



R.T.S recruitment

SAFEGUARDING POLICY

Date: 23rd June 2024

Review date: 23rd May 2025

Approved by: Darren Bryson & Nathan Schall – Directors

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1.INTRODUCTION

The Purpose and Scope of This Policy Statement

R.T.S Recruitment ltd fully recognises its responsibilities for safeguarding children. The welfare and safety of Students and vulnerable service users is at the heart of our ethos and in everything we do. In this policy, a 'child' means all children and young people below 18 years of age. In accordance with relevant law and guidance this policy details our procedures for safeguarding and child protection. It is applicable to the whole school community.

Safeguarding and promoting the welfare of children is everyone's responsibility. This policy applies to all Internal Employees and Temporary Workers and will be widely promoted and be mandatory for everyone involved in R.T.S this policy is the Safeguarding Policy for R.T.S recruitment Ltd. Failure to comply with this policy and R.T.S recruitment Ltd.'s safeguarding procedures may result in disciplinary action being taken, including termination of employment and/or contract.

All Temporary Workers placed by R.T.S Recruitment Ltd are expected to familiarize themselves with arrangements for safeguarding Children and Adults at Risk in the organization where they are placed and to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

whether they work or volunteer in the school. Everyone has a role to play in child protection and safeguarding. R.T.S. Recruitment - where appropriate - adopts a whole-school approach to safeguarding children. All staff and volunteers will ensure that their approach and actions are child-centred– putting the wishes and feelings of victims at the heart of any safeguarding response. This means that they'll consider, at all times, what is in the best interests of the child.

The purpose of this policy statement is:

- To protect children and young people in education from harm. This includes the children of adults who may be recipients of our services.
- To provide staff, volunteers and clients, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working for or on behalf of R.T.S Recruitment, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff, and students.

2.SAFEGUARDING CHILDREN

R.T.S Recruitment recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Enabling children to have optimum life chances, so they can enter adulthood successfully.
- Taking action to enable all children to have the best outcomes.

Child protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

As part of meeting a child's needs, R.T.S Recruitment:

- Recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect.
- Knows that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. R.T.S.

Recruitment recognises the government's seven golden rules of information sharing. Where any doubt exists, staff will seek support from the DSL.

- Recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent. If it is not possible to gain consent, or if to gain consent would place a child at risk, it cannot be reasonably expected that a practitioner gains consent.
- Recognises the importance of confidentiality in all data R.T.S. Recruitment holds and in particular in relation to safeguarding and child protection records.
- Will identify children who may benefit from the Early Help process and make timely disclosures to the Local Authority to enable that process to begin, working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- Recognises that mental health issues can be an indicator of abuse and neglect, and will share any such concerns appropriately.
- Will identify students who may be suffering from significant harm and make child protection referrals
- Will identify students who need extra help and make appropriate referrals, including to early help processes, to prevent concerns escalating.

R.T.S Recruitment also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside home or school and can occur between children outside of school. All staff should be considering wider environmental factors that are present in a child's life which are a threat to their safety and/or welfare. This information will also form part of any referrals R.T.S. Recruitment makes, if R.T.S. Recruitment considers this appropriate.

3.LEGISLATION AND GUIDANCE

This policy for R.T.S Recruitment Ltd is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- [Keeping Children Safe in Education \(2021\)](#).
- [Working Together to Safeguard Children \(2018\)](#).
- [Governance Handbook](#).

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM.

- The Rehabilitation of Offenders Act 1974 which outlines provisions for when people with criminal convictions can work with children.
- ‘Regulated activity’ in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- Schools’ “PREVENT” duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory Guidance on the Prevent Duty.

Other statutory provisions and guidance relevant to child protection and safeguarding include:

- The Education Act 2002 (Section 175).
- The School Staffing (England) Regulations 2009 Schedule 2, which covers information which must be entered into the Single Central Register, and Section 9, which stipulates that at least one person per interview panel must be trained in safer recruitment.
- The Education (Pupil Information) (England) Regulations 2005.
- The Sexual Offences Act, 2003, Home Office.
- Teaching Online Safety in Schools, 2019, DfE.
- Guidance on Sharing Information.
- Guidance on Peer-on-Peer Sexual Abuse.
- Guidance on Nudes and Semi-Nudes.
- Teaching Standards.

