



## **SAFEGUARDING POLICY AND PROCEDURE**

### **1. Policy Statement**

This document sets out the policy and procedures of 'theRTproject' to ensure a safe creative learning environment for all young people and vulnerable adults. The policy applies to all students and staff at 'theRTproject'. We believe all individuals have a right to learn and develop within a safe environment and 'theRTproject' is committed to protecting all young people and adults, especially those vulnerable to abuse or harm.

'theRTproject' also recognises its responsibilities to protect all staff, students, and volunteers against unfounded allegations of abuse. This policy aims to ensure that young people and vulnerable adults, and all those who work with them, are safe and supported within 'theRTproject' and its organised activities. Staff will adhere to the guidance written in this policy, however where awarding bodies/collaborative partners have their own published procedures these may take precedent over the college policy.

### **2. Scope**

This policy is to be used by any member of staff or volunteer working directly with children and young people, and Adults at Risk. Children, young people, Adults at Risk and parents/carers are informed of the policy as appropriate, which is reviewed annually by 'theRTproject' senior staff and made freely available on the website.

This policy must be known, understood, and implemented by both staff and students. This includes support staff for SpLD Learners.

**Artistic Directors** should, at the appropriate time, introduce new members of staff to this policy and ensure visiting/associate staff such as mentors or SpLD support workers are also appraised.

Staff should use the induction period, or other appropriate time, to introduce and signpost learners to this policy.

### 3. Legislation

'theRTproject' is an Academy that delivers HE courses but also works with under 18s as part of its wider academic provision. 'theRTproject' understands that it has a duty to safeguard and protect young people in response to the relevant legislation which includes:

*The Education Act 2011, the Children Act 1989 and 2004, the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023, and the Prevent Duty under the Counterterrorism and Security Act 2021*

At 'theRTproject' for all our provision we adhere to the definition of safeguarding derived from current legislation. This states that '*Safeguarding relates to protecting children and adults who may be vulnerable from all forms of abuse or exploitation*'.

There is no exhaustive list of what may constitute abuse or exploitation, but it includes physical, emotional, sexual, financial, neglect, online abuse, domestic abuse, human trafficking, and discriminatory abuse. It also relates to broader preventative responsibilities that are wide-ranging concerning the welfare and well-being of children and enabling people to reach their full potential as well as to stay safe and healthy.

### 4. Responsibilities

PPA asks that all staff meet their responsibility to give full and active support for the policy by:

- Providing 'theRTproject' with a valid Disclosure and Barring Service (DBS) certificate every 3 years
- Providing 'theRTproject' with a valid Safeguarding Certificate every 3 years

Relevant staff will be required to undertake mandatory training in safeguarding essentials or attend workshops/training where the need is identified by the **COO, Designated Safeguarding Lead or Artistic Directors**.

'theRTproject' has a Designated Safeguarding Lead and a Safeguarding Team and ensures that their contact details are visible and accessible to all staff and students on site.

All staff are given annual guidance and support in team meetings prior to student induction to ensure everyone is aware of the latest policies and procedures. New staff should be provided with copies of all relevant documents to ensure they can adhere to all safeguarding guidelines.

All staff at 'theRTproject' must be committed to ensuring that a person who discloses abuse/harm is offered ongoing appropriate support after disclosure in conjunction with

our wellbeing support practices.

Staff should ensure that any records of a disclosure are stored confidentially.

**Artistic Directors** should ensure students are aware of the mechanisms for reporting bullying and abuse (for example via website and in class talks).

If a serious incident is disclosed relating to a young person or vulnerable adult, then the 'theRTproject' Safeguarding Team will refer the individual on to the relevant professional body if the person requests it or the situation requires it. This may include: Children's Social Care, Adult Social Care or another appropriate agency e.g. the Police or NSPCC, East Surrey College/ Local Safeguarding Children's Board (LSCB), Multi Agency Safeguarding Hub (MASH).

