

Safeguarding Policy & Procedures

January 2022

Review schedule

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By January 2025 Next review date

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1 INTRODUCTION

This policy sets out the measures developed by the Royal Welsh College of Music and Drama ('the College') to ensure the comprehensive safeguarding of children and adults at risk across all our activities.

All our staff members have an essential part to play in ensuring that this policy is implemented in a way that is robust and sustainable. It is, therefore, a requirement that all staff and directors familiarise themselves with the policy and its component parts.

The broad aim of the safeguarding strategy is to

- provide a safe and supportive learning environment for children and adults at risk, where they can develop their potential to the full
- create a strong safeguarding culture within our organisation, so that parents/carers can be assured of the care their children receive
- ensure that our staff feel adequately informed and supported to take a confident, proactive part in sustaining the safeguarding culture within the organisation.

This document

- specifically sets out our responsibilities in those situations where there are concerns about the safety and welfare of a child or adult at risk
- seeks to offer guidance and procedural advice more widely to students and parents/carers, as well as to staff
- recognises and incorporates the principles set out in the UN Convention on the Rights of the Child and accords with guidance from the Welsh Government and the 'Wales Safeguarding Procedures ('WSP')
- takes account of relevant legislation and other guidance relating to safeguarding and protecting children, including the Children Act. (Child protection legislation in Wales, as well as the three other UK nations, is summarised online at <https://learning.nspcc.org.uk/child-protection-system>.)
- also relates to adults who might be particularly at risk of abuse, neglect, or exploitation.

The requirement to abide by these safeguarding measures form part of our staff's contractual obligations.

Becoming aware of, or recognising that a child, or adult at risk, may be suffering abuse or neglect, or having a concern about the behaviour of an individual towards others can cause anxiety.

This anxiety can sometimes inhibit us from taking appropriate protective action, or we can be left wondering what we could or should do.

This document sets out clear procedures that must be followed in any situation where you are concerned about the safety or welfare of a student or other individual.

2 DEFINITIONS

Child: Under the UN Convention on the Rights of the Child, a 'child' is deemed to be any person under the age of 18 years.

Adult At Risk: The [Social Services and Well-being \(Wales\) Act 2014](#) defines an adult at risk as an adult who:

- is experiencing or is at risk of abuse or neglect
- has needs for care and support (whether or not the authority is meeting any of those needs), and
- because of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

It is important to note that:

- the use of the term 'at risk' means that actual abuse or neglect does not need to occur before practitioners intervene; rather, early interventions to protect an adult at risk should be considered to prevent actual abuse and neglect
- the three conditions necessary to demonstrate an adult is at risk of abuse or neglect ensures that protection is provided to those with care and support needs whom also require action to secure the individual's future safety
- that the abuse of adults deemed to be 'at risk' is often linked to their circumstances rather than the characteristics of the people experiencing harm
- risk of abuse or neglect may be the consequence of one concern or a result of cumulative factors.

3 SCOPE AND REMIT

All children and adults should be treated without distinction in respect of age, gender, nationality or ethnic status, family status, religion, ability or disability, appearance, sexuality or developing sexuality.

All children and adults should be treated with dignity and respect.

While of particular relevance to the College's Junior Conservatoire, Young Actors Studio, Young People's Production Arts programme, Outreach, Summer Schools and Community Lessons activity, this document encompasses all College activities, including degree and diploma courses.

Where the children of students, staff members or visitors are present on the College campus, they remain the responsibility of their parent/carer, or those acting 'in loco parentis' (eg teachers), unless they are enrolled as College students, or are otherwise involved in a college-managed activity. However, whatever the status of the child, any concerns about their safety or welfare should be reported in accordance with these procedures.

Disabled children and children with additional learning needs may be at greater risk of all forms of abuse than non-disabled children. We therefore need to be especially aware of their needs and all concerns about their safety or welfare should be reported in accordance with these procedures.

Our presumption is that adults have mental capacity to make informed choices about their own safety and how they live their lives and we will take account of an adult's ability to make such informed choices. However, that does not preclude us from seeking guidance or making a report to statutory agencies where necessary and all concerns about the welfare or safety of an adult who may be at risk should in the first instance be reported to the Designated Person.

Although these procedures are mandatory for members of staff, this is a public document and therefore any parent, carer or other member of the public who becomes concerned about a child's safety or welfare, or that of an adult at risk, should pass on their concerns and follow these procedures.

Cases of Historic Abuse: Individuals who wish to disclose incidents of non-recent abuse are encouraged to follow the reporting procedures outlined in this policy.

4 DESIGNATED PERSONS

4.1 Lead Safeguarding Officer and Designated Persons

The Lead Safeguarding Officer for RWCMD has overall responsibility for all safeguarding activity within the College. The Lead Safeguarding Officer will be consulted in situations that cannot be adequately resolved at the Designated Person level, or where concerns relate to the Designated Person.

The Designated People for Safeguarding are the first point of contact for any concerns about the safety or welfare of a child or adult at risk. The role of a Designated Person is set out in detail below (see 4.2 below).

The Lead Safeguarding Officer is:

Brian Weir, Director of Academic Administration and Student Experience **brian.weir@rwcmd.ac.uk**

The Designated People are:

Kate Williams, Student Support Manager - **kate.williams@rwcmd.ac.uk**

Patricia Keir, Head of the Junior Conservatoire - **patricia.keir@rwcmd.ac.uk**

Michael Waters, Head of the Young Actors Studio (YAS) - **michael.waters@rwcmd.ac.uk**

The above people form the College's Safeguarding Group. The RWCMD Board member with responsibility for safeguarding is Mario Ferelli.

If the Designated Person for your activity is not available, you should contact another one, or the Lead Safeguarding Officer. (See section 8 below for further details on reporting concerns.)

4.2 The role of the designated people for safeguarding

The Designated People for Safeguarding are there to help and support you, as well as ensuring that any necessary correct action is taken to safeguard a child or adult at risk.

The importance of their role is that it:

- gives confidence to those who may have worries that their concerns can be shared
- provides a clear and consistent route for action
- maintains the confidentiality of the child, family and/or individual
- allows thoughtful consideration on further action
- is protective and supportive of those who raise concerns
- ensures a professional response and offers security to the College
- safeguards children and adults at risk

The Designated People:

- receive information from staff, volunteers, other professionals, children, parents/carers or members of the public who may be worried about a child or adult at risk, or who may be worried about the behaviour of someone else towards a child, or adult at risk, including bullying behaviour
- make an initial record of that information
- assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate

- consult, if necessary, with the statutory authorities to test out any doubts or uncertainties about the concerns, as soon as possible
- where indicated, make a formal report to social services or the police without delay, and follow this up in writing within 24 hours
- liaise with social services or the police, if necessary, following a report
- ensure that all written records relating to concerns about a child or adult are completed, signed and dated, and kept securely until no longer needed
- keep the Lead Officer for Safeguarding (see above) informed of all action relating to allegations or information concerning unprofessional, or inappropriate behaviour by a member of staff or volunteer that may pose a risk of harm to a child or adult
- advise and support staff or volunteers in relation to child and adult protection concerns.

