

## Rotunda Safeguarding Policy

### Policy Summary:

Rotunda Ltd are committed to:

- Promoting and protecting the safety and wellbeing of children, young people and adults, including staff engaged in the range of its activities.
- Preventing abuse wherever possible and ensuring that robust procedures are in place for dealing with safeguarding concerns, allegations of abuse or disclosures.
- Protecting children, young people and adults from exploitation and grooming by extremists, as defined by the Prevent duty.
- Establishing and maintaining an environment where children, young people and adults feel safe and secure, are able to talk and are listened to.
- Ensuring that clear direction is given to staff, trustees, members volunteers and others about expected behaviour and action when identifying and responding to safeguarding issues.
- Making explicit the responsibilities of everyone in relation to safeguarding children, young people and adults, including those defined as “vulnerable” or “at risk”, in response to current legislation and guidance.
- Promoting safeguarding through recruitment processes and ensuring required checks are completed prior to the appointment of any individual, in line with current legislation and good practice.

### 1. Purpose

Rotunda Ltd are committed to providing a welcoming environment where everyone is respected and valued, and can feel safe and secure. This includes students, staff, members, volunteers and individual visitors who access its facilities and services.

Rotunda Ltd applies the concept of safeguarding to students and staff in a range of situations regardless of whether they are receiving services that are classed as “regulated” activities or whether they are defined as “vulnerable” or “at risk of abuse or neglect”.

This policy applies to all senior leaders, salaried and hourly paid staff, members, volunteers, students, trustees, partnership organisations and agency or contractor staff (e.g. consultants, researchers or advisors).

## **2. Definitions:**

### 2.1 Scope of learning provision:

At Rotunda Ltd is an adult (aged 19+) learning provider with a wide scope of provision which includes adults who may be considered “at risk” or “vulnerable”. Rotunda Ltd have a children’s Nursery which falls under scope for Safeguarding. In addition, Rotunda Ltd also engage in activities and project work within community centres, children’s centres and schools which directly or indirectly involve children or young adults. Therefore this policy encompasses all age groups that are directly or indirectly involved in the Rotunda’s learning activities.

### 2.2 Child:

A child is anyone under the age of 18.

### 2.3 Adult:

An adult is anyone aged 18 or over.

### 2.4 Abuse (vulnerable or “at risk” adults):

Abuse is defined as “a violation of an individual’s human and civil rights by another person or persons”. It may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of the person subjected to it”.

(Department of Health: “No secrets, Section 2; amended by the Care Act 2014).

### 2.5 Child Abuse:

Keeping Children Safe in Education (updated September 2022) defines abuse as “a form of maltreatment”. This may involve “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 another child or children”.

Areas of abuse include sexual, physical, emotional abuse, neglect, cyber-bullying, domestic violence, drugs, fabricated or induced illness, faith abuse, forced marriage, gangs and youth violence, private fostering, female genital mutilation (FGM), gender based violence against women and girls, radicalisation, sexting, teenage relationship abuse, peer on peer abuse, initiation/hazing type violence and rituals, trafficking.

Whilst the legislation and procedures are different when responding to child protection concerns and Adult Safeguarding, most of the principles and procedures for staff are the same. Adult and child safeguarding is the responsibility of all.

### **3. Scope and Responsibilities**

#### **3.1 Responsibility of all staff**

All salaried and hourly paid staff, senior leaders, students, members, volunteers and trustees are responsible for creating an environment that promotes well-being and ensures personal safety. They will act promptly in accordance with the safeguarding policy and inform the Designated Safeguarding Person, of any issues of suspected or reported abuse of children, young people or adults.

#### **3.2 Trustees and Senior Leaders**

Trustees and Senior Leaders will receive appropriate training on safeguarding and will know their responsibilities and legislative requirements with respect to the protection of children, young people and vulnerable adults. They will comply with the "Strategy for dealing with safeguarding issues in charities" (6.12.17) to ensure that beneficiaries or others who come into contact with Rotunda Ltd do not, as a result, come to harm.

They will ensure that:

- A culture of vigilance is promoted; students and staff feel safe.
- Safeguarding policies and procedures are regularly reviewed and reflect both the law and best practice.
- There is a public commitment to safeguarding with clear information about Rotunda Ltd's approach and the Safeguarding policy on the website.
- There is a Senior Manager, normally the Operations Manager who is the overall strategic lead for Safeguarding and Prevent Rotunda Ltd.
- There is a designated safeguarding person. Safeguarding designates are trained to an appropriate level with updated training every year.
- There is a designated Association Trustee who has a responsibility for safeguarding, champions its importance, and ensures appropriate scrutiny.
- Rotunda Ltd.'s Safeguarding policy, procedures and reporting systems are implemented effectively.
- There is robust monitoring of safeguarding practice in subcontracted provision.
- There are procedures in place to handle allegations against staff and volunteers.
- Allegations of abuse against staff and volunteers are handled effectively, including submission of a serious incident report to the

Charity commission (see section 7) and a referral to the Disclosure and Barring Scheme (DBS) as appropriate.