## **5. Actions to Implement and Develop Policy**

The Designated Safeguarding Team are responsible for investigating complaints and acting upon them. They are responsible for maintaining 'theRTproject's' safeguarding policy, for making referrals to relevant agencies, if appropriate, and overseeing any required training in safeguarding to staff, volunteers, and students. They must also maintain confidential records in relation to safeguarding and may be required to investigate incidents as required.

The Safeguarding Team are responsible for liaising with relevant external agencies as appropriate in relation to policy and practice, on-going training, record keeping.

Artistic Directors are responsible for ensuring that appropriate Disclosure and Barring Service (DBS) checks are undertaken, and up to date records maintained, as well as that the appropriate checks and references are taken up for staff and volunteers offered employment/volunteering opportunities at 'theRTproject'.

Artistic Directors are responsible for ensuring that activity is conducted in accordance with the 'theRTproject' Safeguarding Policy and Procedures, including reporting any instances where the policy might have been breached, informing HR of the potential need for further DBS checks and ensuring that staff are sent on safeguarding training.

All staff have a responsibility to report any concerns to the Artistic Directors or one of the Safeguarding Team.

## **6. Managing a Disclosure**

Staff will handle disclosures with sensitivity and as is appropriate, confidentiality. Disclosing abuse is difficult for variety of reasons. Some children and vulnerable adults do not disclose because they feel they will not be believed or be taken seriously. It is very important that staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down

barriers to disclosure. The chart below shows some things to do and those not to do when speaking to someone.

Do	Don't
<ul style="list-style-type: none"> <li>• Stay calm.</li> <li>• Recognise your feelings but keep them to yourself.</li> <li>• Use language that the person can understand.</li> <li>• Reassure the person: - telling you is doing the right thing - they are not to blame - you believe that they are telling the truth.</li> <li>• Listen carefully, record what the person says and keep these notes.</li> <li>• Explain what you will do next (i.e., tell the Designated Safeguarding Lead/one of the Safeguarding Team) in a simple and clear way.</li> <li>• Follow the standard procedure in telling the Safeguarding Lead/one of the Safeguarding Team and seeking advice and support for yourself.</li> </ul>	<ul style="list-style-type: none"> <li>• Panic or delay.</li> <li>• Express strong feelings of upset or anger.</li> <li>• Use jargon or express opinions.</li> <li>• Probe deeply for information.</li> <li>• Use leading questions.</li> <li>• Make them repeat the story.</li> <li>• Promise unconditional confidentiality.</li> <li>• Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than the Designated Safeguarding Lead or one of the Safeguarding Team.</li> </ul>

**STUDENTS SHOULD ALWAYS BE MADE AWARE THAT ANY DISCLOSURE WILL BE REPORTED TO THE DESIGNATED SAFEGUARDING LEAD AND THE SAFEGUARDING TEAM.**

### **7. Reporting a Concern / Disclosure**

This procedure below will be followed whenever a disclosure has been made, or there is a suspicion that a child or vulnerable adult is at risk of harm or has been abused. If in doubt about whether to make a written record (for example, you have a slight concern), you can contact the Designated Safeguarding Lead before submitting a written record. The default position is that staff should write a note of their concerns.

- The member of staff will make a detailed written record of the matter, using, if possible, the Disclosure Form below, and report it within twenty-four hours to the Designated Safeguarding Lead or one of the Safeguarding Team. In the case of an urgent concern, the member of staff will communicate the matter as soon as possible, and complete the written report afterwards.
- The Safeguarding Team will investigate the issue and assess the level of risk of harm.

- The Safeguarding Team will seek advice from external agencies where required to inform decision making about the appropriate course of action to be taken, sharing necessary information as appropriate to best protect the child or adult at risk, with their consent wherever possible.

Where risk of harm or abuse is identified, 'theRTproject' will act to best protect the child or vulnerable adult. 'theRTproject' will involve the child or vulnerable adult in decision making and act with their consent where possible. The Safeguarding Team will act without consent where this is in the best interests of the child or vulnerable adult.

'theRTproject' will support the child or vulnerable adult in understanding the risk of harm and encourage and empower them to take any appropriate action to mitigate that risk themselves, with support.

Where it is agreed that no immediate action needs to be taken, a programme of follow- up support will be agreed.