R.T.S Recruitment has also read and incorporated Ofsted’s review of sexual abuse in schools and colleges published in June 2021 into this and connected policies and procedures.

4. RELATED POLICIES

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the policies and procedures referred to below:

- The staff safer recruitment and selection processes
- Dealing with allegations against members of staff.
- Dealing with allegations against Temporary workers
- Recording concerns and information sharing.
- Code of conduct for temporary workers
- Photography and sharing images guidance.
- Online safety.
- Anti-bullying.
- Managing complaints.
- Whistleblowing.
- Health and safety.
- Induction, training, supervision, and support.
- Social media policy.

5. Recruitment and Selection Process

R.T.S Recruitment Ltd is also committed to protecting Children and Adults at Risk through a careful recruitment and selection process (Safer Recruitment Policy), a Whistleblowing Policy and guidance on appropriate behaviour (Temporary Worker Code of Conduct). These policies should be read alongside this policy.

R.T.S Recruitment Ltd.'s rigorous procedures, following ASPCo's Compliance + process ensures that any Temporary Worker found to have a history of unacceptable conduct or practice, will not be placed.

Designated Safeguarding Lead/Data Protection Officer (DSL/DPO)

The role of R.T.S Recruitment's DSL/DSO includes:

- Ensure all Internal Employees and Temporary Workers receive appropriate safeguarding and child protection training, including online safety, at induction and ongoing, relevant to their roles.
- Address all safeguarding concerns or reports of abuse from Internal Employees, partner agencies, Temporary Workers, or third parties.
- Maintain confidential, detailed records of any safeguarding concerns, reports, or referrals involving Temporary Workers or Children/Adults at Risk.
- Collaborate with Safeguarding Leads/Officers in partner organizations to ensure effective safeguarding practices.
- Provide support, guidance, and expertise to employees and workers with safeguarding concerns, and liaise with other agencies as needed.
- Support and assist staff involved in safeguarding incidents, including addressing unsafe practices.

- Refer abuse allegations or safeguarding concerns to relevant social care services, police, or Local Authority’s Designated Officer (LADO), following local safeguarding procedures.
- Report concerns to the Disclosure and Barring Service (DBS) if an employee or worker is dismissed or resigns amid serious concerns, and liaise with DBS as required.
- Keep senior management informed of safeguarding incidents and outcomes.
- Work with senior management on training programs and skill development for Internal Employees and Temporary Workers.
- Oversee the development and annual review of safeguarding policies.

R.T.S Recruitment’s DSL

Designated Safeguarding Lead: Nathan Schall

Contact details: 07411551137

Nathan@rts-recruitment.co.uk

R.T.S Recruitment’s DPO

Data Protection Officer: Darren Bryson

Contact details: 07952790725

d.bryson@rts-recruitment.co.uk

Reporting Safeguarding & Professional Conduct Concerns

All Clients, Internal Employees and Temporary Workers to report concerns to the appropriate individual / body.

Threshold	Who Do I Refer To?
Professional conduct concerns (Temporary Workers)	R.T.S Recruitment Ltd DSL (see above contact details)
Concerns or allegations that do not meet the harm threshold – referred to as ‘low-level concerns’ (Temporary Workers)	R.T.S Recruitment Ltd DSL (see above contact details)
Concerns or allegations that may meet the harm threshold (Temporary Workers)	Local Authority’s Designated Officer (LADO), including R.T.S Recruitment Ltd DSL in referral (see above contact details)
Concerns about a Child or Adult at Risk	Local Social Care
Immediate risk of harm to Child or Adult at Risk	Local police by dialling 999 (emergency only)

6.RESPONSIBILITIES

R.T.S Recruitment recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents, those with parental responsibility or carers has a role to play in safeguarding children.

