



## Safeguarding of Children and Adults at Risk - Policy

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This policy reflects legislation and official guidance at the time it was last reviewed. Any changes in legislation will take precedence over anything printed in this policy. Where other policies are referred to, they can be viewed at the Policy Library

## 1. Context

The RSN has a responsibility to take reasonable care of children and adults at risk and will take reasonable steps in relation to their safety and welfare. This duty is both a legislative requirement and within our own operations.

The RSN encounters children and adults at risk in various settings, including but not limited to, teaching activities, organised tours, outreach programmes, online tutorials and seminars and at exhibitions. The RSN has a duty, both in law and care, and as a responsible organisation whether on our premises or remotely.

The term safeguarding is used to define actions taken to protect vulnerable groups from harm. This harm might come from adults or other children and RSN employees and contractors are responsible for identify any instances and taking appropriate action

The following legislation and policies are relevant to this policy, either because it has influenced its introduction and/or its content:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Children's Act 1989
- The Police Act 1997
- Protection of Children Act 1999
- Management of Health and Safety at Work Regulations 1999
- The Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- The Counter-Terrorism and Security Act 2015
- General Data Protection Regulation 2018
- Whistleblowing policy
- Complaints Policy

The Protection of Freedoms Act 2012 is of particular importance to this policy document as all decisions made to bar individuals from working with children or adults are made by the Disclosure and Barring Service (DBS) via this legislation.

As a Higher Education Institution, whilst there is no statutory requirement to adhere to the Department for Education's "[Keeping children safe in education](#)" guidance due regard has been given to its contents for best practice purposes.<sup>1</sup>

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<sup>1</sup> The Royal School of Needlework does not meet the statutory definition of a 'school' or a 'college' as defined within the Education Act 2002, or associated legislation

## 2. Policy

Our policy on preventing and reducing harm to children and adults at risk is explained through this document.

The RSN is committed to safeguarding the welfare of all members of its community, students and staff. It is also mindful of the particular safeguarding duties owed to specific vulnerable groups. In all its activities the RSN aspires to promote the safety and wellbeing of all members of its community.

This document states the RSN's policy on preventing and reducing harm to children and adults at risk when they are in contact with RSN staff, workers, contractors, volunteers, apprentices or students.

The policy aims to:

- Promote and prioritise the safety and wellbeing of children and adults at risk;
- Raise awareness that everyone who comes into contact with children/adults at risk (and their families) has a role to play. In order to fulfil this responsibility effectively, all should make sure their approach is centred around the vulnerable individual. This means that they should consider, at all times, what is in the best interests of the child and/or the adult at risk.
- Provide assurance to parents, carers and other parties that the RSN takes reasonable steps to manage risks and keep children and adults at risk safe;
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters;
- Put in place proportionate safeguards to prevent the employment of individuals who pose a risk in working with children and/or adults at risk.
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with RSN staff, students, apprentices or volunteers, whether the harm has taken place on RSN premises or not.
- Ensure all staff are able to reassure victims of abuse that they are being taken seriously and will be supported.

The Children and Adults at Risk Safeguarding Policy also seeks to manage effectively the risks associated with activities and events involving children and adults at risk through departments/institutions:

- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these;
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis;
- Ensuring that the appropriate DBS checks, or other appropriate screening checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children or adults at risk;

- ensuring new employees and individuals involved in working with children or adults at risk to familiarise themselves with the content of this policy and the associated Code of Practice.
- Ensuring appropriate whistleblowing procedures are in place for such safeguarding concerns to be raised with the RSN's senior leadership team.

This policy requires that any suspicions and allegations involving harm to children and/or adults at risk are referred to the designated safeguarding lead, or their deputy, to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and sensitively.

Appropriate steps are taken as a result of any investigations, which may include contacting the police, social services and/or fulfilling the legal duty to refer information to the DBS as required.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and adults at risk from abuse and the need to protect staff, students, apprentices and volunteers from false or unfounded accusations. Any individual who raises a child protection concern will not be subject to any adverse or detrimental treatment.

