.

5.15    Significant harm is defined by this Act as:

    a.    physical, mental or sexual ill treatment

    b.    physical

    c.    or mental impairment of health

    d.    physical, behavioural, emotional, intellectual or social impairment of development.

5.16    **CPOMs** means Child Protection Online Management System, and is software used in education settings to record and store data about children.  All staff have their own logins and should use the system to record concerns, actions and updates.

# 6 Equality Statement

6.1 Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing it. RBR is committed to anti- discriminatory practice and recognise students' diverse circumstances. RBR staff ensure that all students have the same protection, regardless of any barriers they may face.

6.2 RBR gives special consideration to students who:

a. Have special educational needs (SEND) or disabilities or health conditions;

b. Are young carers;

c. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;

d. Have English as an additional language;

e. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;

f. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;

g. Are asylum seekers;

h. Are at risk due to either their own or family members' mental health needs;

i. Are looked after or previously looked after;

j. Are missing from education; and

k. Whose parent/carer has expressed an intention to remove them from Centre to be home educated.


# 7 Roles and Responsibilities

7.1 Safeguarding and student protection is everyone's responsibility. This policy applies to all staff, volunteers, and trustees (staff) in the Centre and anyone else associated with it. It is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended Centre and off-site activities.

7.2 The Centre plays a crucial role in preventative education. This is in the context of a whole-Centre approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This is underpinned by our:

a. Staff Code of Conduct Policy;

b. Student-on-Student Policy;

c. Behaviour Policy;

d. Pastoral support system; and

e. Planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

   i. Healthy and respectful relationships;
   ii. Boundaries and consent;
   iii. Stereotyping, prejudice, and equality;
   iv. Body confidence and self-esteem;
   v. How to recognise an abusive relationship (including coercive and controlling behaviour);
   vi. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse,

grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support; and

vii. What constitutes sexual harassment and sexual violence and why they are always unacceptable.

**All staff**

7.3 Staff who work, in whatever capacity and either directly or indirectly at RBR with students are expected to read part 1 and annex B of Keeping Children Safe in Education (KCSIE) 2025.

7.4 All staff will:

a. Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually;

b. Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance;

c. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what staff ask students to do online (e.g., sites they need to visit or who they'll be interacting with online);

d. Recognise that some students are more vulnerable and therefore at greater risk than others when both online and offline;

e. Actively support students (children) who are "absent from education" in order to prevent the risk of them becoming "missing in education"; and

f. Provide a safe space for students who are LGBT+ to speak out and share their concerns.

7.5 All staff will be aware of:

a. RBR's systems which support safeguarding, including our policy and procedures in this document, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to students who go missing from education;

b. The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;

c. The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;

d. What to do if they identify a safeguarding issue or a student tells them they are being abused, neglected or exploited, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;

e. The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as student-on-student abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);

f. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;

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g. The fact that students can be at risk of harm inside and outside of their home, at the Centre, online and offline;

h. The fact that students who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT+) can be targeted by other students;

i. What to look for to identify students who need help or protection, and are confident in using the internal referral process; and

j. Have knowledge of how the external referral procedure and who to contact.

**The Head of Centre**

7.6 The Head of Centre (as well as being DSL), Michelle Masters is responsible for the implementation of this policy, including:

a. Ensuring that staff (including temporary staff), contractors and volunteers:
   i. As part of their induction all staff are informed of our systems that supports safeguarding and student protection, including online safety expectations, applicable roles and responsibilities in relation to filtering and monitoring in accordance with this policy and KCSIE 2025; and
   ii. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation.

b. Communicating this policy to parents/carers when their child joins and for their time at the Centre as a student via the RBR's website, emails and conversations;

c. Ensuring that the DSL team has appropriate time, funding, training, and resources, and that there is always adequate cover if the Lead DSL is absent;

d. Ensuring that all staff undertake appropriate safeguarding and child protection (including online safety in accordance with KCSIE 2025) training, and updating the content of the training regularly;

e. Provide all staff with updates via emails, e-bulletins and staff meetings to help them maintain effective relevant and updated safeguarding and student protection skills, including online safety.

f. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate; and

g. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL deputies on this.

7.7 Virtual school heads with a social worker have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of students. As such, the Head of Centre will work closely with the outreach team, teachers who deliver lessons through the RB Air offering and the SENCO, to enable them to identify and engage with key professionals, e.g., social workers, mental health leads and others.

**The Designated Safeguarding Lead (DSL)**

7.8 The DSL is a member of the senior leadership team. RBR's DSL is Michelle Masters, Head of Centre. The DSL takes lead responsibility for student protection and wider safeguarding in the Centre and in the outreach programme.

7.9 During term time, the DSL will be available for staff to discuss any safeguarding concerns. Term

time hours are Monday – Friday 8.30am to 430pm. The Centre's phone number is: 0118 958 3004. Alternatively, the DSL's email is: michelle.masters@reading.rblc.org.uk

7.10    Outside of term time, the DSL, can be contacted at michelle.masters@reading.rblc.org.uk or 07596442795.

7.11    When the DSL is absent, the deputies, Sarah Doran and Caroline Oke will act as cover. Their contact times, term time are also Monday – Friday 8.30am to 430pm and their contact details are in Section 1 of this policy.

7.12    If the DSL and deputies are not available, Rebecca Pittman (Administrator) will act as cover (for example, during out-of-hours/out-of-term activities).

7.13    The DSL will be given the time, funding, training, resources and support to:

a.    Take the lead responsibility in understanding the online filtering and monitoring systems in place in RBR including those used by staff delivering the outreach programme.

b.    Provide advice and support to other staff on student welfare and protection matters;

c.    Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;

d.    Contribute to the assessment of students;

e.    Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly; and

f.    Have a good understanding of harmful sexual behaviour.

7.14    The DSL will also:

a.    Keep the Chair of Trustees and Safeguarding and Child Protection Trustees informed of any issues;

b.    Liaise with local authority case managers and designated officers for student protection concerns as appropriate;

c.    Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the Centre's policies;

d.    Be confident that they know what local specialist support is available to support all students involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support; and

e.    Be aware that students must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

7.15    The full responsibilities of the DSL and deputies are set out in their job descriptions.

**The Trust Board**

7.16    RBR Trustees fully recognise their responsibilities with regard to student (child) protection and safeguarding and promoting the welfare of students. All trustees work jointly with the DSL through the nominated trustee to ensure that the policies, procedures, communication and training in the centre are effective and comply with the law and government guidance at all times, including obligations under the Human Rights Act 1998 and the Equality Act 2010, (including the Public Sector Equality Duty) and local multi-agency safeguarding arrangements.