The designated people will also:

- be familiar with the statutory child protection system and the safeguarding adult's system and keep up to date with contact details
- be aware of the Wales Safeguarding Procedures and Protocols and the role of the Regional Safeguarding Children Boards (<https://www.safeguarding.wales/rsb/r1/r1.p1.html>)
- identify training needs relating to child and adult safeguarding and protection within the College and obtain suitable training courses. (Further information about the training procedure is set out in Appendix 5.)
- collate management information relating to safeguarding activity within the College and report on this to the Board of Directors
- together with the Lead Safeguarding Officer, ensure that the safeguarding policy and these procedures are reviewed at least every two years, or earlier, in response to internal or external requirements.

4.3 Procedures for designated people - receiving and reporting information

Your role as a designated person for safeguarding is summarised above.

The following sets out the detailed procedures you should follow if someone reports concerns about a child, or an adult who may be at risk, or the behaviour of an adult towards a child / adult at risk, or an allegation or concerns about a member of staff or other professional that might indicate harm, or potential harm, to a child, or adult at risk.

When you receive concerns or information about a child or adult at risk, or about inappropriate behaviour by an adult or other, you should

- listen carefully to ensure you understand what is being said
- ask questions to clarify your understanding, but remember it is not your role to investigate
- check that you have all the necessary factual information to allow you to identify the child and family or the adult when making a report
- reassure the person reporting the concern that they have done the right thing
- ensure a written record of the concerns and your conversation is made, including anything the child or adult may have said, using the child's or adult's own words as reported to you
- check the written account with the person reporting to you to ensure that it is accurate and that nothing significant is left out
- sign and date the written account and ask the person reporting to you to sign the record also

- assess the information you have received and check whether there is previous information available to you that has a bearing on the situation, e.g. recorded observations or concerns about a child's behaviour or presentation

If someone has been alleged to be the abuser, consider what contact the child or adult or other children may be having with this person and assess if any immediate safeguarding action needs to be taken.

If the concern is about a child

- decide whether you should inform a child's parent/s or carer about the concern, or that you are going to make a report to social services. This should not be done if the concern is about sexual abuse by a family member or person closely known to the family, or fabricated or induced illness, or if you believe that to do so would further endanger the child or adult at risk.
If you feel unsure about the significance of the information, and/or whether you should talk to the child's parent or carer, clarify this by either contacting the Cardiff Children's Access Point on 029 2053 6490 or <https://www.cardiff.gov.uk/ENG/resident/Social-Services-and-Wellbeing/Children/Protecting-children/Pages/default.aspx>
or contact the NSPCC's 24hr Helpline on 0808 800 5000 to discuss the information
- decide on further action and record the reason for your decision. Remember, taking no further action is a decision and may need to be taken following consultation as above. Any decision to 'monitor' the situation should state clearly what is to be monitored and for how long. 'Monitoring' should also be regularly recorded, as well as the final outcome of the monitoring
- maintain the privacy and confidentiality of the child and family by only sharing the information with those who 'need to know'
- where indicated, make a formal report following the guidelines below
- generally, reports should be made to Children's Services in the local authority where the child is resident

You should not

- dismiss concerns reported to you without carefully considering them and taking advice if necessary
- go and talk to the child yourself
- confront any alleged abuser
- delay in taking appropriate action.

If the concern is about an adult who may be at risk

Adults at risk have the right to be fully involved throughout the adult protection process and to make decisions about their safety and welfare, unless it has been assessed that they do not have the mental capacity to make any particular decision. It is not your role to determine if an adult has capacity or not (see Appendix 2). Similarly, it is not your role to decide if abuse or exploitation has taken place.

Therefore, you should carefully explain to the adult that

- concerns have been raised with you about their safety or welfare
- you take these concerns seriously
- re-assure them that they are not to blame
- ask for their consent for the information to be shared with other agencies on a 'need to know' basis
- say you will tell the appropriate person so that those with experience can support and help them
- explain to the adult that they will have feedback on what steps are taken
- if consent is not given, explain carefully that you have a duty to pass the information on to other professionals who know what to do

- reassure them that they have the right to be fully involved in all decisions
- check for any immediate or short-term safety requirements
- decide on further action and record the reason for your decision. Remember, taking no further action is a decision and may need to be taken following consultation as above. Any decision to 'monitor' the situation should state clearly what is to be monitored and for how long. 'Monitoring' should also be regularly recorded, as well as the final outcome of the monitoring
- maintain the privacy and confidentiality of the adult by only sharing the information with those who 'need to know'
- where indicated, make a formal report following the guidelines below.

You should not

- dismiss concerns reported to you without carefully considering them and taking advice if necessary
- confront any alleged abuser
- delay in taking appropriate action.

Concerns about staff or volunteers

If the concern involves a member of staff or volunteer, it is NOT THE ROLE OF THE COLLEGE to decide internally whether this is a disciplinary issue or a child or adult protection matter. These considerations should take place with the involvement of social services and the police.

The statutory agencies will advise on

- when or if suspension of a member of staff is warranted from their perspective
- what can be divulged to the member of staff regarding the allegation or concern
- any reason why a child's parent/carer should not be immediately informed, or those with caring responsibilities for an adult at risk
- whether a Strategy Meeting is to be convened.

You should decide if any emergency protective action needs to be taken to safeguard anyone at risk of immediate harm. Phone 999 in the normal way if necessary.

Telephone Cardiff Children's Access Point on 029 2053 6490 for concerns relating to a child.

Telephone the Adult Safeguarding Team on 029 2233 0888 for concerns relating to an adult at risk.

Alert the College's HR department regarding possible suspension or disciplinary action.

Alert the College's Lead Officer for Safeguarding.

All concerns or allegations about a member of staff will be dealt with in strict confidentiality.

If the concern or allegation is about a member of staff or volunteer from a group attending the College, or you have received information of a report made within a school, you should liaise with the organisation's Designated Person for Safeguarding to identify appropriate action, including timescales. A feedback mechanism should be agreed to inform you of the outcome of such action. If you remain concerned that the concern/allegation/report has not been taken seriously, or sufficient action has not been taken, then you should make your own report to the statutory authorities in the normal way.

4.4 Making a report

You should

- state clearly that you are reporting a child or adult protection matter
- write down the name and status of the person you speak to (eg, Paul Jones, Duty Social Worker)
- give a concise account of the information you have received, including how and when it was reported to you
- ensure that you provide the necessary factual information to identify the child and family, or adult at risk, and any alleged abuser
- include information about any language/communication or other difficulties the child or adult at risk may have, and give a brief description of the child/adult at risk, if you can, to assist the person making contact with the individual
- make a written record of any decisions made or action to be taken, either by you or by social services, including what you should or should not say to the child's parent or the carer of a child or adult at risk
- ask for the name of the team manager and ensure you have the correct address for the office
- within 2 working days, follow up your telephone call with a letter or other written record to the team manager confirming the report you have made, who it concerned, what the concerns were and who the report was made to. Keep a copy of the letter/report form
- keep a written record of your report, including any decisions made or action taken or to be taken. Sign and date this record
- ensure all records relating to the concerns are stored in a secure place
- inform the person who first reported the concerns of the action you have taken. Offer any support that may be needed
- within two weeks and if necessary, follow up with social services or the senior manager to ascertain what action has been taken in response to your report. Make a written record of this and store securely with the other information.

Adult and Children's Services are obliged by the Wales Safeguarding Procedures to acknowledge your report and decide on what action they might take within 24 hours. They are also obliged to inform you of the outcome of the report within 10 working days. If this does not happen, you should contact social services yourself, to ascertain the outcome of the report. A signed and dated record should be kept of the outcome of the call. (See also 'What to do if you think your concerns are not being taken seriously' above).