All staff who work directly with children must read Part One and Annex B of KCSIE 2021. Staff who do not work directly with children can read the summary of Part One, where this is considered to be appropriate.

All staff must:

- Provide a safe environment in which children can learn.
- Be able and prepared to identify any child in need of early help.
- Be able to reassure victims that they are being taken seriously, and will be supported and kept safe. Staff should never give the impression that reporting abuse causes problems, and victims should not feel ashamed.
- Be aware of the role of the DSL, including how and when to contact them.
- Follow R.T.S. Recruitment's reporting structures for safeguarding concerns which reflect those outlined in KCSIE 2021.
- Be able and prepared to deal with any safeguarding concern including knowing who to speak to and understand how to deal with sharing information and confidentiality issues.
- Be aware of, and act on, the contents of (a) this Child Protection Policy which covers all peer-on-peer abuse; (b) the Behaviour Policy (which includes measures to prevent bullying, including cyberbullying, prejudice, and discriminatory bullying); (c) R.T.S. Recruitment's Online Safety Policy. In addition, staff must be aware of and understand their Code of Conduct/Staff Behaviour Policy.
- Receive appropriate training about safeguarding and child protection (including online safety), which is updated via email or bulletins at least annually or as required.
- Understand the child protection process, including Section 17 and Section 47 of the Children's Act 1989 and multi-agency meetings, and be aware of local arrangements for the early help process (sometimes referred to as the common assessment framework), understanding their role in each.
- Be aware of what to do if a child tells them about being abused, neglected, or exploited.
- Be able to recognise physical abuse, emotional abuse, sexual abuse, and neglect, as well as safeguarding issues surrounding child sexual exploitation (CSE), child criminal exploitation (CCE) including county lines, peer-on-peer abuse, serious violence, Prevent-related issues, and female genital mutilation (FGM) - AND understand that often safeguarding issues overlap.
- Be aware that safeguarding concerns can be linked to or caused by factors in a child's wider environment outside of the family, such as sexual and criminal exploitation, and serious youth violence. This is often referred to as contextual safeguarding.
- Be aware that mental health issues can be a significant indicator of abuse or neglect.
- Be able to report concerns about safeguarding arrangements within their school and know not to hesitate before doing so.

- Know what to do if a child is missing from education.

Further information to support staff to fulfil these responsibilities is contained throughout this policy and is covered in R.T.S. Recruitments safeguarding and related training programme.

7.CHILD PROTECTION AND SAFEGUARDING PROCEDURES

Where there is a child protection or safeguarding concern about a student

All staff at R.T.S Recruitment will follow the necessary child protection procedures if an incident occurs.

If a DSL or deputy is not immediately available

- Where a child is in immediate danger or at risk of significant harm, and the DSL or senior leader is not available, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral to the police in an emergency, or to children's services if there is a child protection or safeguarding concern.
- Where staff have a concern about a student that does not raise an issue of either immediate harm or a risk of significant harm, the staff member should not delay but, in the first instance, speak to a member of the SLT or contact the Local Authority children's services to determine the most appropriate way to proceed.
- Staff **should not assume** that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.
- Teaching staff and other designated professionals are responsible for reporting concerns relating to **FEMALE GENITAL MUTILATION (FGM)** and reporting is mandatory where either the individual:
 - Is informed by a girl under 18 that an act of FGM has been carried out on her; or they
 - 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.

They can also discuss the concern with the DSL, who will offer support and help.

Where the DSL is available and a member of staff suspects that any student may have been subject to abuse, neglect, or exploitation - or a student has suggested that abuse has taken place - the Designated Safeguarding Lead (DSL), or the Deputy DSL if the DSL is off site, must be informed immediately.

- In the case of a violent sexual assault or sexual harassment, staff are to follow the latest procedures as set out in Part 5 of [Keeping Children Safe in Education 2021](#).