7.17    As such the Trustee board will:

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a. Evaluate and approve this policy at each review, ensuring it is on RBR's website, complies with the law, is relevant to RBR, and hold the Head of Centre to account for its communication, training and implementation to enable appropriate and effective action ensuring a whole-Centre approach to safeguarding and student protection;

b. Review the DfE's filtering and monitoring standards, discussing with IT staff and the provider how the Centre can meet the required standards.

c. Complete the required training and have an awareness of any local context safeguarding and/or student protection issues released by the Centre's safeguarding partners;

d. Appoint a senior board level (or equivalent) lead or Trustee to monitor the effectiveness of this policy (this is always a different person from the DSL) in conjunction with the full trust board and ensure that the nominated trustee has the necessary safeguarding training;

e. Make sure:
   i. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
   ii. The DSL fully understands and takes responsibility for the filtering and monitoring systems and processes and that the form a pivotal aspect of their role;
   iii. Online safety is a running and interrelated theme within the whole-Centre approach to safeguarding and related policies;
   iv. The leadership team and staff are aware of and understand the IT filters and monitoring systems in place, expectations, their roles and responsibilities, managing them effectively and know how to escalate concerns;
   v. The Centre has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors); and
   vi. That this policy reflects those students with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse, neglect or exploitation being recognised.

f. Where another body is providing services or activities (regardless of whether or not the students who attend these services/activities are students on the Centre roll):
   i. Seek assurance that the other body has appropriate safeguarding and student protection policies/procedures in place, and inspect them if needed;
   ii. Make sure there are arrangements for the body to liaise with the Centre about safeguarding arrangements, where appropriate; and
   iii. Make sure that safeguarding requirements are a condition of using the Centre premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

7.18    All trustees must recognise that whilst all students must be protected, that some are more vulnerable and therefore at a potential risk of harm than others, this includes (but not limited to) CIN, and those with protection plans, those absent from education or needing mental health support, those with SEND requirements, and those who are lesbian, gay, bi or trans (LGBTQ+).

7.19    The nominated trustee for safeguarding and student protection will:
   a. Ensure an annual report is made to the full RBR Board (and copied to the appropriate

Education Child Protection Service where that is required) - any identified weaknesses / shortcomings identified through scrutiny of this report will be rectified immediately or as soon as reasonably possible dependent on the action required;

b. Check that students' exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems that are regularly reviewed to ensure their effectiveness;

c. Ensure a student's wishes and feelings are taken into account where there are safeguarding concerns.

7.20 The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Head of Centre.

7.21 All Trustees will read Keeping Children Safe in Education in its entirety and provide confirmation of it.

# 8 Supporting Students

8.1 RBR recognises that any student may be subject to abuse, neglect and/or exploitation. RBR staff should be aware that RBR's cohort of students often have complex needs and may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

8.2 In addition, all staff (including the Trustee Board) must be aware that the students are at additional risk of harm due to past experiences and/or needs. Where RBR works collaboratively with a school, it will provide written confirmation to the school when asked that safeguarding checks are carried out on all staff working within the RBR provision and will ensure that it updates the commissioning school of any arrangements (such as staff changes) that may put the student at risk

8.3 There may be times when students are required to give evidence in criminal courts, either when crimes are committed against them or for crimes they have witnessed. RBR should refer to the appropriate guide when supporting students: https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

8.4 Staff must support all students by:

a. establishing trusting relationships with students which facilitate communication;

b. providing curricular opportunities to encourage positive self-esteem and self-efficacy;

c. creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community;

d. providing students with preventative education, which creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment;

e. applying RBR's Behaviour for Learning policy effectively - staff will agree on a consistent approach, which focuses on the behaviour of the student but does not damage their sense of self-worth;

f. ensuring that all students know that some behaviours are unacceptable, hence not tolerated, but that they will always be treated respectfully by staff regardless of their behaviour;

g. liaising with other agencies that support young people such as Social Care, Child and Adolescent Mental Health Services (CAMHS), Sexual Behaviour Services or early help

teams; and

h. developing productive and supportive relationships with parents/carers.

8.5 RBR recognises that any student may benefit from early help assessment, but staff are encouraged to consider the wider environmental factors present in a student's life which could pose a threat to their welfare or safety (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help assessment for the following 'categories' of young people. See list of categories - 8.19 to 8.64.

8.6 Where there is a safeguarding concern, The DSL will take the students wishes and feelings into account when determining what action to take and what services to provide. Staff recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, RBR will:

a. Put systems in place for students to confidently report abuse;

b. Ensure our reporting systems are well promoted, easily understood and easily accessible for students; and

c. Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

8.7 If a student discloses a safeguarding issue to you, you should:

a. Listen to and believe them. Allow them to talk freely and do not ask leading questions;

b. Stay calm and do not show that you are shocked or upset;

c. Tell the student they have done the right thing in telling you. Do not tell them they should have told you sooner;

d. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;

e. Using CPOMS, write up your conversation as soon as possible in the student's own words. Stick to the facts, and do not put your own judgement on it; and

f. Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

8.8 Bear in mind that some students may:

a. Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;

b. Not recognise their experiences as harmful; and/or

c. Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

8.9 None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a student.

8.10 Please see the flowchart in Appendix 0 of this document to see the procedures when there is a concern for a student.

**Early Help Assessment**

8.11 If an early help assessment is appropriate, the DSL will generally lead on liaising with other

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agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early-help assessment, in some cases acting as the lead practitioner.

8.12 Early help is support for students, which can help improve a family's resilience and outcomes or reduces the chance of a problem getting worse. KCSIE 2025 states that "providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support."

8.13 In doing so, the DSL will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

8.14 The DSL will keep the case under constant review, and the Centre will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

**Referral**

8.15 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral themselves or support staff to do so.

8.16 If you make a referral directly (see clauses 8.47 to 8.51 of this section), you must tell the DSL as soon as possible.

8.17 The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

8.18 If the student's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the student's situation improves.

***Students with Disabilities, Additional Needs or Special Educational Needs***

8.19 RBR recognises that, statistically, students with additional needs, special educational needs, emotional and behavioural difficulties and disabilities or who are lesbian, gay, or trans (LGBT+) are most vulnerable to abuse. Staff will be encouraged to be particularly aware of the likelihood of abuse in the lives of these students.

8.20 As part of the PSHE and RSHE curriculum staff will teach students personal safety skills commensurate with their age, ability and needs. Students will be taught personal safety skills such as 'telling' and who to tell, good and bad touches and how to manage risk. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

***Young Carers***

8.21 RBR recognises that students who are living in a home environment which requires them to act as a young carer for a family member or a friend who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

8.22 Staff will seek to identify young carers and offer additional support internally. They will liaise with external agencies as appropriate and refer to Social Care if such referral appears appropriate / supportive.

***Students who are lesbian, gay, bisexual, or gender questioning***

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8.23 The 2025 KCSIE draft states:

    a. "A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

    b. However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

    c. It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

    d. As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

    e. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff."