4.5 Report to the Disclosure and Barring Service (DBS)

The Safeguarding Vulnerable Groups Act (SVGA) 2006 places a duty on employers of people working with children or adults at risk to make a report to the DBS when an employer has dismissed or removed a person from working with children or adults at risk (or would have if the person had not left or resigned, etc.) because the person has

- been cautioned or convicted for a relevant offence or
- engaged in relevant conduct in relation to children and/or adults at risk [ie, an action or inaction (neglect) that has harmed a child or adult at risk or put them at risk of harm] or
- satisfied the Harm Test in relation to children and/or adults at risk [ie, there has been no relevant conduct (ie no action or inaction) but a risk of harm to a child or adult at risk still exists]

The DBS will make an assessment to determine if the individual's name should be added to the Barred List ie, be barred from working with children or adults at risk.

A report to the DBS must be accompanied by supporting evidence. If an investigation is still outstanding or on-going when the individual leaves employment or is dismissed, this investigation should still be completed to enable comprehensive supporting evidence to be submitted. If additional information becomes available subsequent to the report, that also should be forwarded to the DBS. All reports to the DBS should be made on their report form.

DBS Helpline: 03000 200 190

Website: www.gov.uk/dbs

5 CONFIDENTIALITY AND DATA PROTECTION

All children and adults at risk are entitled to have their privacy and that of their families protected.

But where there are concerns about the safety or welfare of a child or an adult who might be at risk, or where a criminal act might have occurred or could be prevented, there is nothing in any legislation that prohibits the sharing of personal and sensitive information.

In fact, all relevant guidance highlights the responsibility to pass on concerns so that any safeguarding action can be taken. However, such information will be shared on a 'need to know' basis and will comprise only the information necessary to effect such action (see also

<https://gov.wales/sites/default/files/publications/2019-09/information-sharing-to-safeguard-children-and-adults.pdf>

Accordingly, all safeguarding matters will be restricted in the first instance and as required to individuals within the College's Safeguarding Group, Senior Management Team and Board of Directors. The Safeguarding Group is responsible for assessing the information to be shared on a case-by-case basis.

6 ABUSE OF TRUST

Pre-Higher Education staff will not, under any circumstances, form a relationship with a student that may have romantic or sexual connotations – even if the relationship is mutually consensual and irrespective of the age of consent. To do so, is an abuse of trust and will be subject to disciplinary procedures. You could also be liable to criminal prosecution.

7 WHAT MIGHT MAKE YOU WORRIED ABOUT A CHILD OR AN ADULT AT RISK?

Generally, children and adults are safe and well cared for, both by their families and the organisations that provide activities or care for them. However, children and adults can be abused or neglected by someone inflicting harm or failing to act to prevent harm. Children and adults may be abused in a family, in an organisational or community setting, by those known to them or, more rarely, by a stranger. Children and adults from all walks of life, cultures and religions may suffer abuse or neglect.

Abuse of children may be:

- physical - e.g., being hit or deliberately burnt
- sexual - e.g., being used for someone else's sexual gratification, whether or not the child is aware of what is happening
- neglect - e.g., not being adequately cared for, not getting necessary medical or dental treatment, or
- emotional - e.g., being scapegoated or continuously criticised. Emotional abuse is a factor in all categories of child abuse, but can occur alone.
- financial

(see Appendix 1 for full definitions plus signs and indicators).

Children themselves report that they find bullying by other children or young people extremely hurtful. The effects of bullying, like abuse, can last into adulthood and affect someone's emotional well-being. Complaints or allegations of bullying should always be taken seriously, and appropriate action taken. The Anti-Bullying Code and Under-18 Students' Charter support such action.

Sexual Exploitation is the coercion or manipulation of children, young people or adults who may be at risk, into taking part in sexual activities. It involves an exchange of some form of payment, which can include:

- money, mobile phones and other items such as clothing
- drugs, alcohol
- a place to stay, 'protection', affection

The vulnerability of children and the grooming process employed renders children powerless to recognise the exploitative nature of relationships and therefore unable to give informed consent.

Abuse of Adults at Risk may be:

- physical – e.g., being hit or misuse of medication or restraint
- financial – across a range of inappropriate or criminal behaviour
- sexual – sexual acts to which the adult has not or could not consent, or has been pressurised into consenting
- psychological/emotional – e.g., verbal abuse and threats, deprivation of contact or isolation
- neglect or acts of omission – e.g., withholding the necessities of life or ignoring such needs
- discriminatory abuse – e.g., verbal or physical abuse based on or directed towards an individual's ethnicity, disability etc.
- institutional abuse - routines, systems and regimes of an institution resulting in poor or inadequate standards of care
- abuse of trust - actions or omissions of someone who is in a position of power or authority and who uses their position to the detriment of the health and well-being of a person at risk

See Appendix 1 for full definitions, plus signs and indicators.

You may become worried about a child or adult because

- A child or adult may tell you something that makes you worried about their safety, or the safety of another child or adult.
- Someone else may report that a child or adult has told them that - or they are very worried that - a child may be being harmed.
- A child or adult may show physical injury for which there appears to be no satisfactory explanation.
- A child's or adult's behaviour may make you concerned that they may be being harmed.
- Something in the behaviour of another adult, or the way they relate to a child or adult, makes you feel uncomfortable and anxious.
- Something about the child's or adult's use of social media might make you concerned.
- You may observe a child or adult abusing or bullying another.

IF YOU ARE WORRIED ABOUT A CHILD OR AN ADULT WHO MAY BE AT RISK, YOU NEED TO SHARE YOUR CONCERNS AT THE EARLIEST OPPORTUNITY (see 'How to Respond to Concerns' below).

- You are not expected to be an expert, and in fact, it is not your responsibility to decide if a child or adult is being harmed. Social services and the police have the duty to investigate possible child abuse. Adult Social Care, the police and regulatory bodies have the authority and expertise to investigate possible adult abuse.
- However, if you are worried, then it is your responsibility to pass on any concerns you might have, following these procedures. The information you have may not seem significant to you, but it may be crucial when put together with information held elsewhere.
- If you think your concerns are not being taken seriously, then it is your responsibility to take that forward.

8 HOW TO RESPOND TO CONCERNS ABOUT A CHILD OR ADULT AT RISK

There are many reasons why professionals and other adults do not respond to concerns that a child or adult at risk may be being harmed. For many of us, our natural inclination is to seek an alternative explanation for any concerns we may have. However, unless we can entertain the possibility and are aware of and alert to signs of possible abuse, we may leave a child, children or adults at risk, vulnerable and unprotected.

The safety and welfare of children and adults at risk must be our paramount consideration. Protective action and support to families from the statutory authorities allows many, many children to live safe, fulfilled lives and can also support adults at risk to make informed decisions about their own circumstances.

Reporting concerns

ALL CONCERNS ABOUT THE SAFETY OR WELFARE OF A CHILD OR ADULT MUST BE REPORTED TO THE DESIGNATED PERSON FOR SAFEGUARDING AT THE EARLIEST OPPORTUNITY (see above for contact details).

If the designated person for your activity is not easily available, share the information with another DSO or the Lead Safeguarding Officer.

