

Royal Northern College of Music
Safeguarding Policy
Policy & Procedure
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RNCM
ROYAL NORTHERN
COLLEGE of MUSIC

1. Introduction and Purpose

- 1.1. The Royal Northern College of Music (RNCM) is dedicated to ensuring the safety and wellbeing of all individuals within its community. Through robust policies, procedures, and training, the RNCM is committed to creating a supportive environment that promotes dignity, respect, and protection from harm for all students, staff, and visitors. We prioritise transparency, accountability, and continuous improvement in our safeguarding efforts to uphold the highest standards of care and safeguarding excellence.
- 1.2. This Policy, and the accompanying procedures, outlines the College's approach to meeting this commitment. In meeting our commitment:

We aim to:

- Take a College-wide strategic approach to safeguarding, with oversight of policy and procedure at the Safeguarding Group;
- Create and maintain an environment which is safe for all;
- Promote a culture of listening, taking account of a person's wishes and feelings, and prioritising the safety and welfare of all members of our community in line with good practice and legal requirements;
- Demonstrate our commitment to the Equality Act, safeguarding those within our community with 'Protected Characteristics'.
- Ensure that all employees, students, governors, contractors and visitors understand their roles and responsibilities in respect of safeguarding;
- Provide relevant employees with information and training to support the application of this Policy and associated procedures;
- Ensure that any safeguarding concerns are reported in a timely manner and that appropriate action is taken in line with this Policy and associated procedures;
- Work in partnership with appropriate individuals and agencies to promote safeguarding;
- Provide good quality advice and information about support and services to help protect individuals from abuse and harm, or respond to identified needs. This includes specialist safeguarding responses, general support and targeted support that will help reduce vulnerability and safeguarding incidents; and
- Ensure safe recruitment practices are followed, including carrying out appropriate Disclosure and Barring checks.

We will be guided by the following overarching principles:

- **Prevention:** it is better to take action before harm occurs.
- **Proportionality:** the least intrusive response appropriate to the risk presented.
- **Protection:** support and representation for those in greatest need.
- **Partnership:** endeavour to seek local solutions through working with other services – their communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability:** accountability and transparency in safeguarding practice.
- **Professional Curiosity:** ask questions, with an open mind and challenge respectfully.

2. Scope and definitions

- 2.1. This Policy and associated procedures:

- 2.1.1. Apply to all members of the RNCM community (including students, employees, and governors), visitors and contractors who have a shared role and responsibility in supporting the RNCM to meet its commitment to safeguarding children and adults at risk.
- 2.1.2. Outline the RNCM's approach to safeguarding and promoting the safety and wellbeing of:
 - 2.1.2.1. Children and adults at risk who:
 - Are members of the RNCM community (for example, students, employees and governors);
 - Are visitors to the College (whether in person or via remote technology);
 - Otherwise engage in College related activities or services.
 - 2.1.3. Apply across the range of situations and settings in which the College might engage with children and adults at risk including (amongst others) teaching, research, placements, widening participation activities, recruitment, performance, etc.
 - 2.1.4. Activities that involve under 18 may include examples such as Community Engagement, Children's Opera, JRNCM, Young Artists/ Strings/ Projects. But will also include Programmed events, including Festivals, Consultation/ Advice Lesson, as well as Open Days and Offer Holder Days. This list is not exhaustive but gives an indication of the scope of our activities impacted by safeguarding, *with reference to the Government's Guidance on Safeguarding - After School Clubs, Community Activities and Tuition (October 2020)*.
 - 2.1.5. We also have a statutory responsibility to Adults at Risk under the Care Act (2014), which includes students, over 18. As an Higher Education provider most of the concerns regarding over 18's will be overseen by Wellbeing Services in consultation with the Designated Safeguarding Lead.
- 2.2. The following definitions are used in this Policy and associated procedures:

Child: any person who has not yet reached their 18th birthday.

Adult at risk: any person aged 18 or over, who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and is experiencing, or at risk of abuse or neglect; and
- As a result of those care and support needs, is unable to protect themselves from either the risk of, or experience of abuse and neglect.

Note: Adults at Risk may include over 18's on 'young, junior or engage' activities who have only just turned 18.

Safeguarding Concern: a safeguarding concern is when you are worried about the safety or wellbeing of a child or adult at risk (whether contemporary or historical) because of something which:

- You have observed (seen or heard);
- Has been disclosed to you; and/or you suspect.

- 2.3. Safeguarding concerns may arise in connection with the following categories of abuse, defined within Appendix 1. These lists are non-exhaustive and you should contact the Designated (or Deputy) Safeguarding Lead if you are in any doubt about whether these procedures apply.