### Students at Risk of Criminal Exploitation

8.24 Criminal exploitation of children is a form of abuse. It may take many forms but invariably involves adults or other children encouraging / forcing / bribing children to engage in criminal activity on their behalf e.g., drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if the activity appears to be consensual.

8.25 Staff will be trained to be aware of child criminal exploitation to include developments in 'County Lines' activity and will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

8.26 The DSL will complete the Local Safeguarding Children Partnership (LSCP) Child Exploitation Checklist and refer to the Multi-Agency Safeguarding Hub (MASH) if there is a concern that a young person may be at risk of criminal exploitation.

8.27 RBR recognises that young people who go missing can be at increased risk of child criminal exploitation and/or trafficking and has procedures in place to ensure appropriate response to students who go missing, particularly on repeat occasions (see below).

### Students with Unexplainable and/or Persistent Absences from Education

8.28 A student has 'unexplainable and/or persistent absences from education' should act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation, child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM (female genital mutilation) or forced marriage.

8.29 RBR monitors attendance of individual students closely, as outlined in its Attendance Policy, monitors mental health and analyses patterns of absence to aid early identification of

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concerning patterns of absence.

8.30    RBR aims to hold more than one emergency contact for each student to provide additional options to make contact with a responsible adult when a student has unexplainable and/or persistent absences from education is identified as a welfare and/or safeguarding concern.

8.31    When a student is missing from education, RBR follows Children Missing Education guidance (Statutory guidance for local authorities, August 2024). The Centre will inform the Education Welfare Service and Social Care if a missing student is subject to a Child Protection Plan or there have been ongoing concerns.

### Fabricated / Induced Illness (FII)

8.32    FII is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the student and understands that it is a form of child abuse. RBR will:

    a.   ensure that the designated safeguarding lead is trained to recognise and respond appropriately should suspicions arise, no matter how far-fetched they appear;

    b.   promote awareness of FII through training and access to resources;

    c.   ensure that the signs and indicators are known and recognised by staff and that unexplained absences are recorded and explored further;

    d.   ensure that, where appropriate, students are encouraged to seek help and support about concerns they may have;

    e.   ensure that all staff are aware that any suspicions should be reported to the designated safeguarding lead;

    f.   understand that sharing information with parents or carers may not be appropriate and ensure that decisions of this nature are made by Children's Social Care or the police.

### Students Misusing Drugs or Alcohol

8.33    The discovery that a student is misusing legal or illegal substances or reports of their substance misuse are not necessarily sufficient to initiate child protection proceedings, but the centre will consider such action when there is evidence or reasonable cause to:

    a.   believe the student's substance misuse may cause them to be vulnerable to other abuse such as sexual abuse;

    b.   believe the student's substance related behaviour is a result of abuse or pressure or incentives from others, particularly adults;

8.34    or where:

    a.   the misuse is suspected of being linked to parent/carer substance misuse;

    b.   the misuse indicates an urgent health or safeguarding concern;

    c.   the student is perceived to be at risk of harm through any substance associated with criminality.

### Students at Risk of Child Sexual Exploitation

8.35    Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical

contact; it can also occur through the use of technology.

8.36    Sexual exploitation can take many different forms from a seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of sexual exploitation arise.

8.37    The DSL will complete the Local Safeguarding Children Partnership (LSCP) Child Exploitation Checklist and refer to the Multi-Agency Safeguarding Hub (MASH) if there is a concern that a student may be at risk of sexual exploitation.

8.38    Young people who go missing can be at increased risk of sexual exploitation, hence the Centre has procedures in place (described above) to ensure appropriate response to students who go missing, particularly on repeat occasions.

8.39    Students living with substance misusing parents/carers

8.40    Misuse of drugs and/or alcohol is strongly associated with significant harm to children, especially when combined with other features such as domestic violence.

8.41    Should staff become aware that any of the following factors are present:

a.  use of the family resources to finance the parent's / parents' dependency, characterised by inadequate food, heat and clothing for the student;

b.  exposure of the student to unsuitable caregivers or visitors e.g., customers or dealers;

c.  the effects of alcohol on parents/carers leading to an inappropriate display of sexual and/or aggressive behaviour;

d.  drug and / or alcohol use by parents/carers leading to emotional unavailability, irrational behaviour and reduced parental vigilance;

e.  disturbed moods on the part of parents/carers as a result of withdrawal symptoms or dependency;

f.  unsafe storage of drugs and/or alcohol or injecting equipment in the home;

g.  drugs and/or alcohol having an adverse impact on the growth and development of an unborn child...

then referral will be made to the appropriate LSCP.

***Students Living with Domestic Abuse***

8.42    Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse.

8.43    Between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial, and emotional.

8.44    Where there is domestic abuse in a family, the children will always be affected, as they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse); the longer the violence continues, the greater the risk of significant and enduring harm, which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

8.45    Staff will be trained to be vigilant to signs of domestic abuse and will always refer to

appropriate agencies should they consider that there is evidence of such abuse taking place. The DSL will either engage in specific training regarding domestic abuse or ensure another member of staff is appropriately trained.

8.46   The centre will vigilantly monitor the welfare of students living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

### Students at risk of 'Honour- Based' Violence (HBV) including Female Genital Mutilation (FGM) and Forced Marriage

8.47   The term 'honour-based' violence encompasses incidents which have been committed to protect or 'defend the honour' of a family and/or community, including breast ironing, female genital mutilation and forced marriage. DSLs will ensure that all staff are made aware of the possible signs and indicators that may alert them to the possibility of HBV through training. Staff are required to treat all forms of HBV as abuse and follow appropriate procedures.

8.48   FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Where there is any indication that a student is at risk of FGM or where a student has informed staff, or where staff suspect FGM to have been carried out, they will take action in accordance with the child protection procedures outlined in this policy.

8.49   In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in children (i.e., those under the age of 18) to the police. Staff must therefore immediately report this to the police, personally. After the police have been contacted, unless otherwise told not to, the DSL must be notified. They will make appropriate and timely referrals to social care. In such cases parents will not be informed before advice is sought and the case will still refer to social care even if it is against the student's wishes.

8.50   Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

8.51   The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

### Students 'looked after' by the local authority.

8.52   RBR recognises that looked after children may be more vulnerable to abusive behaviour from others and may have additional needs resulting from their life experiences. Centres will liaise with local authority for looked after children and work with local authority staff to ensure students are supported and 'kept safe' wherever possible. The Centres will work with carers as they would with all parents to ensure 'wrap around' support.

### Students who have returned home to their family from care.

8.53   RBR recognises that a previously looked after child potentially remains vulnerable. Staff will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern.