If none are available

- for children and young people - seek advice and support from Cardiff Children's Access Point on 029 2053 6490 or the NSPCC 24hr Helpline on 0808 800 5000 (in Welsh or English)
- for adults - seek advice and support from the Adult Safeguarding Team on 029 2233 0888 or the Emergency Duty Team on 029 2078 8570 during out of office hours
-

In cases of urgency – e.g. the child or adult feels unsafe to go home – contact the police on 101 or Cardiff Children's Access Point on 029 2053 6490 or the Adult Safeguarding Team on 029 2233 0888 or the Emergency Duty Team on 029 2078 8570 during out of office hours.

In an emergency – i.e. the child or adult is at immediate risk of harm or needs emergency hospital treatment, phone 999 in the usual manner.

A concise record should be kept of all unilateral action taken, making sure that names and contact details of all professionals consulted and/or involved are included along with decisions made (see Appendix 3 for additional information).

In all cases, the Designated Person should be informed retrospectively of all action taken. This should be done as soon as possible, and the written record forwarded to them. The written record of your concerns, together with decisions made and action taken or to be taken, should be made, dated and signed by both you and the Designated Person. The Designated Person will decide on what further action needs to be taken and will keep you informed of decisions and action within the bounds of professional confidentiality.

If you think your concerns are not being taken seriously, or insufficient action is being taken by the Designated Person and you cannot resolve this internally, then you should contact the outside agencies listed above and make a direct report.

Staff support

The Designated Person will offer support to staff reporting concerns about a child, adult at risk or other member of staff. As a member of staff, you are also entitled to support from the College's Counselling Service counselling@rwcmd.ac.uk You may also seek additional help and guidance from your trade union. These sources of support are available equally to a member of staff who faces allegations of inappropriate behaviour, abuse and/or neglect

9 PARTICULAR SITUATIONS

If a child or adult at risk tells you of abuse

It is usually extremely difficult for a child or adult at risk to tell of abuse and it is important to consider carefully how to respond. It is not possible to promise complete confidentiality as the information will have to be shared so that necessary action can be taken to stop the abuse and protect the child or to assist the adult in making an informed decision about their circumstances.

The following guidance should be observed

1. If the child or adult at risk has speech or language difficulties, ensure they have access to their preferred communication aid or to an interpreter or intermediary completely independent of the concerns.
2. Stay calm and listen/attend carefully to what the child or adult is communicating.
3. Allow the child or adult to continue at his or her own pace and do not interrupt.
4. Keep questions to a minimum – only ask questions to help you understand what you are being told. Do not ask about explicit details and do not ask questions that imply a particular answer.
5. Do not promise to keep the information confidential. Explain that any information that indicates a child may be being harmed needs to be passed on so that something can be done about it. It is not alright that children are hurt by adults, who should be looking after them, or by other children.
6. Explain to an adult that their information needs to be passed to others who can support them and help them decide what they want done.
7. Reassure the child or adult that they have done the right thing in telling you. Tell the child or adult what you will do next and who you have to share the information with.
8. Check any immediate or short-term safety needs (eg, does the child/adult feel safe to return home? Might others also be at risk?)
9. As soon as you can, record in writing what has been said, using the child or adult's own words and including any significant names and dates. This can be done in the presence of the individual so you can check you understand correctly. Sign and date the account.
10. Share your information as soon as you can with the Designated Person (see above).

Indirect Concerns

Suspicion about child abuse may take the form of 'concerns' rather than 'known facts'. Child welfare concerns can arise in many different contexts, including when a child is already known to Children Services.

Concerns can and should be shared with Children Services through a report.

While concerns will not necessarily trigger an assessment or investigation, they help to build up a picture, along with concerns from other sources, which suggests that a child may be suffering harm.

Domestic Abuse can occur in any family, or couple relationship, including same-sex, elder, teenage or adult at risk couples. Exposure to domestic abuse can have many long-term negative effects for children or young people and is recognised as a significant factor in emotional abuse. Domestic abuse can result in death to a partner. Where you become aware that a child or adult at risk is exposed to, or involved in, a domestically abusive relationship, you must share your concerns with the Designated Person.

Grooming

Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so that they can manipulate, exploit and abuse them.

Children who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

Children and young people can be groomed online, in person or both – by a stranger or someone they know. This could be a family member, a friend or someone who has targeted them – like a teacher, faith group leader or sports coach. When a child is groomed online, groomers may hide who they are by sending photos or videos of other people. Sometimes this will be of someone younger than them to gain the trust of a "peer". They might target one child online or contact lots of children very quickly and wait for them to respond.

<https://learning.nspcc.org.uk/research-resources/briefings/grooming>

Internet and Social Media can present risks as well as opportunities. Children, young people and adults may be bullied or abused via social media and other electronic sites. They may also use this medium to abuse or bully others. Risks include

- grooming and online sexual abuse
- grooming to meet
- grooming as part of an established face-to-face relationship
- involvement in producing sexual or child abuse images
- exposure to pornography and/or violent content
- cyber-bullying - receiving unwanted and unpleasant texts, images or other content, or sending them
- inadvertent criminal behaviour e.g., creating and sharing of nude and/or semi-nude images, videos, or live streams by young people under the age of 18 years. This term has changed from 'sexting' to ensure greater clarity and to encompass all types of image-sharing incidents.

<https://hwb.gov.wales/api/storage/6ad01b82-3a2c-4bf4-bd21-f5bac42655a4/sharing-nudes-and-semi-nudes-guidance-for-education-settings-in-wales-final-english-011220.pdf>

If you become concerned about a child or adult's use of electronic communication, you should share your concerns as soon as possible with the Designated Person.

Working in schools

Schools have a statutory responsibility for the safety and welfare of their pupils or students. If you become concerned about a child or about the behaviour of an adult (including teachers and members of staff) towards a child or children, you should

- report your concerns to the school's Pastoral Care/Safeguarding Officer
- make a written record of your concerns and who you reported to
- include details of any decisions and action taken or to be taken
- sign and date the record and ask for a signature from the individual you reported to
- at the earliest opportunity, inform your Designated Person for Safeguarding of the action you have taken
- ensure the Designated Person has a copy of your written record

Behaviour of Others

If you become concerned about the behaviour of an adult, including staff members or tutors, towards a child or children or adult at risk it is very important that you do not dismiss the concerns

- do not confront the person about whom you have concerns
- do not think you need to wait to get more 'evidence'
- do not allow yourself to be intimidated by the individual's status, job title or authority over others
- share your concerns as soon as you can with the Designated Person (as above)

If your concerns relate to a Designated Person, share them with the other Designated Person, or if unhappy about this, with the Lead Safeguarding Officer (see above)

If you feel unhappy about sharing information about a member of staff or colleague within the College, then you should contact

- the police on 101 or
- Cardiff Children's Access Point on 029 2053 6490 or
- for children, the NSPCC 24hr Helpline on 0808 800 5000
- for adults, the Adult Safeguarding Team on 029 2233 0888

It is important to have shared these concerns even if later they may be seen to be unfounded. Those who seek to abuse children or adults at risk can be clever in disguising their intent and concerning behaviour needs to be noted and assessed.

As a last resort

If you have reported serious concerns about the behaviour of a member of staff or a volunteer, where that behaviour may constitute a criminal offence, or may have harmed or be likely to harm a child or children, and you remain unconvinced that this is being, or has been, properly dealt with either within the College or by the external agencies, then you can contact the office of the Children's Commissioner for Wales on 01792

'Whistleblowing' Statement

Any member of staff or any student concerned about the behaviour of other tutors, managers, volunteers, students or others which may be harmful to those in their care, should share their concerns with the Designated Person without prejudice to their own position.

