



Safeguarding and Safer Recruitment Policy

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Introduction

RHG Consult Ltd (RHG) are passionate about safeguarding our learners and have a statutory and moral duty to ensure that we safeguard and promote the welfare of children, young people and vulnerable adults.

This policy should be read in conjunction with our:

- PREVENT - Prevention of extremism and radicalisation policy
- On-line safety policy
- Staff Grievance policy
- Staff Handbook

The term **'staff'** refers to all full time and part time employees, and associates.

The term **'learner'** refers to any person undertaking a learning programme, qualification or apprenticeship with RHG with particular reference to:

- Children and young people up to the age of 18
- Vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or are or maybe unable to protect themselves against harm or exploitation)

This policy has been created with reference to 'Working Together to Safeguard Children (2020), SET Procedures 2015, Counter-Terrorism and Security Act (2015), Keeping Children Safe in Education (2021) and The Education and Training (Welfare of Children) Act 2021.

This policy focuses on how we support our learners through our understanding of Safeguarding, our implementation of safer recruitment and the training of our staff, and how we deal effectively with allegations against staff.

The Safeguarding and Safer Recruitment Policy for RHG reflects the importance of our responsibility to safeguard and promote the welfare of all our learners and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying. We are committed to providing a caring, friendly, and safe environment for everyone we work with. We believe every person should be able to participate in learning and work activities in an enjoyable and secure environment and be protected from harm.

The aims of this Policy are:

- To identify the expectations of staff in relation to safeguarding
- To ensure relevant and effective safeguarding practices are in place
- To ensure the right of every learner to learn within a safe environment
- To promote awareness to staff of the need to safeguard all learners but particularly children, vulnerable adults, and to recognise that safeguarding is everyone's responsibility
- To ensure that the fundamental rights and needs of our learners are observed

- To prevent the risk of abuse by offering pastoral support to all our learners
- To prevent the risk of abuse by ensuring procedures and standards are in place
- To raise awareness of different types of abuse and children in need issues
- To provide guidelines for staff in handling matters relating to actual or suspected child abuse
- To ensure that procedures and policies are in place to deter potential, unsuitable individuals from applying to RHG and to reject during our interview stages any applicant where we doubt their suitability

While our safeguarding and safer recruitment policy applies to all our learners and staff, we recognise that:

Safeguarding Children is defined as: protecting children from maltreatment; preventing impairment of children health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and keeping action to enable all children to have the best outcomes (Keeping Children Safe in Education):

Safeguarding Adults is defined as people aged 18 years or over who may need or receive community care services by reason of mental health, disability, age or illness, and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health. March 2000).

Our policies and procedure will be applied, with appropriate adaptations to all learners.

Types of abuse and neglect

RHG uses the following as definitions of abuse and neglect.

Abuse: a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. The abuse may be committed by an adult or adults or a child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness.

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of someone such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. This may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing victims to frequently to feel frightened or in danger, or the exploitation or corruption of other.

Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015). The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Sexual abuse: Sexual abuse involves forcing anyone against their will to take part in sexual activities but particularly applies to forcing or enticing a child, young person or vulnerable adult to take part in sexual activities. It may not necessarily involve a high level of violence, for example the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Neglect: Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to basic emotional needs. This may particularly apply to vulnerable adults for whom neglect is an often under reported or challenged concern.

Forced Marriage: This involves a young person, or vulnerable adult being forced into a marriage against their will.

Child Sexual Exploitation: Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

Gang Culture/County Lines: County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse. Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

Child Trafficking: Child trafficking is a form of abuse. It involves the recruiting, moving, receiving, and harbouring of children with purpose of exploiting them (HH Department for Education, 2011) Child trafficking is a form of modern slavery. Children are trafficked for:

- Sexual exploitation
- Criminal activity
- Moving drugs
- Benefit fraud
- Selling pirated goods

- Forced marriage
- Domestic servitude (also known as Modern Slavery)
- Forced labour
- Illegal adoption
- Unreported private fostering

Domestic Abuse: Women's Aid define domestic abuse as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.

This can encompass but is not limited to the following types of abuse:

- Psychological and/or emotional
- Physical and Sexual
- Harassment and stalking
- Financial or economical
- On-line or digital

Controlling/coercive behaviour: is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable.