### Students showing signs of Abuse, Neglect and/or Exploitation.

8.54   Abuse, neglect or exploitation will almost certainly have an adverse impact on those students

who experience it. This may last into adulthood unless there is appropriate intervention and support. Centre may be the only stable, secure and predictable element in the lives of students at risk. Students who have experienced abuse, neglect or exploitation may subsequently behave in ways that are challenging and defiant or passive and withdrawn. RBR recognises that students may develop abusive behaviours and that these students may need to be referred on for appropriate support and intervention.

8.55    RBR will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

### Students at Risk of Radicalisation

8.56    RBR recognises that students may be vulnerable to extremist ideology, radicalisation, and into terrorism. Protecting students from this risk forms part of RBR's safeguarding response.

8.57    RBR management will ensure that all DSLs and safeguarding trustees have undertaken Prevent awareness training and that all staff receive training about their Prevent duty.

8.58    KCSIE 2025 identifies Extremism, Radicalisation and Terrorism as:

  a.  Extremism as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

  b.  Radicalisation as the process of a person legitimising support for, or use of, terrorist violence.

  c.  Terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

8.59    Through appropriate training staff will ensure that staff are alert to changes a student's behaviour which could indicate they need help or protection. Concerns that a student is at risk of radicalisation must be referred to the DSL in the usual way. If appropriate, the DSL will make a Channel referral.

8.60    Further information is available in The Prevent Duty, Departmental Advice for Centres and Childcare Providers, June 2015, and Revised Prevent Duty Guidance: for England and Wales, July 2015.

### Privately Fostered Students

8.61    Private fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation for 28 days or more by a person who is not a parent, person with parental responsibility for them or a relative.

8.62    The centre (through the DSL) will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements.

### Students who have Family Members in Prison

8.63    Students with family members in prison are usually at significant risk of poverty, stigma, isolation, poor mental health and poor attendance. RBR is committed to supporting students

who have a parent or close relative in prison and will work with the family to find the best ways of supporting the student.

8.64    The centre will work with the family and the student to minimise the risk of the student not achieving their full potential, RBR will treat information shared by them in confidence and it will only be shared on a 'need to know' basis.

# 9    Prevention

9.1    RBR recognises that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect students.

9.2    RBR will therefore:

   a.   establish and maintain an environment where students feel safe in both the real and the virtual world - all students are encouraged to talk openly and are listened to;

   b.   ensure students know that there are adults in the organisation that they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate;

   c.   include in the curriculum activities and opportunities which equip students with the skills they need to stay safe from abuse both in the real and the virtual world;

   d.   ensure all students know who to turn to for help should they need it;

   e.   include in the curriculum material which will help students develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;

   f.   ensure that specific education and guidance regarding safeguarding, including online safety is included within the Centre's Personal, Social and Health Education (PHSE) and Relationships, Sex and Health Education (RSHE) are included in our curriculum.

   g.   advise both students and parents of the risks when accessing online sites when away from Centre, for example (but not limited to) social media and inappropriate, abusive or hateful content.

9.3    The teaching of 'online safety' will run throughout the work of all staff through the curriculum offered and advice to and ongoing conversations with students regarding the best ways to make use of all the benefits of technology without placing themselves at risk of harm.

9.4    RBR recognises our crucial role in preventative education. "Prevent" education is most effective in the context of a whole-Centre approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. RBR sets clear values and standards will be upheld and demonstrated throughout all aspects of Centre life.

9.5    RSHE equips RBR students with the fundamental knowledge and skills they require to navigate relationships, understand their sexuality, and manage their health, which directly contributes to their overall safety and well-being. It aligns with the core principles of KCSIE 2025, to the content of the guidance, which is a crucial part of that framework, particularly in areas like preventing sexual abuse and promoting healthy relationships. Further information about the guidance at: https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

9.6    RBR's values are underpinned by our behaviour policy and pastoral support system whether it be via general conversations or our mentoring sessions, as well as by a planned programme

of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of students with SEND and other vulnerabilities).

9.7 Our programme will include at age/developmental-appropriate stages issues such as:

    a. Healthy and respectful relationships;

    b. Boundaries and consent;

    c. Stereotyping, prejudice and equality;

    d. Body confidence and self-esteem;

    e. How to recognise an abusive relationship, including coercive and controlling behaviour;

    f. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support; and

    g. What constitutes sexual harassment and sexual violence and why these are always unacceptable.

### Induction and ongoing training

9.8 All staff will be taken through a comprehensive induction process in which safeguarding and child protection is a key element. No member of staff will engage in regulated activity until they have completed this process.

9.9 As part of that process staff will be required to read, and sign to say that they have read and will implement the requirements of:

    a. Chapter one of Keeping Children Safe in Education, September 2025, together with 'Annex A' of that document;

    b. Chapter one of Working Together to Safeguard Children, 2023;

    c. What to do if you're worried a student being abused: Advice for Practitioners, March 2015;

    d. RBR's Safeguarding and Child Protection, Whistleblowing and Behaviour for Learning Policies and the Staff Code of Conduct. The training provided should equip staff and volunteers with the knowledge to understand RBR policies and procedures and provide sufficient challenge to ensure that they are effective and support a whole- Centre approach to safeguarding. However, staff should seek clarity from the Head of Centre or in their absence a member of the DSL team where they are unsure of any part of our policies and/or procedures.

9.10 All staff will complete training on Level One Child Protection, Prevent and any other specific training which is deemed relevant. RBR will update that training as required and ensure that all staff are informed of the changes to required practice (local or national) through electronic updates.

9.11 Through appropriate training RBR will ensure that all staff are aware of the need to recognise when students are in need or at risk, are able to distinguish between the two categories, and understand what course of action should be taken when a student is deemed to come into either category.

9.12 Staff have a responsibility in keeping their safeguarding training up to date and failing to do so may be seen as misconduct.

### *Child in Need (CIN)*

9.13    "If staff members have any concerns about a student (as opposed to a student being in immediate danger), they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board."

### *Child (Student) at Risk*

9.14    If a student is deemed to be at risk of immediate harm, then the DSL (or deputies in their absence) must be notified immediately, in order that they can make an immediate referral to social care or to the police: should the DSL or deputies not be immediately available, the person aware of the situation must make the referral.

### *Keeping Children Safe in Education, September 2025, definitions:*

9.15    A student at risk is one who is in immediate danger of harm.

9.16    Keeping Children Safe in Education (September 2025) guidance:

"All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.".