You will receive appropriate support in accordance with the Public Interest Disclosure Act 1988 and the College's Public Interest Disclosure (Whistleblowing) Procedure (available on the College's Hub).

The College will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

Staff who wish to access free confidential advice about whistleblowing can contact 'Protect' on 020 3117 2520 or visit their website at <https://protect-advice.org.uk/>

Advice to Consult

You should also consult with the Designated Person in the following circumstances

- if a child or adult at risk is accidentally hurt
- if you are concerned that a child or adult at risk is becoming attracted to you or a colleague

- if you are concerned that a colleague is becoming attracted to someone in their care
- if a child or adult at risk misunderstands or misinterprets something you have done or said

Confidentiality Reminder

Any concerns or reports about possible harm to a child or adult must be treated in the strictest confidence and with respect for the privacy of the child and family or individual involved and should only be discussed with those who 'need to know' in order to decide on any safeguarding action.

10. ONLINE SAFETY

We recognise that, while the online world provides many opportunities, it can also present risks and challenges. We have a duty to ensure that all children and adults at risk who are involved in the College's online activity are protected from potential harm, whether or not they are using the College's network and devices.

Online abuse can occur as bullying/cyberbullying, emotional abuse, sexual abuse and sexual exploitation (see also 'Internet and Social Media' above).

If you are concerned about the online safety of a child or adult at risk, report your concerns as outlined in section 4.4 above.

The Online Safety Policy Statement for Staff sets out the measures in place for ensuring the online safety and wellbeing of children and the overarching principles that guide our approach to online safety. The principle measures are

- designation of the Heads of the Junior Conservatoire and Young Actors Studio as online safety coordinators
- provision of a code of conduct for staff working online
- provision of supervision and support for staff and students working online
- provision of an online safety agreement for students and their parents/carers
- provision of a clear procedure for responding appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person
- ensuring that usernames, logins, email accounts and passwords are used appropriately and effectively
- examining and risk assessing any social media platforms and new technologies before they are used for activities involving children

Further online safety advice is available at

- <https://learning.nspcc.org.uk/safeguarding-child-protection>
- <https://hwb.gov.wales/zones/keeping-safe-online>

APPENDIX 1: DEFINITIONS OF ABUSE OR HARMFUL BEHAVIOUR

Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of a single act or repeated acts. It may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person or child subjected to it. Abuse is about the misuse of power and control that one person has over another. Where there is dependency, there is a possibility of abuse or neglect unless adequate safeguards are put in place.

1. CHILDREN

For the purposes of this document, a child is anyone under the age of 18 years. The following represents the main categories of abuse used by the statutory authorities when considering the safety of a child.

(See below for categories for adults at risk).

Physical Abuse This may involve a child being hit, shaken, thrown, poisoned, deliberately burned or scalded, drowned, suffocated or other ways of causing physical harm to a child. It may also be caused when a parent or carer fabricates or induces illness in a child whom they are looking after.

Sexual Abuse occurs when someone forces or entices a child to do sexual things, even if the child does not know what is going on. The activities may involve physical contact, including penetrative or non-penetrative acts. It may include non-contact activities, such as involving children in looking at, or in the production of pornographic material, or making the child watch sexual activities, or encouraging children to behave in a sexual way.

Neglect occurs when a parent or carer persistently fails to meet the child's physical or psychological needs, including failure to provide adequate food, shelter and clothing, failure to protect the child from physical harm or danger or failure to access appropriate medical care or treatment for the child. It can also include neglect of, or unresponsiveness to a child's basic emotional needs. Neglect may also occur during pregnancy as a result of maternal substance misuse.

Emotional Abuse This is when a parent or carer criticises a child so that they feel worthless, or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being placed on the child. This might also happen when a parent allows their child to be often frightened or feel in danger, eg witnessing domestic violence or being bullied, or if the parent doesn't protect the child from people who are going to exploit or corrupt the child.

Other Harmful Behaviour

Bullying is not defined as a separate category by the authorities, but the following definition is useful.

Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

It can be

- Physical ~ hitting, kicking, theft
- Verbal ~ racist or homophobic remarks, threats, name calling

- Emotional ~ isolating an individual from the activities and social acceptance of their peer group.
- The inappropriate use of mobile phones and other social media to emotionally harm another.

Sexual Exploitation is the coercion or manipulation of children and young people into taking part in sexual activities. It involves an exchange of some form of payment, which can include

- money, mobile phones and other items
- drugs, alcohol
- a place to stay, 'protection', affection

The vulnerability of the child and the grooming process employed renders the child powerless to recognise the exploitative nature of relationships and unable to give informed consent. It includes

- abuse through sexual exploitation
- abuse through using children to produce child sexual abuse images and material
- abuse through grooming, whether via direct contact or the use of technologies such as mobile phone or the internet
- abuse through trafficking for sexual purposes.

Sexually Harmful Behaviour Harmful sexual behaviour involves one or more children or young people engaging in sexual discussions or acts that are inappropriate for their age or stage of development. These can range from using sexually explicit words and phrases to full penetrative sex with other children or adults. Two thirds of contact sexual abuse of children is committed by peers. When this situation is identified, or concerns are raised, a report must be made to social services so that the needs of both the victim and the child allegedly exhibiting sexually harmful behaviour can be assessed.

Domestic Abuse can occur in any family or couple relationship, including same-sex, elder, teenage or adult at-risk couples. Domestic abuse includes physical, sexual, psychological, or economic harm or suffering, including threats of such acts, coercion or arbitrary deprivation of liberty. Exposure to domestic abuse can have many long-term negative effects for children or young people and is recognised as a significant factor in emotional abuse. Domestic abuse often begins or escalates during pregnancy and the unborn child can be targeted directly.

2. ADULTS AT RISK

Physical Abuse

Physical abuse is the unnecessary infliction of any physical pain, suffering or injury by a person who has responsibility, charge, care, or custody of, or who stands in a position of, or expectation of, trust to a vulnerable person. Physical abuse may also be perpetrated by one adult at risk upon another.

Sexual Abuse

Adult sexual abuse refers to the direct or indirect involvement of an adult at risk in sexual activity to which they are unwilling or unable to give informed consent, or which they do not fully comprehend, or which violates the social taboos of family roles, eg, incest. Sexual abuse may also be perpetrated by one adult at risk upon another. Any sexual activity that is not freely consenting is criminal. Where there is an abuse of trust, sexual activity may appear to be with consent, but is unacceptable because of the differences in power and influence between the people involved.

Emotional or psychological abuse is the wilful infliction of mental suffering by a person in a position or expectation of trust, to a vulnerable person. It can include verbal assault, eg, shouting, screaming, humiliation, threats, depriving a person of due respect, denial of dignity and affection, bullying.

Financial or material abuse is any theft or misuse of a person's money, property or resources, by a person in a position of, or expectation of, trust to a vulnerable person. It can include gaining money or possession by threat, persuasion, or exploitation, blocking access to assets, extortion, falsifying records.

Neglect is the failure of any person having the responsibility, charge, care or custody of a vulnerable person to provide that degree of care which a reasonable person in a like position would provide. It can involve intentional or unintentional acts. It includes the unintentional failure of a carer to fulfil their caring role or responsibilities, because of inadequate knowledge or understanding the need for services.

Other Harmful Behaviour

Mate crime

Mate crime is a type of hate crime where perpetrators befriend a person with a disability but in fact soon begin to exploit, hurt, or harm them. This can include sexual abuse, forced prostitution, financial exploitation, physical abuse, violence and even murder.