The Children and Adults at Risk Safeguarding Policy should be used as the basis of the approach to preventing and reducing harm to children and adults at risk. However, departments/institutions are permitted to develop their own procedures, in line with the overarching policy, to address any safeguarding matters of particular relevance to them.

### **3. Policy Scope**

RSN employees, workers, contractors, volunteers, apprentices and students are subject to this policy.

For the purposes of this policy, a child is defined as any person under the age of 18.

Under the Care Act 2014, an Adult at Risk is a person aged 18 years or over, who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

The policy covers:

- Recruitment to a new or existing post which involves working directly with children and/or adults at risk;
- The commencement of new activities or events involving or potentially involving children and/or adults at risk; and
- Changes being made to activities or events involving or potentially involving children and/or adults at risk.

It is expected that external bodies utilising the RSN's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities. In addition, whilst on our premises, external bodies are also expected to have due regard to this policy.

#### **4. Procedure**

It is not always easy to recognise a situation where abuse may occur or has taken place and employees of the RSN are not expected to be experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or adult at risk. It is important that the recipient of any complaint or accusation that a child or adult at risk has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

The RSN designated safeguarding lead is the Director of Education of the RSN. The Director of Staff and Customer Engagement, in their HR Management role, is the nominated designated safeguarding deputy.

The CEO can delegate responsibilities as required to trained and DBS checked deputies, however the overall responsibility remains with the designated lead.

The designated safeguarding lead and deputy should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

The designated safeguarding lead, and/or their deputy, is responsible for:

- Promoting the Children and Adult at Risk Safeguarding Policy, both within HR and to departments/institutions.
- Dealing with any reported suspicions and allegations of abuse of children or adults at risk within the RSN.
- Providing appropriate information when making referrals to external agencies (such as Social Services, the DBS or the Police) in all cases of suspected abuse of children or adults at risk.
- Ensuring that appropriate records are kept in relation to the reporting of any safeguarding incidents.
- Familiarising all staff with the Children and Adults at Risk Safeguarding Policy, including the Code of Practice, during their induction;
- Ensuring that relevant staff are familiar with the department/institution's proposed activities and follow the Children and Adult at Risk Safeguarding risk assessment process.

In the event of suspicions or allegations being raised in a non-emergency context, the Section Head is the first point of contact. The matter must be escalated to the Director of Staff and Customer Engagement at the earliest opportunity.

It is the responsibility of the member of staff leading an activity or event which involves working with Children and Adults at Risk to:

- Identify that the Children and Adults at Risk Safeguarding Procedure is applicable to a particular role, activity or event.
- Assess potential new recruits using a range of different selection methods, probing the candidates' attitudes, values and motivations in relation to working with vulnerable groups.
- Ensure that staff, workers, apprentices, volunteers and students working with children and adults at risk are familiar with the contents of the policy and its application before any new or changed activity/event, including the Code of Practice.
- Complete and update the risk assessment.
- Ensure implementation and review of the actions identified by the risk assessment.
- Identify whether individuals recruited or involved in an activity or event require a DBS check or other appropriate screening check and, where applicable, ensure this is done in accordance with HR/Student Registry procedures.

## 5. Schedule

Staff of the RSN, workers, contractors or students may encounter children and adults at risk in a wide range of situations. For example:

- Teaching, training or instructing children, whether supervised or unsupervised
- Certain first degrees on age of entry.
- Research work, which involves direct physical contact with children and/or vulnerable adults.
- Work experience students under 18.
- Widening participation outreach activities with schools, colleges or community groups.
- Photography of children for publication.
- First aid delivery.
- Open days.
- Working with disabled students
- Working with community groups containing vulnerable adults
- Programs or summer schools.

Sections must ensure that all new members of staff, workers, contractors and apprentices are made aware of this policy and that they are given time to read it during their induction period.

Any person who will have direct contact with a child or adult at risk as part of their day-to-day employment, or event/activity, would be expected to undertake appropriate training. Any decision to undertake such training should be made on a proportionate basis.