- Staff must record the allegation and report it to the DSL immediately, but not investigate it themselves.
- The DSL will contact the Local Authority children’s social care team and follow its advice, as well as the advice of the police, if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made, and any others affected) with a named person they can talk to if needed. Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- The DSL can, where appropriate, contact the children and adolescent mental health services (CAMHS).

Where a student’s behaviour causes significant harm to other students, staff should follow the child protection procedures for the school. The DSL will refer the child in line with the local area safeguarding protocol for these children.

Where the issue involves ‘sharing nude or semi nudes’ (also known as sexting) by using online communications, text, or image messaging, please refer to the online safety policy. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/safety-centre/>. Other guidance is available: <https://www.gov.uk/government/publications/sharingnudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Where there is an issue relating to radicalisation or extremism

- The DSL will be the first point of contact for any issues of concern in relation to extremism.
- If the DSL is not available, staff should speak with a member of the SLT or children’s social care. If it is an emergency situation, the member of staff should call 999 or the confidential anti-terror hotline: 0800 789321.
- There is also a dedicated phone line at the Department of Education which offers help and guidance to staff and governors: call 0207 340 7264 or email counter.extremism@education.gov.uk.
- The DSL will assess the level of risk and decide which agency to make a referral to. This could include [Channel](#) - the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism - or the local authority children’s social care team

Where a student is identified as being at risk of exploitation, radicalisation, FGM, peer on-peer sexual abuse, or becoming involved in serious violent crime

In some cases, the DSL may decide to notify the Multi-Agency Safeguarding Hub (MASH) so that a strategic overview can be maintained and any themes or common factors can be recognised. The school will set timelines, monitor and review the situation, and take appropriate steps or seek advice as required.

Where an allegation of abuse is made against a member of staff (including supply teachers and volunteers) in relation to a student, it must be brought to the attention of the headteacher immediately. In line with KCSIE 2021, the school has two levels of allegation management. The first is allegations which meet the threshold, and the second is in relation to low-level concerns.

Where the allegation meets the threshold, R.T.S Recruitment will conduct basic enquiries to ascertain whether there is any foundation to the allegation, and will liaise with the LADO and other authorities as appropriate. The case manager will follow the procedure detailed at [Part 4 of KCSIE 2021](#).

In the event the headteacher is the subject of the allegation, the DSL will report to the Chair of Governors immediately, and the Chair will assume the role of “case manager”.

The threshold may be met in the following circumstances:

- They have behaved in a way that has harmed a child or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- They have behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

This includes behaviour outside of school that might make the person unsuitable to work with children (known as a transferable risk).

In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children’s social care services. If this is the case, the headteacher will ensure that the appropriate action is taken.

Low-level concerns are those which do not meet the threshold for referral to a LADO or the police but, as part of an open culture to safeguarding, should be talked about. Everyone is encouraged to report low level concerns, even by way of a self-referral, so that inappropriate or concerning behaviours are dealt with early and professional boundaries are maintained.

A low level of concern would be where, for example, a member of staff behaved in a way that is inconsistent with the staff code of conduct, but it isn’t considered serious enough to refer to the LADO such as a staff member being over-friendly with children, using inappropriate language, favouring a child or picking on a child, making inappropriate social media posts, making fun of a child’s work, making fun of a child in front of other children, or accompanying a child home from an event alone (albeit with the parent’s consent).

Low-level concerns will be dealt with efficiently and appropriately in line with the staff code of conduct/behaviour policy and, where appropriate, any other relevant school policy - for example, the data protection policy.

In the event of a low-level concern being raised with the headteacher, they will:

- Collect evidence from witnesses and from the person concerned.
- Collate the information and advise what actions should be taken – this could range from a conversation with the person to a warning or formal disciplinary proceedings.
- Keep a record of the concerns.

All information will be held in confidence and securely, in line with data protection laws (the Data Protection Act 2018 and UK GDPR).

Records will be reviewed regularly to identify any patterns or systematic issues. Patterns of staff behaviour could result in a more serious concern that meets the threshold test or results in disciplinary action for an

individual. Records will be maintained in line with R.T.S Recruitment Ltd's Data Retention and Disposal Policy and Procedure.