9.17    There is additional information about students who may especially benefit from early help assessments:

"Any student may benefit from early help assessment, but all staff should be particularly alert to the potential need for early help assessment for a student who:

a.    is disabled or has certain health conditions and has specific additional needs;
b.    has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
c.    has a mental health need;
d.    is a young carer;
e.    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;
f.    is frequently missing/goes missing from education, home or care;
g.    has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
h.    is at risk of modern slavery, trafficking, sexual or criminal exploitation;
i.    is at risk of being radicalised or exploited;
j.    has a parent or carer in custody, or is affected by parental offending;
k.    is in a family circumstance presenting challenges for the student, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
l.    is misusing drugs or alcohol themselves;
m.    has returned home to their family from care;
n.    is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
o.    is a privately fostered child; and

p.    is persistently absent from education, including persistent absences for part of the day.

9.18    Options include:

a.    managing any support for the student internally via the Centre's own pastoral support processes;

b.    an early help assessment;

c.    a referral for statutory services, for example as the student is in need or suffering or likely to suffer harm."

### Prevention of Child-on-Child (Student-on-Student) Abuse

9.19    RBR recognises that student-on-student abuse can manifest itself in many ways. This can include, but is not limited to bullying, cyberbullying, sexual violence, sexual harassment, being coerced to send sexual images (sexting), teenage relationship abuse, upskirting (now a criminal offence… see below), and physical abuse.

9.20    All forms of student-on-student abuse are unacceptable and will be taken seriously. RBR will therefore:

a.    create a protective ethos in which student-on-student abuse, including sexual violence and sexual harassment will not be tolerated (NB not being tolerated does not imply that perpetrators will be punished or excluded, rather the nil tolerance will be exemplified as described within RBR's 'Behaviour for Learning' policy); and where should it occur, victims are confident to report it;

b.    provide training for staff about recognising and responding to student-on-student abuse, including raising awareness of the gendered nature of student-on-student abuse, with girls statistically more likely to be victims and boys perpetrators;

c.    ensure that staff do not dismiss instances of student-on-student abuse, including sexual violence and sexual harassment as an inevitable part of growing up. That even if there are no reports of student-on- student abuse in Centre, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

d.    include within the curriculum, information and materials that support students in keeping themselves safe from abuse, including abuse from other students and their peers and online;

e.    provide high quality relationship, sex and health education (RHSE), including teaching about consent;

f.    ensure that staff members follow the procedures outlined in this policy when they become aware of student-on- student abuse.

9.21    Where instances of student-on-student abuse occur, staff will ensure that the student(s) concerned are seen as victim(s) and those seen as perpetrators receive support. Addressing inappropriate behaviour is  vital intervention in to help deal with problematic behaviour or preventing a perpetrator from re-offending. Avice on the gov.uk website, for "Behaviour in schools" provides guidance on how teachers can sanction students where conduct falls below the expected standard. RBR's Anti-Bullying and Behaviour for Learning policies, staff will seek to reach mutually beneficial outcomes through conflict resolution procedures enabling all parties to modify their behaviour and to contribute positively to the RBR community.

### Upskirting

9.22    Upskirting is a term used to describe the act of taking a sexually intrusive photograph up someone's skirt without their permission. The legislation (which came into effect April 2019)

creates two new offences under the Sexual Offences Act 2003.The new offences apply when:

    a.   without consent, an individual operates equipment or records an image beneath a person's clothing;

    b.   an offender has a motive of either obtaining sexual gratification or causing humiliation, distress or alarm to the victim.

9.23      Perpetrators may be imprisoned for two years.

9.24      If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos you must report it to the DSL immediately. You must not:

    a.   View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

    b.   Delete the imagery or ask the student to delete it;

    c.   Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);

    d.   Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers;

    e.   Say or do anything to blame or shame any students involved; and

    f.   You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

### *Online Safety and the Use of Mobile Technology (E-Safety)*

9.25      RBR recognises the importance of safeguarding students from potentially harmful and inappropriate online material and understands that technology is a significant component in many safeguarding, wellbeing and health issues. To address this, RBR aims to:

    a.   Have robust processes and systems in place to ensure the online safety of students, staff, volunteers and trustees blocking harmful content without having a negative impact on teaching and learning. See our E-Safety Policy

    b.   Protect and educate the whole-Centre community in safe and responsible use of technology, including mobile and smart technology (which RBR refers to as 'mobile phones');

    c.   Set clear guidelines for the use of mobile phones for the whole-Centre community; and

    d.   Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

9.26      RBR's approach to online safety is based on addressing 4 key categories of risk:

    a.   Content – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation, disinformation (including fake news) conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism;

    b.   Contact – being subjected to harmful online interaction with other users, such as student-to-student pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

    c.   Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-

consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

d. Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

9.27 To meet RBR's aim and address the risks above RBR will:

a. Educate students about online safety as part of our curriculum. For example:

    i. The safe use of social media, the internet and technology;

    ii. Keeping personal information private;

    iii. How to recognise unacceptable behaviour online; and

    iv. How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.

b. Train staff, as part of their induction, on safe internet use and online safeguarding issues including expectations, their role and responsibilities, cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year;

c. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. RBR will also share clear procedures with them, so they know how to raise concerns about online safety;

d. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example:

    i. Staff are allowed to bring their personal phones to RBR for their own use, but will limit such use to non-contact time when students are not present;

    ii. Staff will not take pictures or recordings of students on their personal phones or cameras.

e. Make all students, parents/carers, staff, volunteers and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the Centre's ICT systems and use of their mobile and smart technology;

f. Explain the sanctions staff will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones;

g. Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation

h. Put in place robust filtering and monitoring systems to limit students' exposure to the 4 key categories of risk (described above) from the Centre's IT systems

i. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the RBR community. RBR can use the DfE's https://www.gov.uk/guidance/plan-technology-for-your-school to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

j. In addition to clause 9.27.i (above), The DfE has published a tool to support in the safe use of generative artificial intelligence. It explains how filtering and monitoring requirements apply to the use of generative AI in education. https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations

k. RBR will consider taking appropriate action in accordance with the security standards

set out in the DfE's guidance (https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges) which has been developed to help improve the resilience of education settings against cyber-attacks.

9.28 This section summarises RBR's approach to online safety and mobile phone use. For comprehensive details about the Centre's policy on online safety and the use of mobile phones, please refer to the E-Safety (online) policy and mobile phone policy, which can be found on the RBR website.