- There is a clear approach to implementing the Prevent duty, protecting children, young people and adults from exploitation and grooming by extremists.
- Safe recruitment processes are followed; required checks are completed prior to the appointment of any individual, in line with current legislation and good practice.
- A single central record is maintained.
- Safe use of electronic and social media is promoted.
- Appropriate information sharing policies are in place.
- Appropriate whistleblowing policies are in place.

Rotunda delivers a Safeguarding Team approach, the following staff member make up the team:

- Maxine Ennis
- Ann-Marie Hutton
- Sarah Tennant
- Mark Fallon

Specific roles within the team are:

- Designated Safeguarding Lead (Rotunda Ltd): Ann-Marie Hutton
- Deputy Safeguarding Lead (Rotunda Ltd): Maxine Ennis
- Designated Safeguarding Lead (Rotunda Nursery): Sarah Tennant
- Deputy Safeguarding Lead (Rotunda Nursery): Ann-Marie Hutton
- Designated Safeguarding Trustee: Paul Musa

### **3.3** The Safeguarding Lead Officers have responsibility for:

- The safeguarding policy and framework; annual review and update.
- Implementation of the Safeguarding and Prevent Duty training plan and the development of training resources which are current and appropriate.
- Facilitating regular meetings of the Rotunda Ltd Safeguarding persons.
- Facilitating regular meetings with the designated Association Trustee who has a responsibility for safeguarding.
- Maintaining the Safeguarding and Prevent central record.
- Providing advice to the Safeguarding Designates on safeguarding issues, disclosures or referrals.
- Providing support and advice to Association Trustees, Managers and staff in dealing with matters that have a safeguarding dimension.
- Promoting a culture where all staff and volunteers feel able to raise concerns about safeguarding practice and addressing concerns in a timely manner.
- Consulting with the HR team in cases where a safeguarding disclosure involves a member of staff or volunteer and, in association with HR, managing the investigation process.
- In association with HR and the designated Association trustee, managing referrals to the Disclosure and Barring Scheme (England) and serious incidents reports to the Charity Commission, as appropriate.
- Implementation of the Prevent duty, annual risk assessment and action plan.
- Providing regular and annual reports to the SMT, the Board of Trustees and appropriate sub-committees.
- Contributing to the annual Self-Assessment and Quality Improvement processes.

### **3.4 Designated Safeguarding Officer**

The Designated Safeguarding Officer (DSO) is responsible for:

- Maintaining a culture of vigilance.
- Ensuring that all Safeguarding procedures are followed in the organisation.
- Being the first point of contact in that area should any safeguarding issues arise.
- Following the procedures set out by the organisation when dealing with an incident of concern or disclosure of abuse.
- Maintaining confidential and secure written records.
- In consultation with the Safeguarding Lead Officer, making referrals to Local Safeguarding Boards, Children's Social Care, or local Prevent officer, as appropriate.

- Working with other agencies, as required, within the framework of Local Authority Safeguarding Board Policy and Procedures.
- Maintaining the currency of their training.
- Monitoring staff safeguarding and prevent training for the safeguarding and staff team.
- Supporting investigations into safeguarding allegations against staff, as appropriate.

The Designated Safeguarding Officers within Rotunda will form a team, facilitated by the Safeguarding Lead, to share and update training and practice.

### **3.5. Line Managers**

Line managers have a responsibility to ensure that all staff members and volunteers receive training relevant to their role, according to the Safeguarding and Prevent training plan. Where appropriate, staff appraisal reviews and line manager supervision meetings should include discussion of safeguarding issues. Line managers who are also recruiting managers are responsible for ensuring that DBS checks for tutors and volunteers, as appropriate, have been completed where necessary before a course starts.

### **3.6. Recruitment Managers**

Those involved in recruiting to Rotunda Ltd will be required to recruit and select staff or volunteers carefully and safely, assessing the risk, referring to the DBS procedures without exception and seeking advice where necessary.

In relation to the recruitment of staff, the Rotunda Ltd undertakes not to discriminate unfairly against any individual on the basis of a conviction or other information revealed. The suitability of a person with a criminal record will vary, depending on the nature of the job and the details and circumstances of any convictions. When dealing with individual disclosures, the Rotunda Ltd DBS procedures must be followed at all times. Rotunda Ltd will not normally employ individuals with prior convictions for sexual or violent offences.