Institutional Abuse can occur in institutions as a result of regimes, routines, practices and behaviours that occur in services that adults at risk live in or use, and which violate their human rights. This may be part of the culture of a service to which staff are accustomed. Thus, such practices may pass by unremarked upon by staff. They may be subtle, small and apparently insignificant, yet together may amount to a service culture that denies, restricts or curtails the dignity, privacy, choice, independence or fulfilment of adults at risk.

Abuse can take many forms. It does not have to fit comfortably into any of the above. Abuse can be perpetuated by one adult at risk towards another. This is still abuse and should be dealt with accordingly.

3. SOME INDICATORS OF POSSIBLE ABUSE

Many indicators will be the same for children, young people or adults at risk. These lists give examples only and are not by any means exhaustive. If you have concerns about anything not in a list, you should still report your concerns to the Designated Person in accordance with the procedures above.

PHYSICAL ABUSE

Bruises that may be indicative of possible physical abuse are

- bruising in babies
- bruising in children or adults who are not independently mobile
- bruising that is not on the bony parts of the body
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- bruises in clusters
- a number of bruises of a regular shape, eg, fingertip bruising
- bruises that carry an imprint, eg of an implement, or cord, or hand
- bruising where the explanation seems unlikely

Other signs of physical abuse might be

- cigarette burns
- adult bite marks
- cuts, scratches, lacerations
- broken bones
- scalds, especially if of a regular shape or the explanation seems unlikely
- flinching when touched or approached
- fear of parents/carers being asked about a bruise or other mark.

SEXUAL ABUSE

- sexual knowledge beyond the child's or adult's age or developmental stage
- inappropriate sexualised behaviour
- sexualised language or drawings
- stomach pains or pains when using the toilet
- urinary infections
- pain or itching in the genital area
- bruising or bleeding in the genital area
- referring to a secret they can't tell anyone about
- self-harming behaviour
- nightmares

Children or adults at risk may disclose sexual abuse by directly telling someone about it. They may also disclose less directly, sometimes unintentionally, over a period of time, through a variety of behaviours and actions, including discussions and indirect non-verbal cues. In this respect, disclosure should be seen as a process that occurs over time.

NEGLECT

- being constantly hungry, possibly stealing food from other children
- constantly dirty and/or smelly
- being very underweight or losing weight
- clothes not appropriate for the weather conditions
- being constantly tired or appearing depressed
- not getting appropriate medical or dental attention
- failure to obtain/ facilitate use of necessary prosthetic devices, dentures, glasses, hearing aids, or durable surgical equipment
- pressure sores
- talking about being left alone
- frequently being left unsupervised, especially if in risky or dangerous situations.

Neglect can also be life threatening. Children who are neglected can suffer long-term physical and emotional damage. However, it can be difficult to recognise, especially where families or individuals are living in poverty.

EMOTIONAL ABUSE

- a failure to thrive or grow, especially if the child puts on weight when not in the care of his or her parents
- developmental delay in physical or emotional progress
- nervous behaviour, e.g., rocking, hair twisting
- signs of depression, suicidal ideation
- being unable to play and/or interact with others
- self-harming behaviour, e.g. severe scratching, cutting etc.
- overly overtly subservient or anxious to please

Emotional abuse can be difficult to detect as a child or adult may appear well cared for, yet receive little or no love, affection or positive attention and/or be constantly put down or belittled. A child or adult living in an environment of low warmth and high criticism is likely to suffer emotional abuse.

FINANCIAL ABUSE

- preventing a person from accessing their own money, benefits or assets
- misuse of benefits or direct payments in a family home
- individual deprived of access to own money
- missing personal items, especially jewellery or items of value
- someone moving into a person's home and living rent free without agreement or under duress
- false representation, using another person's bank account, cards or documents
- exploitation of a person's money or assets, eg, unauthorised use of a car
- unexplained disappearance of financial documents, eg, building society books and bank statements, payments or order books
- signatures on cheques do not resemble the adult at risk's signature, or signed when this person cannot write
- unusual concern by carer that an excessive amount of money is being expended on the care of the adult at risk
- lack of amenities such as TV, appropriate clothing, personal grooming items that the adult at risk can well afford.

APPENDIX 2: CAPACITY, CONSENT, CONFIDENTIALITY AND INFORMATION SHARING

1. MENTAL CAPACITY

Adults at risk may have or may lack mental capacity to make specific decisions. Their vulnerability entitles them to protection from abuse and neglect but if they lack capacity, they may be especially vulnerable. The Mental Capacity Act 2005 specifies that:

‘... a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain’.

A person is not able to decide if they are to be assessed if they cannot:

- understand the information relevant to the decision, or
- retain that information, or
- use or weigh that information as part of the process of making the decision, or
- communicate their decision (whether by talking, using sign language or any other means).

IT IS NOT THE ROLE OF THE DESIGNATED PERSON OR ANY OTHER MEMBER OF STAFF TO DECIDE IF A ADULT AT RISK HAS CAPACITY. All concerns should be reported in accordance with the procedures.

2. CONSENT

The age of consent for intercourse is 16 years old.

A child under the age of 18 years CANNOT consent to sexual activity with a person with whom they have a Relationship of Trust (Sexual Offences Act 2003).

A child under the age of 13 cannot consent to sexual activity (Sexual Offences Act 2003).

In any circumstances, for consent to be valid, the ability to refuse consent must be respected.

To give valid consent, an individual should have sufficient information to understand the options.

Any coercion of an individual to consent invalidates the consent.

3. ‘GILICK COMPETENCE’ AND THE ‘FRASER GUIDELINES’

When deciding whether a child is mature enough to make decisions, people often talk about whether a child is 'Gillick competent' or whether they meet the 'Fraser guidelines'. These refer to a legal case which looked specifically at whether doctors should be able to give contraceptive advice or treatment to under 16-year-olds without parental consent. But since then, they have been more widely used to help assess whether a child has the maturity to make their own decisions and to understand the implications of those decisions.

Since the Gillick case, legal, health and social work professionals continue to debate the issues of a child's rights to consent or refuse treatment, and how to balance children's rights with the duty of child protection professionals to act in the best interests of the child. For the purposes of this document,

where indicated, advice concerning Gillick competence should be sought from Children's Services as part of considering or making a report.

4. CONFIDENTIALITY AND INFORMATION SHARING

As a general rule, all personal information acquired or held in the course of working with children and families is confidential and particular care should be taken with sensitive information. However, sharing information between practitioners is essential, particularly when there are concerns about the safety or welfare of a child or adult at risk.

There is no problem about sharing personal information about an individual if that person, or for a child, someone with Parental Responsibility, has given permission. Good practice would therefore dictate that, wherever possible, a child's parent/carer should be informed if a report is to be made about their family to social services. However, this should not be done if you think it would increase the risk to the child or be contrary to the child's welfare. You should also not seek permission if to do so could obstruct a criminal investigation, eg where allegations of sexual abuse have been made.

Information about an individual is not confidential information if it is already in the public domain, eg, what school a child attends, or even if that child attended school that day.

When sharing personal information, you should consider

- who needs to know and
- what do they need to know.

In other words, the information given should be necessary to safeguard a child or children and should be shared with those who have the responsibility to decide what action needs to be taken – the 'need to know' basis.