# 10 Procedures

10.1 RBR staff will actively work with each relevant Children Advice and Duty Service (CADS) and follow procedures required by them. The Centre's Lead for Safeguarding and Child Protection (DSL), Deputies and contact details are:

| Role | Name | Contact details |
|---|---|---|
| Head of Centre & Designated Safeguarding Lead (DSL) | Michelle Masters | michelle.masters@reading.rblc.org.uk 0118 958 3004 |
| Deputy Head Pastoral & Deputy DSL | Sarah Doran | sarah.doran@reading.rblc.org.uk 0118 958 3004 |

10.2 The following members of staff are also trained to Designated Person standard:

| Role | Name | Contact details |
|---|---|---|
| Deputy Head Academic (Interim) & Deputy DSL | Caroline Oke | caroline.oke@reading.rblc.org.uk 0118 958 3004 |
| Outreach Manager | Sam Buller | sam.buller@reading.rblc.org.uk 0118 958 3004 |
| Lead Therapist | Caroline Uwais | caroline.uwais@reading.rblc.org.uk 0118 958 3004 |

10.3 The nominated trustees for Safeguarding and Child Protection are:

| Role | Name | Contact details |
|---|---|---|
| Trust Lead for Safeguarding & Child Protection | Alika Gupta | alika.gupta@reading.rblc.org.uk |

10.4 The trustees will:

a. appoint a senior member of staff, from the leadership team to the role of Designated Safeguarding Lead (DSL);

b. ensure that the DSL for the Centre takes lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, Designated Personnel (DP), the lead responsibility for child protection remains with the DSL and cannot be delegated;

c. ensure that the roles of DSL and DP are explicit in the role holders' job descriptions;

d. ensure that the DSL has the appropriate status and authority within the Centre to carry out the duties of the post;

e. give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters (see Keeping Children Safe in Education, Sept 2025, Annex B);

f. ensure that the DSL and deputies have undertaken the required training, that this training is updated at least every two years and recorded appropriately;

g. ensure that in addition to the formal training set out above, the DSL and DPs refresh their knowledge and skills (e.g., via bulletins, meetings or further reading) on an ongoing basis throughout the academic year;

h. ensure that the DSL have access to peer support across other Centres;

i. ensure that every member of staff, and the trustee members know who the designated personnel are, that concerns are taken seriously and the procedures for passing them on will be a key element of our induction process;

j. ensure that the DSL or Deputies are available (during Centre hours, during term- time) to discuss any safeguarding concerns - should there be some unavoidable reason (e.g., multiple illness) why there is not a trained person on site, staff should contact the head office who will ensure that a person trained to DSL level makes contact with the appropriate member of staff;

k. ensure that the Designated Safeguarding Lead (and deputies) and all staff are familiar with the Prevent Duty guidance with the revised Prevent Duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with Centres (and also covers childcare);

l. ensure that all staff are aware that they may make direct contact with the appropriate (CADS);

m. nominate a Trustee for safeguarding and child protection and ensure that person undertakes appropriate training;

n. ensure every member of staff and every Trustee knows:
   i. the name of the designated person/s and their role;
   ii. how to identify the signs of abuse, neglect and exploitation;
   iii. how to pass on and record concerns about a student;
   iv. that they have an individual responsibility to be alert to the signs and indicators of abuse, neglect and exploitation and for referring child protection concerns to the DSL or Deputies;
   v. that they have a responsibility to provide a safe environment in which students can learn;
   vi. where to find the inter–agency procedures on the relevant CADS website;
   vii. their role in the early help assessment process;
   viii. the process for making referrals to children's social care;
   ix. how to use the CPOMS management information system effectively.

o. ensure all staff undergo safeguarding and child protection training at induction (as described in clauses 9.7- 9.9 of this policy);

p. ensure that staff training is regularly updated, and that, in addition to this training, all staff receive regular safeguarding and child protection updates as required but at least annually;

q.  ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to students and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies (NB staff will be directed to guidance in para 76, section 1 of Keeping Children Safe in Education 2025 should they feel that any concerns they have not been appropriately responded to. This includes an updated link to an NSPCC helpline);

r.  ensure staff are aware that they do not need parental / carer permission before making a referral;

s.  ensure that parents / carers are informed of the responsibility placed on the Centre and staff in relation to student protection by setting out these duties on the website and informing the parents / carers during initial interviews;

t.  ensure that this policy is available publicly via the centre website.

u.  In any situation where any student is educated 'off site,' the centre and the provider will have clear procedures about managing safeguarding concerns between them. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the centre.

10.5  (RBR uses the CPOMs' management information system. All staff will be trained in the use of this system as part of their induction. Staff have their own login details, which are confidential. Staff are required to log a concern immediately. That concern will immediately be flagged up to the centre DSL who will take appropriate action.)

### Liaising with Other Agencies

10.6  As described in Keeping Children Safe in Education 2025 (KCSIE), RBR has a pivotal role to play in multi-agency safeguarding arrangements. The Trust should ensure that they contribute to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children'. It is especially important that RBR understands its role in terms of its safeguarding partner arrangements.

10.7  Safeguarding partners (the local authority; Integrated Care Boards for an area within the local authority; and the Chief Officer of police for an area any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard, protect and promote the welfare of local children, including identifying and responding to their needs.

10.8  The safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement the three safeguarding partners consider may be required to safeguard and promote the welfare of students with regard to local need. The three safeguarding partners must set out in their published arrangements which organisations and agencies they will be working with, and the expectations placed on any agencies and organisations by the new arrangements.

10.9  The DSL and safeguarding trustee will ensure that they are fully conversant with the plans of the safeguarding partners.

10.10  RBR will:

a.  work to develop effective links with relevant services to promote the safety and welfare

of all students;

b. co-operate as required, in line with 'Working Together to Safeguard Children', 2023, with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups;

c. notify the relevant Social Care Unit immediately if:

   i. it should decide to exclude a student who is subject to a child protection plan (whether fixed term or permanently);

   ii. there is an unexplained absence of a student who is subject to a child protection plan;

   iii. there is any change in circumstances to a student who is subject to a child protection plan.

d. ensure that, when a student who is subject to a child protection plan moves to another provider, information is transferred to the new provider immediately. The DSL will also ensure that all involved agencies and the CADS are informed;

e. ensure that, when the police attend RBC to investigate or gather information on an incident, to liaise with the Head of Centre to inform them of issues. This should include ensuring that an "Appropriate Adult" is present if a student is interviewed by police.

### Record Keeping

10.11    RBR will:

a. keep clear, detailed, accurate, written records of concerns about students (noting the date, event and action taken), even where there is no need to refer the matter;

b. these records will be held on the CPOMs management information system (purpose built and secure), and for which staff are trained, have their own logins and are encouraged to record all concerns;

c. ensure all relevant child protection records are sent to the receiving Centre or establishment when a student moves Centres (within 5 days for an in-year transfer or within first 5 days of the start of a new term) in accordance with Keeping Children Safe in Education, September 2025, and the 'Education Child Protection Record Keeping Guidance' - the DSL will consider whether it would be appropriate to share information with the new education setting in advance of a student leaving;

d. make parents/carers aware that such records exist except where to do so would place the student at risk of harm;

e. ensure all actions and decisions are led by what is considered to be in the best interests of the student;

### Confidentiality and information sharing

10.12    It is important that the Trustees and managers are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about RBR's obligations and how to comply, including protecting personal information, and providing access to official information.