Procedures and guidelines for carrying out DBS checks are made available separately. All related procedures will, as a minimum standard, be in line with the Rotunda Ltd code of conduct for staff, students and volunteers and any guidelines and policies of the Disclosure and Barring Service and the General Data Protection Regulations (2018).

## **4. Training**

Rotunda Ltd requires all appropriate staff and volunteers to undergo training with the aim of ensuring that they understand their Safeguarding



responsibilities and act upon them accordingly. Training will be proportionate to the role using a range of formats which include Canvas e-learning, video conferences, face to face group sessions, and staff conferences. External training will be utilised as appropriate. Rotunda Ltd training resources will be provided and will be updated regularly to take into account topical issues, incidents or changes in legislation.

#### **4.1. Safeguarding Leads:**

- The Safeguarding Lead Designates will update facilitator training at least every two years, and safeguarding and prevent refresher training every year.
- All Designated Safeguarding Officers will complete update training, including the Prevent duty every two years. In addition, they will receive regular updates on Safeguarding and Prevent matters from the Safeguarding Leads designate via e-mails, bulletins and meetings.

#### **4.2. Education Managers, Senior Leaders and Trustees**

All Education Managers/co-ordinators, Senior leaders and trustees will complete appropriate safeguarding training, including bi-annual refresher training, and will ensure currency of knowledge of organisational policies and procedures related to safeguarding and the Prevent duty.

#### **4.3. Tutors:**

All new tutors are required to complete online Rotunda Ltd Safeguarding and Prevent training in the tutor induction (Foundation Learning Online), alongside this staff are given clear guidance on Rotunda Ltd.'s core values, the safeguarding approach and procedures, and safe working practices. Refresher Safeguarding and Prevent training is a requirement at least every 2-3 years.

#### **4.4. Volunteers:**

Volunteers are required to complete Rotunda Ltd induction safeguarding briefing with a member of the Safeguarding team. They will be made aware of how to report incidents and concerns.

#### **4.5. Other staff**

All other staff will receive safeguarding and prevent information and training proportionate to their role.

### **5. Sexual Harassment**

Procedures involving safeguarding students, staff and volunteers from possible sexual harassment are outlined in a separate policy. The policy includes sexual harassment that may occur beyond Rotunda Ltd.'s normal business hours, such as on social media or during other forms of social activity.

### **6. Professional confidentiality and information sharing in relation to safeguarding concerns.**

“The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living



individuals is shared appropriately". (HM Government: Information sharing. July 2018).

A member of staff who receives a disclosure or has a concern should explain clearly to the person about what to expect next and how information could be shared with others who need to know. It is important to seek their agreement, except when to do so would put the child, adult or others at increased risk of significant harm. A degree of professional judgement is involved. There must be a legitimate purpose for sharing information with the overriding consideration being the individual's safety and welfare. Information sharing will be based on "The Seven Golden Rules to Sharing Information" (HM Government: Information sharing. July 2018) and will be "necessary, proportionate, relevant, adequate, accurate, timely and secure".

There is a statutory or professional duty to share relevant information in circumstances where children need to be safeguarded. The Safeguarding Designate will decide whether to refer a case to the relevant Local Authority Adult Board or Children's Social Care. Rotunda Ltd applies the same policy in situations where an adult is at risk of abuse or neglect.

## **7. Whistleblowing**

All staff will be made aware of their duty to raise concerns about the attitude or action of colleagues. The Whistleblowing policy provides guidance to all those who work within the organisation who think they need to "blow the whistle" on alleged bad practice. This may involve the disclosure of information by an employee or worker which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace.

## **8. Management of Safeguarding Allegations against Staff/Volunteers**

A Safeguarding allegation against a member of staff or volunteer is defined as any information that indicates that the member of staff/volunteer is behaving in a way that demonstrates unsuitability for working with children, young people or adults in their present position, or in any capacity. In relation to working with Rotunda Ltd, this includes:

- Behaviour that has harmed, or may have harmed an adult or child.
- Possibly committed a criminal offence against or related to an adult or child.
- Behaviour towards an adult or child that indicates that they may pose a risk of harm to other adults or children.
- Use/possession of sexual material relating to children.
- Use of sexually explicit images depicting violence against human beings (including possession of such images)

- Sexual behaviour involving a vulnerable adult or child.
- Inappropriate professional behaviour including initiating or seeking sexual activity with students.

Harm is defined by the DBS in its widest context and may include:

- Sexual harm
- Physical harm
- Financial harm
- Neglect
- Emotional harm
- Psychological harm
- Verbal harm

Safeguarding allegations about a member of staff or volunteer must be reported immediately to Rotunda Ltd.'s Safeguarding Officer. If the allegation is about the Safeguarding Officer, it must be reported immediately to the Chief Executive Officer. A Case Manager will be appointed and an investigation into the allegation will be carried out in liaison with HR, following HR procedures. The Trustee Safeguarding Lead will be kept informed of the progress and outcomes of the investigation and a case report provided for the Board of Trustees. A barring referral to the DBS will be submitted by the HR Department, if appropriate; a serious incident report to the Charity Commission will be submitted by the Board of Trustees, if appropriate.