The Data Protection Act 1998 stipulates that 'personal data shall be processed fairly and lawfully'. 'Fairness' is being open with people about how information about them is to be used and the circumstances in which it might be disclosed. It is therefore important that the parents, carers of children or adult at risks and our students are made aware of the child protection policy and the action that will be taken if there are concerns about a child or adult at risk.

APPENDIX 3 REPORTING A CONCERN: SUMMARY OF INFORMATION REQUIRED

Disclosure Details

Name of student

Name of person(s) completing notes and/or form

Date and time of disclosure

Location of disclosure

Student's disclosure (in student's own words. Continue on separate sheet if necessary)

Additional personal details required for report to safeguarding officers

name, date of birth, address of child or adult at risk

names, addresses, contact details of parents/carers

name of those with parental responsibility for the child (if different and if known)

name, address, contact details and present whereabouts (if known) of any alleged abuser

State briefly what you have told the child/adult at risk you will now do and who you will share the above information with.

State any immediate safeguarding needs to be addressed.

State next steps to be taken, including

name of person to whom concern is referred, date concern has been shared. follow up action taken

Signature of person reporting concern _____

APPENDIX 4 PREVENT PROTOCOL

Introduction

The Government has published 'Prevent Duty Guidance: Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism'. Specified authorities, which includes HEIs, are required to be legally compliant.

1. WHAT IS PREVENT?

PREVENT is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The paper, '2010 to 2015 Government Policy: counter-terrorism', published 7th May 2015, says:

"The PREVENT strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

This is often commonly referred to as the three I's: Ideology, Individuals and Institutions.

2. WHAT ARE THE RISKS?

The Home Office Duty Guidance makes specific reference to the following risks:

- some students may arrive at University/College already committed to terrorism
- some may become radicalised while at University/College
- students may use the Internet to access information that can be used for terrorist activity
- visiting speakers at events on campus may encourage extreme views or incite violence
- students with extreme views may influence their fellow-students through word of mouth or social media
- There is also the risk that in implementing the PREVENT agenda an atmosphere of suspicion may be created which could be counterproductive.

The Duty Guidance makes reference to the need for appropriate staff training, chaplaincy and welfare support, IT, external speaker and freedom of speech policies to counter the risk of students being vulnerable to radicalisation.

3. WHAT ARE THE COLLEGE'S OBLIGATIONS?

The Prevent Duty Guidance states:

- “In fulfilling the duty in section 26 of the Act, we expect all specified authorities to participate fully in work to prevent people from being drawn into terrorism.” (para 12)
- “All specified authorities must comply with this duty and will be expected to maintain appropriate records to show compliance with their responsibilities and provide reports when requested.” (para 23)

The document PREVENT Duty Guidance for higher education institutions in England and Wales (2015) includes the statement:

- “Universities will be expected to carry out a risk assessment for their institution which assesses where and how their students might be at risk of being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.” (para 19)

This means that the Royal Welsh College of Music and Drama's compliance is based on a specific institution wide risk assessment.

4. STATEMENT OF POLICY

The Royal Welsh College of Music and Drama is an inclusive institution which aims to provide an environment where individuals are enabled to meet their full potential and to express themselves freely within the law.

The College is a diverse academic community and values the richness that diversity and difference bring to the academic life of the institution and our ability to engage globally. Diversity adds value to the student experience and to the College. Central to this concept is the ability of all its members freely to challenge prevailing orthodoxies, query the positions and views of others and put forward radical ideas that may sometimes be controversial. An environment of free and open discussion is essential to the development of lively, enquiring minds and the ability to question, argue and listen that is a central element in Higher Education.

At the same time, the College is committed to creating a context in which staff and students can work and study unhindered by hostility, offensive conduct or intimidation. Staff and students are expected to respect this in the manner and tone with which they express their views. This principle extends to conduct online and on social media.

Higher Education does not exist in a vacuum. Wider conflicts and disputes, often involving ethnicity or religious faith, may sometimes find expression on campus amongst the College's community. The challenge for Higher Education is to identify when the pursuit of freedom of ideas and expression crosses a threshold and becomes harmful.

Staff are required to do all they can to mitigate grievance at the earliest possible stage and to avoid taking any action or making any statement that may exacerbate a grievance. Appropriate reports should be made through the PREVENT processes at an early stage.

The College recognises that people with radical views have things to say. In the context of the College community, it is important that such views are expressed in a way which makes clear that they are not conducive to, or supportive of, causing harm or violence or promoting or inciting hate.

The PREVENT Duty Guidance is a new and developing area of responsibility placed on the College by Government. The College will be guided in its compliance procedures by government, wider HE partnerships and other statutory bodies.

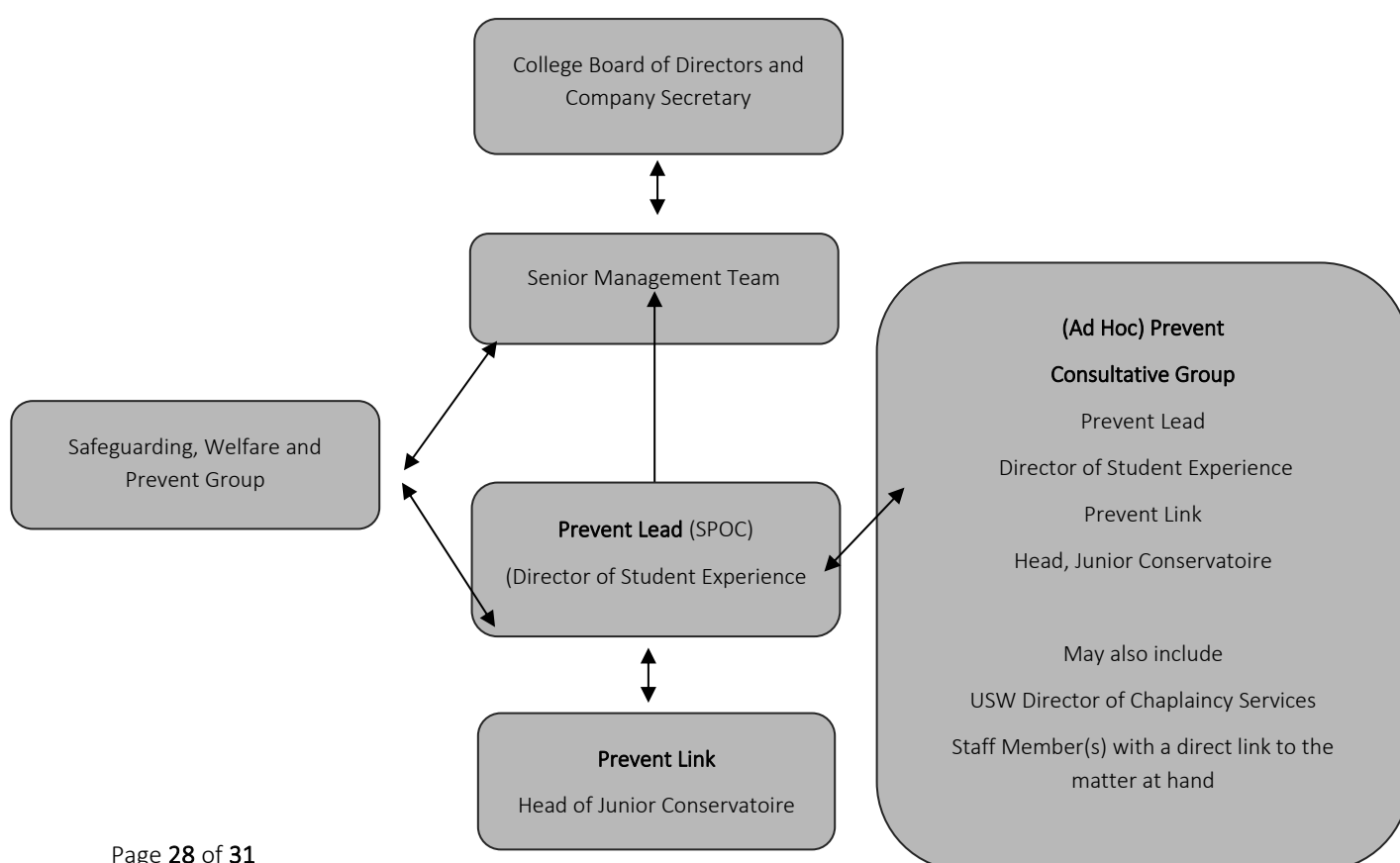
General legal principles, and in specific areas legislation, provide that the proportionate and reasonable limitation of expression is permissible in order to maintain public order and safety or to ensure that there is no breach of the law. Whilst the College recognises the right of staff and students to express opinions contrary to the corporate view, the right to freedom of speech is not absolute. The College will, on occasion, have to weigh conflicting demands for free public expression of ideas against concerns on its part regarding public order and safety or the potential for breaches of the law to occur.