In the case of an allegation of abuse being made against a member of staff or a student, the individual concerned may be informed of the allegation, on the advice of the Local Authority and/or Police and may be removed from contact with children and vulnerable adults in line with the appropriate disciplinary process (staff or student).

Any internal disciplinary action arising from an investigation will be handled in accordance with the relevant disciplinary process (staff or student). 'theRTproject' assures all staff that it will fully support and protect anyone who, in good faith, reports his or her concerns that anyone is, or may be, abusing a child or vulnerable adult.

## **8. Allegations Against a Student**

Where an allegation is brought against a student on one of 'theRTproject's' courses, this will be handled in the same way as an allegation towards a member of staff and will also invoke the appropriate student disciplinary or misconduct policies, as necessary. [REDACTED]

If the matter is the subject of a criminal investigation 'theRTproject' is entitled to pursue its own or complementary confidential enquiries and disciplinary action. The Designated Safeguarding Lead will consult with the relevant agencies in such cases.

To maintain the integrity of the investigation, individuals who face an allegation may be advised to only discuss the substance of the allegation with his or her union or legal representative, immediate family or as directed by the investigating officer.

Following an investigation, disciplinary action may be taken as appropriate.

Information is shared and discussed between staff and relevant agencies on a need to-act basis only.

'theRTproject's local authority is the London Borough of Hounslow. If it is necessary to involve the local authority, we will refer to Surrey Safeguarding Children Board (<https://www.surreyscb.org.uk/>). Information is shared and discussed between staff and relevant agencies on a need-to-act basis only.

## **9. Recruitment, Vetting, Induction and Training of Staff**

'theRTproject' recognises that anyone may have the potential to abuse children and vulnerable adults in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with them.

'theRTproject' complies with its on-going duty to notify DBS with any relevant information regarding the conduct of any individual which the Academy considers having caused harm or pose a risk of harm to vulnerable groups.

'theRTproject' will implement appropriate recruitment procedures for personnel working on activities with children and/or adults at risk, having substantial access to children and/or adults at risk, access to children's personal information or images, or who through the course of their work are liable to find themselves in a position of trust. These procedures will include:

- Identity and Disclosure and Barring Service checks carried out by HR on the offer of a post which is likely to have significant contact with children and/or vulnerable adults. Two reference checks will be needed to confirm their suitability to work with children.
- For SpLD Mentors or support workers 'theRTproject' requires them to sign in and out of campus. They may also be asked to provide a DBS and/or identification to confirm their role before they can access the site. They will also be provided with, and expect to adhere to, a code of conduct on site.

## **10. Safeguarding all 'theRTproject' Students**

Under the Sexual Offences Act 2003, it is a criminal offence for a person to engage in a sexual relationship with a person under the age of 18 when they are in a position of trust in relation to that person. At 'theRTproject', all staff, volunteers and anyone formally representing 'theRTproject' are in a position of trust for this purpose. 'theRTproject' considers it unethical for staff and visiting professionals to enter sexual or romantic relationships with students over the age of 18, and failure to disclose any such relationship may result in disciplinary action being brought.

'theRTproject' programmes may involve off-site visits, performances, and trips away from 'theRTproject'. 'theRTproject' includes the safeguarding of under 18-year-olds and vulnerable adults in the pre-departure risk assessment procedure and makes appropriate arrangements on

the basis of this assessment. Beyond this, and the general requirements of this policy and procedure, no additional arrangements are made.

In normal circumstances 'theRTproject' deals directly with students (with whom it has a contractual relationship) and not with parents or other third parties, and this approach applies to students who are vulnerable adults or are under 18 years. 'theRTproject' has duties under data protection legislation to preserve the right to privacy and confidentiality of students. 'theRTproject' therefore only discloses information regarding students (including vulnerable adults or under 18-year-olds) to third parties (including parents, guardians and next of kin) in accordance with its Data Protection Policy.

## **11. Monitoring and Evaluation**

The Senior Management team ensure that the policy and related procedures are reviewed and monitored annually to stay fit for purpose.

Policy Updated: Feb 2026

Policy Review Due: Feb 2027