10.13    In addition, the DfE's Data Protection guidance for schools, helps staff and trustees

understand how to comply with data protection law, develop appropriate data policies and processes, know what staff and student data to collect, keep and follow good practices for preventing personal data breaches.

10.14    The General Data Protection Regulations, 2018, does not prevent Centre staff from sharing information with relevant agencies, where that information may help to protect a student.

10.15    RBR will:

   a.    ensure staff and Trustees adhere to confidentiality protocols and that information is shared appropriately and in a timely manner;

   b.    ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard students (as set out in Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018);

   c.    ensure that if a member of staff receives a Subject Access Request (under the GDPR 2018) from a student or parent, they will refer the request to the DSL or Head of Centre;

   d.    ensure staff are clear with students that they cannot promise to keep secrets.

10.16    The Designated Safeguarding Lead will:

   a.    disclose information about a student to other members of staff on a 'need to know' basis - parental consent may be required.

   b.    aim to gain consent to share information and be mindful of situations where to do so would place a student at increased risk of harm - information may be shared without consent if the DSL believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a student in a timely manner.

   c.    The DSL will have to balance the victim's wishes against their duty to protect the victim and other students;
      i.    Parents or carers should normally be informed (unless this would put the victim at greater risk);
      ii.   The basic safeguarding principle is: if a student is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority's children's social care;
      iii.  Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

   d.    record when decisions are made to share or withhold information, who information has been shared with and why (see Working Together to Safeguard Children, 2023);

   e.    seek advice about confidentiality from outside agencies if required (see Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018).

10.17    Staff should never promise a student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests.

10.18    Regarding anonymity, all staff will:

   a.    Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal

justice system;

b. Do all they reasonably can to protect the anonymity of any students involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for students involved;

c. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities;

10.19 The government's information sharing advice for safeguarding practitioners includes 7 'golden rules for sharing information and will support staff who have to make decisions about sharing information.

10.20 If staff are in any doubt about sharing information, they should speak to the DSL, or deputy.

10.21 Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff.

### Communication with Parents/Carers

10.22 RBR will:

a. ensure that parents/carers are informed of the responsibility placed on the centre and staff in relation to student protection by setting out its duties on RBR's website;

b. undertake appropriate discussion with parents/carers prior to involvement of another agency, unless the circumstances preclude this action;

c. seek advice from Social Care if the centre believes that notifying parents could increase the risk of harm to the student - particular circumstances where parents may not be informed include any disclosure of sexual abuse or physical abuse where the student has an injury;

d. record what discussions have taken place with parents or if a decision has been made not to discuss it with parents and record the reasons why - records may subsequently be disclosable to relevant partner agencies if child protection proceedings commence.

### Dealing with Sexual Violence and Sexual Harassment between students

10.23 RBR recognises that sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature,' such as sexual comments, sexual taunting, upskirting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation, coercion and threats.

10.24 RBR will:

a. be clear that sexual violence and sexual harassment will not be tolerated;

b. ensure that students understand the law child-on-child abuse is there to protect them rather than criminalise them;

c. provide training for staff on how to manage a report of sexual violence or sexual harassment;

d. make decisions on a case-by-case basis;

e. reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when making decisions;

f. implement measures to keep the victim, alleged perpetrator and, if necessary, other students and staff members, safe;

g. record any risk assessments and keep them under review;

h. give consideration to the welfare of the victim(s) and perpetrator(s) in these situations and any necessary support for siblings following incidents;

i. liaise closely with external agencies, including police and social care, when required.

10.25 Further guidance can be found in <u>Keeping Children Safe in Education - Part Five, September 2025</u>, <u>Sexual violence and sexual harassment between children in schools and colleges, May 2018</u>, and <u>Sexting in schools and colleges: Responding to incidents and safeguarding young people published by the UK Council for Child Internet Safety</u> (<u>UKCCIS</u>).

## 11   Allegation Management

11.1 RBR will operate safer recruitment practices including ensuring appropriate Disclosure and Barring Service (DBS) reference and pre-recruitment online search checks are undertaken on all short-listed applicants according to part three of Keeping Children Safe in Education, September 2025. As such, RBR can use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the DfE's web page.

11.2 RBR has a separate Safe Recruitment policy that should be read in conjunction with this policy and provides greater detail regarding the Centre's commitment to ensuring that no one working for the RBR poses any threat whatsoever to the welfare of its students.

11.3 All interviewing panels will include at least one person who has undertaken up-to-date Safer Recruitment training, and all recruitment processes will be overseen by an appropriately trained member of staff.

11.4 The following members of staff have undertaken safer recruitment training:

a. Michelle Masters

11.5 RBR should also carry out a section 128 (Education and Schools Act 2008) check for Trustees, Using GOV.UK schools can check if a person they propose to recruit a Trustee who is barred as a result of being subject to a section 128 direction. There is no requirement for RBR to record this information on the single central record, but it can if it chooses to do so.

11.6 Staff who have concerns (including any low-level concern) about a member of staff (including a supply teacher, volunteer or contractor posing a risk of harm to students, should speak to the Head of Centre as soon as possible. If the concerns/allegations are about the Head of Centre staff must speak to the Chair of Trustees. The relevant party will subsequently follow the procedures set out in part four of Keeping Children Safe in Education, Sept 2025 and consult with the 'Local Authority Named Senior Officer."

11.7 As an independent organisation, RBR has a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct,' 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence.' If advice is required as to whether an allegation against a teacher is

sufficiently serious to warrant referral to the TRA, staff will consult 'Teacher misconduct: the prohibition of teachers (October 2015)' and/or the Teaching Regulation Agency website.

11.8    The Local Authority Named Senior Officer will liaise with the Local Authority Designated Officer (LADO) ensuring that all allegations are reported to the LADO within one working day. Following consultation with the LADO, the Local Authority Named Senior Officer (LANSO) will decide on all further action to be taken.

11.9    As required by Keeping Children Safe in Education, 2025 if an allegation is made against anyone working at RBR, every effort will be made to eradicate all unnecessary delays. RBR will not undertake their own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can be held informally without naming the Centre or individual.

11.10   RBR will report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services The Centre has ceased to use because their practice has met the DBS referral criteria i.e., they have caused harm or posed a risk of harm to a student.

11.11   Ceasing to use a person's services includes dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Those staff compiling reports will seek to include as much evidence about the circumstances of the case as possible. Failure to make a report when required constitutes an offence. "Compromise agreements" cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation.

11.12    RBR has a legal duty to respond to requests  for information from the DBS.

11.13   The Centre will ensure that any disciplinary proceedings against staff relating to student protection matters are concluded in full even when the member of staff is no longer employed at RBR and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

11.14    It is recognised that a student may make an allegation against an innocent party, possibly because they are too afraid to name the real perpetrator. It is rare for a student to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. Although all allegations will be rigorously investigated, and staff may be suspended during those investigations, the principle of innocence until guilt is proven remains paramount.