Female Genital Mutilation: This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal. Further information can be found in RHG's PREVENT – Prevention of extremism and radicalisation policy,

Financial or Material Abuse: Applies to largely vulnerable adults and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Bullying: Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as RHG operates a zero tolerance approach. Bullying of this nature is also against the law.

Bullying can take many forms and includes:

- Emotional: Being excluded or tormented such as hiding things or making threatening gestures
- Physical: Pushing, kicking, punching or any use of aggression and intimidation
- Racial: Racial taunts, use of racial symbols, graffiti and gestures
- Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- Verbal: Name calling, spreading rumours and teasing

- **Cyber:** All areas on internet, such as email, the internet and chat room misuse. Mobile threats by text message and calls. Misuse of associated technology such as camera and video facilities, sexting.
- **Online:** Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people and vulnerable adults may be particularly targeted to cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.

Cyberbullying: involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications. Children using social media unsupervised are particularly at risk. Vulnerable adults are also particularly at risk as they may be more emotionally and mentally susceptible to the abuse.

- **Flaming:** Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- **Denigration:** Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- **Exclusion:** Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- **Outing:** Sharing secrets about someone online including private information, pictures, and videos.
- **Impersonation:** Tricking someone into revealing personal information then sharing it with others.
- **Harassment:** Repeatedly sending malicious messages to someone online.
- **Cyberstalking:** Continuously harassing and denigration including threats of physical harm

Roles and Responsibilities

Our Designated Safeguarding Lead is Kelly Jackson

Our Designated Safeguarding Officer is Amber Parker

Our Director with Responsibility for Safeguarding is Lee Patterson

Kelly Jackson is responsible for the implementation of our Safeguarding Policy and for raising safeguarding awareness across our staff and of overseeing the referral of cases of suspected abuse or allegations of abuse.

All staff are responsible for safeguarding learners and other staff and must remain vigilant at all times of the risk to learners and staff of abusive behaviour from different sources including members of their family, other learners, employers and other RHG staff. Any suspicion, allegation or incident of abuse must be referred to Kelly Jackson for full investigation.

If the alleged perpetrator of abuse is another member of staff the circumstances will be investigated fully under RHG's Disciplinary Procedure. If it is agreed to be a safeguarding matter a Safeguarding Incident Report Form will be completed and sent to the Designated Safeguarding Lead within 24 hours. If necessary, RHG will refer details of the circumstances to the relevant LADO (Local Authority Designated Officer).

Responsibilities of the DSL include:

- Ensuring safeguarding and wellbeing concerns are recorded using the Safeguarding Incident Report form
- Ensuring cases of suspected abuse or allegations are appropriately referred to relevant agencies in a timely manner
- Providing advice and support to staff and learners on issues relating to Safeguarding and PREVENT
- Ensuring all records of any Safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral)
- Ensuring all staff and learners have access to the Safeguarding and other relevant policies
- Ensuring Safer Recruitment practices are in place
- Liaising with the Local Authority Designated Officers (LADO) when appropriate

Responding to Disclosure and reporting responsibilities:

People are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the person is saying you are already helping the situation. The following points are a guide to help staff respond appropriately.

Actions to be taken by the person being disclosed to:

- React calmly
- Avoid asking direct or leading questions of the person disclosing other than those seeking to clarify your understanding of what has happened. The person disclosing may be formally interviewed by the correct authority and they should not have to repeat their account on several occasions. (Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation)
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by someone who may have a speech impairment or where English is not their first language
- Reassure the person making the disclosure, but **do not make promises of confidentiality** which may not be feasible as the situation develops. Explain to them that you will have to share your concerns with the **Designated Safeguarding Lead** who has the authority to act.
- Record in writing on the Safeguarding Incident Report Form all the details that you are aware of and what was said using the person's own words.

Some key things to remember if a child, young person or vulnerable adult tells you about possible abuse:

- Never promise confidentiality – you will have to break it, and with it the persons trust in you.
- Listen carefully and stay calm – you need to listen without making assumptions or judgements.
- Do not interview a child or vulnerable adult. Only ask questions to clarify your understanding. Never ask leading questions or act as an investigator.
- Reassure them that by telling you, they have done the right thing.
- Inform them that you must pass the information on, but that only to those that need to know. Inform them who you will report the matter.
- Find out what the child or vulnerable adult would like to happen, but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else).