Suitability of staff and safe recruitment practices

R.T.S Recruitment recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff (including supply teachers) and volunteers we supply are suitable to do so and therefore do not pose any kind of risk to students.

Appropriate members of R.T.S Team are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained in 'Safer Recruitment'.

8.COMPLAINTS AND WHISTLEBLOWING

Where a staff member at R.T.S Recruitment Ltd feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

For details of the steps staff can take please refer to the **R.T.S Recruitment whistleblowing policy**.

General guidance on whistleblowing can be found on the [government website](#).

The NSPCC's "What You Can Do to Report Abuse" dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school. Staff can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email help@nspcc.org.uk.

9. TRAINING

R.T.S Recruitment Ltd ensures all staff complete safeguarding and child protection training as part of their induction. This includes online safety and whistleblowing procedures and is designed to ensure all staff:

- Understand R.T.S. Recruitment's safeguarding systems and
- Their responsibilities, and
- Can identify signs of possible abuse or neglect or exploitation,
- Know how to act upon any concerns they have.

All training is integrated, aligned, and considered as part of the whole-school safeguarding approach, including training on the issues and expectations in relation to allegations of peer-on-peer abuse. Training is considered as part of wider staff training and curriculum planning.

All training is in line with expectations and arrangements from our local safeguarding partners. It is also designed to support teachers to fulfil expectations through the Teachers' Standards in respect to managing behaviour in the classroom and having a clear understanding of pupil needs.

R.T.S. Recruitment also has a commitment to updating safeguarding training (including online safety) for all staff annually, and more regularly as required, through e-bulletins, CPD, or using the knowledge base of local partners or staff members (e.g. the Senior Mental Health Lead or members of our pastoral team).

To achieve this:

- Time will be given to enable this commitment to be met.
- All staff, governors, and volunteers (where appropriate) who are new to R.T.S. Recruitment will be given appropriate safeguarding training as part of their induction programme to R.T.S. Recruitment.
- Updates will feature regularly in all staff and SLT meetings, as appropriate.
- All school staff and Governing Body members will undertake the training.
- Newly recruited staff will complete training as part of their induction and will receive school-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend Prevent training and this will be cascaded to all staff.
- Contractors will receive safeguarding training where required or when otherwise considered necessary.

10. PREVENT DUTY – SAFEGUARDING STUDENTS WHO ARE VULNERABLE TO EXTREMISM

R.T.S Recruitment Ltd follows the statutory guidance on R.T.S. Recruitment's responsibility to fulfil our Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism.

It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, R.T.S. Recruitment takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with both the fundamental British Values and R.T.S. Recruitment Values, the following key principles underpin the community in which R.T.S. Recruitment is based:

- Inclusion.
- Tolerance.
- Freedom of speech.
- The expression of beliefs and ideology.

Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires school to have clear protocols for ensuring that any visiting speakers are suitable, appropriately supervised, and undergo the same checks as other visitors.

R.T.S. Recruitment is committed to training all staff in connection with the issues arising from our Prevent Duty. We are also committed to working with the Local Authority and other local partners to assess the potential risk of individuals being drawn into terrorism, because families and communities play a key role in ensuring young people and our communities are safe from the threat of terrorism.

The DSL will keep up-to-date with local threats, policies, and procedures relating to Prevent.

Reducing risks of extremism

The Designated Safeguarding Lead will work with partners and the Local Authority's risk assessment to determine the potential risk of individuals being drawn into terrorism.

Actions will include:

- Promoting spiritual, moral, social, and cultural development for students - this includes ensuring that the curriculum promotes fundamental British values.

- Creating an atmosphere of openness and safety so that students feel free and able to discuss sensitive topics, including terrorism and extremism.
- Ensuring students are protected from accessing extremist content online whilst in school – appropriate filters are be used.

R.T.S. Recruitment recognises that the Prevent duty does not ask teachers to carry out unnecessary intrusions into family life, but, as with any other safeguarding risk, they must take action when they observe behaviour of concern.