11.15    Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is neither mandatory, nor automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students or they are protected.

11.16    The centre will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/carers as advised within the Staff Code of Conduct. As part of the induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all students.

11.17    The DSL will ensure that staff and volunteers are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

11.18    The DSL and safeguarding Trustee will further ensure that all communication between students and adults, by whatever method, is transparent, takes place within clear and explicit professional boundaries, and is open to scrutiny.


## 12       Complaints Against Staff

12.1    Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.


## 13       Complaints Against individuals/Organisations Using RBR for Student Related Activities

13.1    RBR does not allow its premises to be used by any individual or organisation for student (or child) related activities.  However, where a complaint is received about any individual or organisation external to RBR, our normal safeguarding policies and procedures will be applicable and adhered to and RBR will contact the LADO accordingly.


## 14       Whistleblowing

14.1    The Centre has a separate whistle-blowing policy that covers concerns regarding the way the Centre safeguards students – including poor or unsafe practice, or potential failures. The separate policy is available on our website and Staff Handbook.


## 15       Legislation and Statutory Guidance

15.1    This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook. RBR complies with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

15.2     This policy is also based on the following legislation:

   a.   Part 3 of the schedule to the Education (Independent Centre Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students (students) at the schools (Centre)

   b.   Part 1 of the schedule to the Non-Maintained Special Centres (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of students at RBR.

   c.   Education and Skills Act (Gov. UK 2008), putting a duty on all young people in England to participate in education or training until the age of 18. It also amends legislation about the regulatory framework for inspection of independent educational institutions. The Act also includes a number of miscellaneous provisions in relation to admissions, behaviour, National Curriculum assessment arrangements, considering the views of children, the Qualifications and Curriculum Authority (QCA) and schools forums.

   d.   The Children Act 1989 (and 2004 amendment), which provides a framework for the

care and protection of children.

e. Teacher misconduct: the prohibition of teachers (Gov.UK October 2015, last updated in 2023) which sets out guidance professional conduct hearing panels when reviewing teacher misconduct.

f. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

g. Children Missing Education (Gov.UK August 2025), which sets out Statutory guidance for local authorities and advice to other groups, helping children who are missing in education to get back into it.

h. Working Together to Improve School Attendance is now statutory guidance for education settings, Trustees and local agencies to work together in order to maintain high levels of attendance. It includes details of the roles and responsibilities for each party. https://www.gov.uk/government/publications/working-together-to-improve-school-attendance#:~:text=Guidance-Working%20together%20to%20improve%20school%20attendance,-Guidance%20for%20schools

i. Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

j. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

k. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

l. Statutory guidance on the Prevent Duty, (Prevent Duty Guidance: for England and Wales Gov.UK (July 2015) which explains the Centre's duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

m. Sexual Offences Act (Abuse of Trust) (Gov. UK 2003), that refers to certain roles and settings where an adult has regular and direct contact with children, making it illegal for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

n. The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

o. The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Trustees and Head of Centre should carefully consider how they are supporting their students with regard to these characteristics. The Act allows RBR to take positive action to deal with particular disadvantages affecting students (where RBR can show it's proportionate). This includes making reasonable adjustments for disabled students.

p. The Public Sector Equality Duty (PSED), which explains that RBR must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some

students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

q. General Data Protection Regulation - GDPR (May 2018) which controls how personal information is collected, stored, used, shared and destroyed by organisations. Under the legislation, students have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased.

r. The Information Commissioner (ICO) has published on keeping employment records:https://actnow.org.uk/media/articles/The_Information_Commissioner_Employment_Practices_Code_commentary.pdf#:%7E:text=The%20Employment%20Practices%20Code%20is%20intended%20to%20provide,best%20practice%20in%20dealing%20with%20Data%20Protection%20issues

s. Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers (Gov.UK July 2018). The GDPR and Data Protection Act (2018) does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

t. Relationships, Sex, and Health Education (July 2025). The DfE provide revised statutory guidance on the Relationships, and Sex Education which states that, *"Children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships"* which can be gained through high quality evidence-based education. It is issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996, and updates the Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance 2019.

u. Filtering and Monitoring Standards for Schools and Colleges sets out the statutory responsibilities RBR has in keeping its students safe both on and online. Trustees should ensure BRB has appropriate filtering and monitoring systems in place. Details of the requirements can be found at: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

v. Cyber security standards are set out in a DfE document aimed specifically for schools and colleges: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

w. NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

x. The Lucy Faithfull Foundation has developed a HSB toolkit: https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/?utm_campaign=1540968_HSB%20Toolkit%20email_SOCIAL%20MEDIA&utm_medium=email&utm_source=Lucy%20Faithfull%20Foundation&dm_i=48W7,X10O,38NO7C,43A9L,1 which amongst other things, provides support, advice and information to young people regarding their own or someone else's sexual thoughts and behaviours.

y. Abuse - The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. https://www.csacentre.org.uk/research-resources/practice-

resources/helping-education-settings-identify-and-respond-to-concerns/

z.  The Children's Society and Home Office have produced a link to the preventing child exploitation: https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

15.3    This policy also complies with our funding agreement and articles of association.

# 16    Other RBR policies to be read in conjunction with this one.

a.  Safe Recruitment
b.  Whistleblowing
c.  E-safety
d.  Attendance
e.  Dealing with Allegations of Abuse against Staff
f.  Student Wellbeing and Personal Development
g.  Behaviour for Learning
h.  Anti-Bullying
i.  Staff Code of Conduct
j.  Data Protection
k.  PSHE and RSHE
l.  Complaints

**Appendix:**
**Procedures to follow if you have concerns about a student**

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                        ┌──────────────────────┐
                        │  You have concerns   │
                        │   about a student    │
                        └──────────────────────┘
                                   │
                  ┌────────────────────────────────────┐
                  │ Speak to the DSL and document       │
                  │ concern, noting the date, event     │
                  │ and action taken on CPOMs           │
                  └────────────────────────────────────┘
```

| You have concerns about a student |
| --- |

| Speak to the DSL and document concern, noting the date, event and action taken on CPOMs |
| --- |

| Referral not required. RBR takes relevant action and monitors locally | You or the DSL makes a referral to the local LA 's social care team (and call the police if appropriate) |
| --- | --- |

| If concerns escalate. Make a referral | Within 1 working day, a social worker makes a decision about the type of response required. |
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| LA's social care team takes action and informs the referrer. | No formal assessment required |
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| RBR considers early help assessment and accesses other support if necessary |
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| Staff keep the student's circumstances under review, and refer, if appropriate to ensure the circumstances improve. The student's best interest must always come first at all stages. |
| --- |