- For learners under the age of 18, inform them that their wishes regarding the action to be taken will be noted, however this will not affect the final decision to make a referral.
- Use the Safeguarding Incident Form to gather key information and to record your discussion
- Do not investigate concerns or allegations yourself, but report them immediately to the Designated Safeguarding Lead
- Adult learners have the right to make their own choices where they are capable of doing so.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned in a safeguarding incident. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- The Designated Safeguarding Lead
- The parents or carers of the person who is alleged to have been abused
- The Police/Social Care Services
- The Senior Management Team where appropriate
- The person making the allegation
- The alleged abuser (and parents or carers if the abuser is a child or young person)

Reporting FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl/woman’s age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present.

You should act with at least the same urgency as is required by your local safeguarding processes. A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the girl/woman (or a child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made. If you think you are dealing

with such a case, you are strongly advised to contact your Designated Safeguarding Lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl/woman is the priority.

Concerns about individuals who are not learners with RHG

For people who are not learners with RHG, the referral must go back to an appropriate person of the organisation to which they are attached, usually the HR department or Safeguarding team. RHG's Designated Safeguarding Lead will make the contact. Where a concern is raised about a child, young person or vulnerable adult who is not a learner with RHG and not attached to any organisation, then a Safeguarding Incident Report Form must be completed and RHG's Designated Safeguarding Lead will report to the relevant Local Authority Designated Officer

Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a member of staff has:

- Behaved in a way that has harmed or may have harmed a child, young person, vulnerable adult or another adult
- Possibly committed a criminal offence against or related to a child, young person, vulnerable adult or another adult
- Behaved towards a child, young person, or vulnerable adult in a way that indicates that she/he is unsuitable to work with children, young person or vulnerable adult.

Following an allegation of abuse against a member of staff, the Designated Safeguarding Lead would inform the RHG's Directors (or an appropriate senior member of staff if an RHG Director was the alleged perpetrator) as well as the appropriate authority (LADO, Police, etc). The member of staff would be suspended until the outcome of the allegation is confirmed.

Safer Recruitment and Selection

RHG aims to recruit and develop skilled and motivated staff who will deliver and support outstanding learning opportunities to all learners. An effective recruitment and selection process is a major contributor to this aim. RHG is committed to safeguarding and promoting the welfare of children and adults at risk of harm, and expects all its staff to share this commitment. The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 with the purpose to reduce the risk of harm to children and vulnerable adults.

RHG will apply principals of Safer Recruitment to **all** staff working with children, young adults and vulnerable adults. It will be the employers' responsibility to ensure that their staff, sub contractors and volunteers have the relevant DBS disclosures. RHG will not undertake DBS checks for learners.

Every interview panel must have at least one member who has received Safer Recruitment training. Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or vulnerable adults in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or vulnerable adults in regulated activity will be made by the Directors of RHG.

Our job adverts for positions which require remote or face to face contact with learners will clearly state that Enhanced DBS clearance will be sought prior to the applicant taking up a position at RHG. Two references will also be taken prior to an applicant taking up a position at RHG, both of which will ask if the referee has any concerns about the applicant working with children or vulnerable adults.

Staff contracts will include the provision that continued employment with RHG is subject to successful completion of a DBS check every 5 years.

Staff Safeguarding training and staff records

All new staff will receive Safeguarding and PREVENT training during their induction. RHG will provide annual Safeguarding and Prevent training which will be recorded as part of staff CPD. RHG will keep a central record of staff Safeguarding and Prevent CPD, DBS certificate numbers, certificate date and date of renewal.

Updates to and further training regarding Safeguarding, Prevent and British Values will be completed during staff meetings and promulgated through staff newsletters and learner progress meetings.

Covid-19 Safeguarding Update

RHG are taking steps to ensure that our staff, learners, employers, and anyone else we come into contact with are kept as safe as possible. In an attempt to limit the spread of the Covid-19 virus, all work concerning RHG, including apprenticeships, other learning and management meetings, are being conducted remotely. We will review this with our learners and stakeholders in line with government guidelines at regular intervals

RHG recognise these are unprecedented times and that people may be experiencing feelings of uncertainty and anxiety. However, we are committed to promoting positive mental health and wellbeing and we will do all we can to ensure our staff and learners have access to the support they require.

Safeguarding contacts

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0345 6039311

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0345 6039311

Signed:



Name:

Lee Patterson

Position:

Managing Director

Date:

13/10/2023

Date of next review:

12/10/2024