Potential signs of radicalisation and extremism

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all school staff will be vigilant to changes in students' behaviour which could indicate that they may be in need of help or protection.

It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs, or seek to hide their views. Staff are advised to use their professional judgement in identifying students who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

There is no limit to the signs that you might notice – every student is different. However, some of the indicators staff should look out for include:

- Becoming increasingly argumentative.
- Refusing to listen to different points of view.
- Being unwilling to engage with children who are different.
- Becoming abusive to children who are different.
- Embracing conspiracy theories.
- Feeling persecuted.
- Changing friends and appearance.
- Distancing themselves from old friends.
- No longer doing things they used to enjoy.
- Converting to a new religion.
- Being secretive and reluctant to discuss their whereabouts.
- Being sympathetic to extremist ideologies and groups.
- Online, changing their identity, having more than one online identity, spending a lot of time online or on the phone, accessing extremist online content, and joining or trying to join an extremist organisation.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationships, or drug/alcohol issues.

11.ABUSE AND NEGLECT

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. In many cases, multiple issues of abuse will overlap.

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

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate.

It may also feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse:** forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:
 - **Physical contact**, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
 - **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.Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women, or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) and set out separately in this policy.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy - for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment), or protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

12.SPECIFIC SAFEGUARDING CONCERNS

All staff at R.T.S Recruitment Ltd are aware of safeguarding issues that can put children at increased risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sharing nudes or semi-nudes (also known as sexting or youth-produced sexual imagery) can put children at an increased risk of danger.

Warning signs of exploitation

One of the main signs of abuse or exploitation is when a child goes missing from education, particularly repeatedly. This can be a vital warning sign of a range of safeguarding concerns, but in particular, exploitation - including criminal exploitation and county lines and/or sexual exploitation.

Child exploitation

All staff should be aware that child criminal exploitation (CCE) – including county lines and child sexual exploitation (CSE) can involve both boys and girls - though boys and girls can be exploited using different methods and may present differently. As with other types of abuse, there is an increasing risk of exploitation taking place or beginning through threats posed online. Staff should also be aware:

- That children who have been exploited in this way are victims themselves – and that this is sometimes not recognised by professionals.
- That CCE can lead to CSE for both boys and girls
- Children can be moved from place to place in order to exploit them (trafficked).
- Children who have been involved in this type of abuse may need extra support to stay in education.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Children can be moved from area to area – this is known as trafficking. Involvement in this type of abuse can be as a direct result of threats of serious violence to the young person or their family.

The victim can be exploited even when the activity appears to be consensual. Further, it does not always involve physical contact but can happen exclusively online.

Examples of CCE include: young people may be forced to work in cannabis factories, coerced into moving drugs, money, or weapons including across the country (county lines), forced to shoplift, pickpocket, or steal vehicles, or forced into violent crime or making threats to other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.

- Regularly missing school or education.
- Not taking part in education.
- Being involved in serious violence, carrying weapons, or vehicle crime.

Indicators for children who might be being exploited through county lines activity specifically are those who:

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, and handing over and collecting money for drugs.
- Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a ‘trap house’ or somewhere that is being ‘cuckooed’, or a hotel room where there is drug activity.
- Owe a ‘debt bond’ to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

Serious violent crime

Some students may be drawn into serious violent crime. Staff need to be aware of the indicators that this may be happening to a student. These may include:

- Increased absence from school.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as:

- Being male.
- Having been frequently absent or permanently excluded from school.

- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff who are concerned about any of these issues should, as with any other concern, speak to the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate. It may be that, if the concern is raised at an early stage, the student can be supported through the Early Help process. Further information and guidance has been produced by the government and can be found [here](#).

Child sexual exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when 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:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator, and/or
- by threats of serious violence to the victims and their family.

It can be a one-off or part of a series of acts over time, and can be opportunistic or organised abuse. It can be perpetrated by men or women, and peers can be involved. Victims of this type of abuse can be male or female. The victim may be subject to criminal exploitation and may be trafficked for the purpose of exploitation.