Furthermore, the College has a duty under the Counter-Terrorism and Security Act 2015 to prevent staff and students from being drawn into terrorism and ensure they are being given appropriate advice and support.

The College acknowledges that it has both a legal and a moral responsibility to act in a proactive manner in order to minimise the possibility that harmful extremism or intolerance will arise on campus whilst at the same time ensuring the general continuance of freedom of speech.

5. STRUCTURE

The diagram overleaf is an outline of the structure for implementing the PREVENT compliance agenda:



6. ROLES AND RESPONSIBILITIES

The Head of Junior Conservatoire has the function of Responsible Officer/PREVENT Link and will:

- be familiar with the College's PREVENT Protocol and develop other policies
- be trained in PREVENT issues and the College's PREVENT procedures and protocols
- be available to give initial and informal advice to staff
- receive queries or expressions of concern from staff and students
- receive applications for inviting external speakers for extra-curricular events and decide on applications they deem to be non-controversial
- refer as appropriate any issues of concern or potentially controversial speaker applications to the PREVENT Lead (SPOC)
- be a link between the College PREVENT Lead (SPOC)
- keep a record of all relevant conversations, applications and their outcomes.

The Director of Academic Administration & Student Experience will be the PREVENT Lead (SPOC) and will:

- be the Single Point of Contact (SPOC) directly accessible to all staff
- be available to give initial and informal advice to staff
- receive expressions of concern from Responsible Officers/PREVENT Links. These may be resolved by informal conversation, but if there seems to be a real matter for concern, the PREVENT Lead (SPOC) will gather information in order to build as full a picture as possible of the situation, consult with key staff and decide what action if any needs to be taken
- be forwarded any external speaker applications that may be considered controversial
- consult when necessary with the Regional PREVENT Coordinator and others
- as appropriate, consult the Principal/University Director of Chaplaincy
- be the point of reference for all PREVENT issues internally and externally
- keep a record of all relevant conversations, applications and outcomes.

A key group of staff will support the PREVENT Lead (SPOC) and Responsible Officers on an issue-by-issue basis. The Group may include:

- PREVENT Lead (SPOC)
- Responsible Officers
- USW Director of Chaplaincy Services

Other members of staff who may have a direct link to the matter at hand.

7. INTERNAL REPORTING PROCESS

Anyone who suspects a student or a member of staff is becoming involved in non-violent/violent extremism and/or terrorism should contact the Director of Student Experience or Head of Junior Conservatoire for an informal conversation. If a concern persists, they should formally report the matter.

If a concern is referred to a Responsible Officer/ PREVENT Lead, the following process will be followed.

The Responsible Officer/PREVENT Link will undertake a brief risk assessment and may consult relevant colleagues discreetly.

If the PREVENT Link believes that a concern has been reasonably substantiated, they will refer the matter to the College PREVENT Lead. The Responsible Officer/PREVENT Link will keep a record of any concerns expressed and any action or decision not to take action.

The College PREVENT Lead may consult with senior colleagues in order to build a clear picture and context for the concern and will decide whether a report to the PREVENT Channel Project is appropriate or whether alternative supportive action is necessary.

The PREVENT Lead will keep the Company Secretary informed.

8. EXTERNAL REPORT PROCESS

If a concern cannot be satisfactorily resolved internally, a PREVENT report will be made as the initial step in ascertaining suitability for admittance onto the CHANNEL Project.

A PREVENT report is made initially to the Channel Coordinator. This report is assessed for suitability to be forwarded to the Channel project.

The Channel Project operates across England and Wales as a key part of the Government's Prevent strategy. It is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.

The PREVENT Lead (SPOC) will be the sole point of report for the institution. In their absence, the College Senior Management Team will authorise an alternative.

Where this would not constitute a danger to individuals or groups, the person being referred will be informed of the report at the time transfer to the CHANNEL project is made.

The Chaplaincy will offer support to the individual through the report process and the CHANNEL programme and liaise with other support services to coordinate a holistic support network for the student.

The Chaplaincy will offer a comfortable and safe environment within which students going through the CHANNEL programme may be supported.

9. REPORT FOR CONSIDERATION UNDER OTHER UNIVERSITY REGULATIONS

Following consideration of all the facts, it may be considered appropriate for a student to be referred to other College regulations, such as the Student Conduct Regulations or Fitness to Study Regulations. In this case, the PREVENT Lead will liaise as appropriate with the Director of Student Experience and/or Head of Academic Services.

Following consideration of all the facts, it may be considered appropriate for a staff member to be referred to the College's disciplinary procedures. In this case the Director of Student Experience will liaise with Human Resources.

APPENDIX 5: SAFEGUARDING TRAINING AND DBS PROTOCOL FOR STAFF WORKING WITH UNDER-18S AT RWCMD

All staff working with under-18s at RWCMD are required to take a DBS check on appointment. If an individual is subscribed to the DBS Update Service at the level required for their RWCMD post, an online check will be undertaken instead.

Tutors will be required to repeat a DBS check, or online check, every three years.

Tutors will receive mandatory safeguarding training at the appropriate level as part of their induction. Where this does not include Prevent training, separate Prevent training will be arranged. Training will normally be provided online, along with a verbal briefing on the Code of Practice for Pre-Higher Education Tutors, given by Head of Department/Course Leader.

The preferred safeguarding training providers are

- the NSPCC
- Cardiff and Vale of Glamorgan Local Safeguarding Children Board (where available)
- Children in Wales
- Cardiff Council
- Prevent training providers deemed suitable by the Home Office.

Should the training offered be identical to that received by a member of staff from another employer within the past two years, this will be accepted in lieu of RWCMD training, on production of satisfactory evidence.

Hourly paid tutors will be remunerated at half the hourly delivery rate for safeguarding training.

All members of staff are required to undertake refresher training every three years. Should they provide evidence of identical training from another employer within the required timeframe, this will be accepted in lieu.

Professional support services will ensure full safeguarding training records are kept for all staff, in accordance with GDPR regulations.

Designated Safeguarding Officers must receive safeguarding training at the appropriate level, every three years.