## **8. Evaluation**

Safeguarding practice will be evaluated annually by the Safeguarding Lead Officers. This evaluation will inform judgements made in the Self-Assessment report against the Common Inspection Framework Safeguarding criteria. Quality Improvement actions will be identified and implemented, as appropriate.

## **9. Review**

The Safeguarding Lead Officers are responsible for maintenance, regular review and updating of this policy.

## **10. Accessibility**

If any aspect of this policy or its related procedures causes an employee difficulty on account of any disability that they may have, or if they need assistance because English is not their first language, they should raise this issue with their designated safeguarding person who will facilitate the appropriate arrangements.

## 11. Links to other policies and procedures

This policy needs to be read in conjunction with the following policies/procedures: Rotunda policies and procedures:

- Prevent policy.
- Equality, Diversity and Inclusion
- Information sharing Guidance
- Complaint Handling Procedure
- Whistleblowing
- Disciplinary and Grievance
- Data Protection Policy
- Recruitment and Selection/DBS Procedures.
- DBS guidance for Staff

### Other relevant policies and procedures

- Making Barring Referrals to the DBS (<https://www.gov.uk/>)
- Strategy for dealing with Safeguarding issues in Charities.(updated 6th December 2017) <https://www.gov.uk/.../strategy-for-dealing-with-safeguarding-issues-in-charities>
- Keeping Children Safe in Education (updated September 2022) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government July 2018).
- Review of sexual abuse in schools and colleges. Ofsted June 2021 <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>.
- Inspecting safeguarding in early years, education and skills settings...Ofsted September 2019 (updated August 2021)

### Safeguarding online policy

With the development of online programmes using online video, it is important that good online safeguarding practices are implemented that contribute to Rotunda's culture of vigilance for both staff and students. The existing safeguarding and prevent procedures will continue to operate with some additional aspects, as outlined below:

Tutors:

All tutors are required to attend training in the use of online video for teaching before delivering online courses. Guidance on safeguarding in online provision is provided and updated. This includes guidance on maintaining professional boundaries, for example:

When communicating with students via online video:

- Avoid sharing personal information about yourself that you would not normally share in a face to face teaching situation. This includes sharing your personal telephone number.
- When teaching via online video, try to establish a neutral space from which to delivery your teaching session and use the standard Rotunda Ltd background.
- Do not allow students access to your personal internet locations/social networking sites or accept students as 'friends' on your personal Facebook account or agree to be a Facebook 'friend'.

### **Safeguarding procedures**

If concerns are raised about a student or a member of staff receives a safeguarding disclosure during or following an online session, existing safeguarding procedure are followed.

### **Students**

- Tutors should continue to provide information about Rotunda Ltd.'s safeguarding and prevent procedures and the contact numbers for safeguarding staff at the start of the online course.
- Tutors should also discuss the 'online learning protocol' with students at the start of the course.
- Tutors should also discuss the workbook details of student induction including:
  - Safeguarding
  - British values
  - Prevent
  - Safety
  - How to get help?

### **Safety and security**

To ensure the safety and privacy of our online learning is maintained, Rotunda have taken a number of steps to increase security measures on online learning. This includes ensuring all courses have passwords and use the waiting room feature. In addition to this we will be providing unique links to session with passwords only available to the tutor and students on each course. This will mean that people can only join Rotunda Ltd.'s course if they have been provided with the password. We are also working closely with our tutors to ensure they are removing anyone from online sessions if they behave inappropriately as it is vital we continue to safeguard our students and provide a safe space for them to continue learning with Rotunda Ltd. We will

continue to review this on an ongoing basis to ensure we are using the most secure platforms for online learning.

Monitoring:

- Checks will be made during observations of teaching and learning that students know who to contact if they do not feel safe and to check that they are aware of safeguarding and prevent procedures.
- The Learner Voice will ask students 'how safe to you feel?'
- Safeguarding concerns reported by staff delivering online teaching and learning sessions will be reviewed and further actions taken if it is assessed that systems can be improved.
- A further audit of safeguarding and prevent duty policies and procedures will be undertaken to ensure effectiveness for online teaching and learning.

**Rotunda Policy Review Record**

Reviewed by:	Approval date:	Review frequency:	Review date:	Signed:
Maxine Ennis	1 <sup>st</sup> March 2024	Annual	28 <sup>th</sup> February 2025	