The victim may have been sexually exploited even if the activity appears consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge - for example, through others making copies of recordings or images.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate or risky sexual or sexualised behaviour.
- Repeated sexually transmitted infections.
- In girls, repeated pregnancy, abortions, and miscarriage.
- Receiving unexplained or unaffordable gifts or gifts from unknown sources.
- Going to hotels or other unusual locations to meet friends.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.

- Having older boyfriends or girlfriends, or hanging out with groups of older people.
- Being involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in appearance, behaviour, or personality (chaotic, aggressive, sexual, etc.).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Being involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

Honour-based abuse: Forced Marriage (FM)

This is an entirely separate issue from an arranged marriage. Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic abuse. It is also a criminal offence to force a person to marry in England and Wales.

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle-East and African countries. However, it can affect boys and children with SEND

A signal of FM is the removal of the child from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings. Any member of staff at R.T.S Recruitment Ltd with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a school or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

Honour-based abuse: Female Genital Mutilation (FGM)

There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at R.T.S Recruitment Ltd will recognise this responsibility.

The ‘One Chance’ rule.

As with Forced Marriage, there is the ‘One Chance’ rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the school takes action without delay.

What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Why is it carried out?

It is often based on a belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage.
- Is part of being a woman/rite of passage.
- Upholds family honour.
- Fulfils a religious requirement.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Makes childbirth easier – this is a mistaken belief.

FGM is a criminal offence.

All staff at R.T.S Recruitment Ltd will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

All teachers have a mandatory responsibility to report FGM if they discover, in the course of their professional duties what appears to be FGM to the police. The DSL, who will offer support, should also be informed immediately. Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.

- Reluctance to take part in physical activity.
- Repeated urinal tract infections.
- Disclosure of abuse.

Further guidance and information are available from: **NSPCC FGM Helpline**
 Contact days and times: **24 hours** Tel: **0800 028 3550** Email: **fgmhelp@nspcc.org.uk**

Peer-on-peer abuse

All staff at [R.T.S Recruitment ltd must be aware that children can abuse other children (referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudiced-based, and discriminatory bullying.
- Physical abuse, such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment and online sexual harassment, such as that which takes place on social media or chat rooms, which may be stand- alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.
- Initiation/hazing type violence and rituals. This could include activities involving harassment, abuse, or humiliation, used as a way of initiating a person into a group. It may also include an online element.

Identifying peer-on-peer abuse & understanding consent

Every student will react differently, but some recognised indicators of peer-on-peer abuse are:

- Bleeding, bruising, sexually transmitted infections (STIs), or pregnancy.
- Becoming withdrawn or displaying other behaviour changes.
- Being fearful of being in school or online.
- Missing education.
- Self-harming.
- Displaying behaviours beyond their stage of development.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a

condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

Most issues of peer-on-peer abuse can be dealt with through the school's behaviour policy, but where the behaviour raises a safeguarding concern, it falls within the scope of this child protection and safeguarding children policy. Procedures for dealing with these sorts of concerns, including violent sexual assault by peers, is set out in Section 11 of this policy. R.T.S. Recruitment recognises that it is important to educate students to understand:

- What constitutes appropriate behaviour – including online.
- Issues around consent.
- Issues around discrimination and misogamy.
- Where the criminal law fits into this type of behaviour.

R.T.S. Recruitment recognises that peer-on-peer abuse is a problem and is happening, even when the issues are not reported. This sort of abuse has a serious impact on those who are victims, in terms of self esteem and relationships but also educational outcomes.