## **6. Risk Assessment**

The Children and Adult at Risk Assessment process will be initiated by the following circumstances.

- Recruitment to a new or existing post which involves working with children and/or adults at risk;
- The commencement of new activities or events involving or potentially involving children and or adults at risk;
- Changes being made to activities or events involving or potentially involving children and or adults at risk.

Once it has been identified that the risk assessment process should be initiated, it is vital that the person to complete the assessment in advance of the relevant recruitment campaign, activity or event by a competent person. Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

The risk assessment should:

- Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised;
- Consider if there will be children and adults at risk present;
- Consider whether any children or adult at risk have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties;
- Identify any potential areas for harm;
- Evaluate the risks;
- Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented;
- Identify those situations that would require a DBS check

Completed risk assessments should be returned to the Director of Operations prior to the activity and retained by departments/institutions whilst an activity/event is ongoing and for five years after it has ceased (or the risk assessment has been superseded). Where an activity is ongoing but unchanged, institutions should review the risk assessment on an annual basis to ensure that the measures put in place are still relevant and appropriate.

## **7. Concerns**

Concerns for the safety and wellbeing of children and adults at risk could arise in a variety of ways and in a range of situations. For example, a child/ adult at risk may

report or show signs of abuse, someone may hint that a child/adult at risk is or has been subject to harm, or that a colleague is an abuser, or someone may witness abuse.

Where an individual suspects or is informed that a child or adult at risk has been, is being, or could be harmed as a result of taking place in a RSN activity/event or through contact with RSN staff, workers, contractors, volunteers, apprentices, or students, it is not the responsibility of that person to decide whether abuse has taken place.

Instead, the individual aware of these suspicions or allegations must take the following steps:

1. **In emergency circumstances** (i.e. where there is certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed), **referrals must be made to the Police, social services or other appropriate authorities.** This should always be prior to consulting with the CEO or Director of Operations.
2. Where the situation is **not an emergency**, referrals should be channeled as follows:
  - i. The Section Head
  - ii. The CEO, or Director of Operations

Where a complaint of abuse is reported, the designated safeguarding lead, or their deputy, will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant head of institution and take further action through the relevant internal procedures. This may include invoking the RSN's Disciplinary Procedures.

#### **4. Dealing with concerns**

For all allegations raised, the following information must be recorded and retained in a confidential manner:

- a clear and comprehensive summary of the allegation, including who made it and who it was against.
- details of how the allegation was followed up and resolved.
- a note of any action taken, decisions reached and the outcome as categorised



above.

- a copy provided to the person concerned, where agreed by children's social care or the police (if applicable), and,
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference.

The RSN has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

The RSN must not knowingly allow a barred person to work in 'Regulated Activity' (see 'Identifying required checks', below).

## **5. Enquiries**

Any enquiries made by the media about possible allegations of abuse regarding children/adults at risk should be referred to the CEO immediately.

It is impossible to promise complete confidentiality when a concern is raised or an accusation made. This is because the RSN must take reasonable steps to ensure the safety of children and adults at risk on its premises.

The RSN also owes a duty of care to its staff, students and visitors. In cases of potential or actual harm of an individual, information provided in confidence must be weighed against this duty of care and in all cases involving children, the best interests of the child are paramount. However, as part of this policy, only people who need to be informed about an incident or concern, whether internal or external to the RSN, should be informed.

## **6. Types of Abuse**

The categories of abuse below are produced from external guidelines. A person may abuse or neglect a child/adult at risk by inflicting harm, or by failing to act to prevent harm. All staff should also understand the importance of challenging inappropriate behaviour between children and young people (peer on peer abuse), as defined below.

There are five main forms of abuse, although there are variations within these. Where reference is made to a child, such reference is also applicable to an adult at risk in all

cases.

- **Abuse:** 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.
- **Physical abuse:** a form of 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 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 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:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration, or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, nude, semi-nude or sexual images or videos, 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 is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **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); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.