Consequently, R.T.S Recruitment ltd has put in place procedures and expectations based on the following:

- This type of abuse takes place in school, outside of school, and online. It can affect any age of child but is predominantly an issue for secondary and college age groups.
- Staff must maintain an attitude of "it could happen here".
- Downplaying inappropriate behaviour can lead to a culture of unacceptable behaviour and can lead ultimately to normalisation of abuse. It will not be tolerated – we have a zero-tolerance approach to this issue.
- Staff must intervene in "inappropriate" behaviour, which can prevent it from escalating to abusive or violent behaviour.
- It is crucial to have a zero-tolerance approach to sexual violence and sexual harassment, and an important part in this is not tolerating or laughing off sexual banter or jokes.
- Victims of this type of abuse are likely to be distressed and there is a likelihood of it affecting their educational attainment – this is more likely where the alleged perpetrators attend the same school or college.
- Girls are more likely to be victims and boys are more likely perpetrators – however, any report or suspicion should be taken seriously.
- The abuse can be perpetrated by an individual or a group.
- Sexual violence can happen in intimate relationships between peers.
- There can be links between this type of abuse and sexual and criminal exploitation.

- Some children may face additional barriers in reporting because of vulnerabilities, disabilities, sex, ethnicity, and sexual orientation.
- Procedures that we put in place to deal with issues of sexual violence or harassment must be clear, easily accessible, and well-promoted, so that children feel confident in reporting abuse.
- Staff must be aware of behaviour in children that might indicate there is an issue with sexual harassment or violence and act immediately.
- Responding to each incident well will build a trust in the systems so that victims will feel able to come forward in future.
- It is extremely important to listen and react to the child's report (listening well and not asking leading questions).
- Whilst victims' wishes and feelings are of paramount importance, a school should not forget to balance this with its duty to protect other children.
- Where a report is found to be malicious or unfounded, R.T.S. Recruitment should consider what the most appropriate step should be – it might be that the person has been abused by someone else or the allegation might be a cry for help. If the report was deliberately made up, R.T.S. Recruitment will consider using disciplinary processes.
- All staff should understand the consequences of sexual violence and be aware of all of the available resources for victims but also for perpetrators – many of which are linked at the end of the section.
- It is important to look for patterns in all reports and identify any broader issues that need to be addressed.

All staff have been asked to read the guidance on sexual violence and sexual harassment between children [here](#), which contains detailed information on a range of relevant topics (e.g. definitions, contextual issues such as power and coercion, and advice on a whole-school approach).

Sharing nude/semi-nude images (sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the sharing of nude or semi-nude images (also known as sexting and 'youth-produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download, or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

- Share information about the incident with other members of staff, the pupil(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any student involved.

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL. Further information can be found here: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

13.CONFIDENTIALITY AND RECORD KEEPING

Staff at R.T.S Recruitment ltd have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all safeguarding and related incidents and child protection concerns relating to individual students. If a teacher or any other staff have a child protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be kept on the student's child protection file.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

Where R.T.S. Recruitment contracts with others to run activities in the school premises or grounds, appropriate safeguarding arrangements/expectations will form part of the contract.

14.SUMMARY

We Believe That:

- Children and young people should never experience abuse of any kind.
- We have a responsibility to promote the welfare of all children and young people, to keep them safe, and to practice in a way that protects them.

We Recognize That:

- The welfare of children is paramount in all the work we do and in all the decisions we take.
- Working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, or other issues.

- Extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

We Will Seek to Keep Children and Young People Safe By:

- Valuing, listening to, and respecting them.
- Appointing a nominated child protection lead for children and young people, a deputy, and a lead trustee/board member for safeguarding.
- Adopting child protection and safeguarding best practices through our policies, procedures, and code of conduct for staff and volunteers.
- Developing and implementing an effective online safety policy and related procedures.
- Providing effective management for staff and volunteers through supervision, support, training, and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures, and behavior codes confidently and competently.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
- Recording, storing, and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner’s Office: ico.org.uk/for-organisations].
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work, and one-to-one discussions.
- Making sure that children, young people, and their families know where to go for help if they have a concern.
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our children, young people, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

Building a safeguarding culture where staff and volunteers, children, young people, and their families treat each other with respect and are comfortable sharing concerns.

15. MONITORING AND REVIEW OF THIS POLICY

The Designated Safeguarding Lead (DSL) at R.T.S Recruitment will monitor the working of this policy and will report as required to the headteacher and the nominated governor. It will be reviewed as required and annually.