3. Roles and Responsibilities

- 3.1 **All staff** should ensure that they read this policy and understand the standards expected of them and their responsibilities. All staff have a responsibility to ensure the safety and welfare of children and adults at risk and to take appropriate steps (including those set out in associated policy and guidance) to ensure that suspicions and allegations of abuse are taken seriously and responded to swiftly and appropriately. Staff must be aware that there is a process for making referrals to Children's/ Adult Social Care. Staff should report any concerns to the Designated Safeguarding Lead or, in the case of an emergency, Children's/ Adult Social Care directly.
- 3.2 **The Board** is responsible for ensuring that the College provides a safe and secure working environment in which to study for children and adults at risk, which includes ensuring that the College's policies and procedures meet statutory requirements and model sector best practice. To assist in this process, the Board appoints a 'nominated governor for safeguarding' to maintain an overview of safeguarding arrangements, primarily via liaison with the 'Designated Safeguarding Lead' (DSL).
- 3.3 **The Executive Committee**, in pursuance of its function as the principal policy-making authority of the RNCM, is responsible for ensuring appropriate supervision for students under the age of 18 and adults at risk, including safeguarding arrangements. The Academic Registrar is the DSL, Prevent Lead and chairs the Safeguarding Committee. Details of the full membership of the Safeguarding Committee are contained within the Terms of Reference.

Any member of staff can make a referral directly to social care or the police if there is a risk of immediate serious harm to a child.

3.4 Designated Safeguarding Lead (DSL)

Emma Hilton Wood, Academic Registrar
Safeguarding@rncm.ac.uk, 0161 9075361

The DSL is the Academic Registrar. The role of the DSL is to take lead responsibility for managing child protection and adults at risk issues and cases. This involves providing advice and support to other staff, making referrals to and liaising with the local authority and working with other agencies as required. Information relating to individual cases is confidential, although some information may be shared with relevant RNCM staff and appropriate agencies where a legal justification exists. The RNCM will, at all times, act in accordance with its obligations in respect of confidentiality and under the Data Protection Act 1998.

- The DSL takes responsibility for the RNCM's safeguarding practice, policy, procedures and professional development. The DSL ensures that the reporting arrangements required by the Board are in place, which include an annual report. The DSL will ensure all updates to legislation and best practice guidance are reflected in the documentation.
- The DSL refers cases of suspected abuse or allegations to the relevant investigating agencies. The DSL also acts as a source of support, advice and expertise within the RNCM when deciding whether to make a referral by liaising

with relevant agencies. The DSL liaises with the Principal to inform them of any issues and on-going investigations and to ensure there is always cover for the DSL role.

- The DSL (and other activity leads) should have appropriate training in order to be able to recognise signs of abuse and know when it is appropriate to make a referral. The DSL must have a working knowledge of the Local Safeguarding Children Partnership, the conduct of a child protection conference and must be able to contribute to these when required (including ensuring that the College's concerns and views are represented and taken into account during a child protection conference).
- The DSL ensures that all appropriate staff receive induction training covering child protection, adults at risk and PREVENT and an understanding of safeguarding issues including the signs of abuse, neglect and radicalisation. Staff should be able to identify the signs and indicators of abuse and should know how to respond effectively when they have concerns or when a disclosure is made to them.
- Ensures records are kept (by the HR Department) of all training (basic and advanced) including dates, provider and staff in attendance.
- The DSL ensures that the College's policies relating to safeguarding and Disclosure and Barring Service Policy, are reviewed appropriately in accordance with the review schedule. All staff and students should have access to the safeguarding policy framework documents and they should be regularly updated in accordance with the review schedule. Regular briefings and updates should be provided at relevant staff meetings to ensure that staff are reminded of their responsibilities.
- The DSL should also ensure that parents of all students under 18 years old receive a copy of the Child Protection Policy which alerts them to the fact that referrals can be made and the College's role in this process.
- The DSL ensures that detailed accurate records are kept securely for any cases where there are safeguarding concerns. Records are confidential and should be kept separately from students' records.
- The DSL take responsibility for decision regarding information sharing in accordance with best practice and GDPR legislation.

3.5 **Deputy Designated Safeguarding Lead (DDSL)**

Paul Hynes, Head of Human Resources
Safeguarding@rncm.ac.uk, 0161 907 5231

The DDSL is the Head of Human Resources of the College. The role of the DDSL is to provide support to the DSL and undertake in their absence the duties as described above. The DDSL will also take lead responsibility for the Training Strategy and Disclosure and Barring Service, ensuring that all relevant staff have appropriate clearance and that all records are up to date and retained. The DDSL will ensure that the DBS is informed if any member of staff has been dismissed or removed from duties due to a safeguarding concern.

Aled Tudor, Head of Junior Programmes
Safeguarding@rncm.ac.uk, 0161 907 XXXX

The DDSL is the Head of Junior Programmes, supports the DSL and can undertake DSL duties in their absence. The DDSL provides specialist advice on safeguarding under 18's.

This role also has line management responsibility for 'Junior Programmes' which is an important area of concern in relation to Child Protection and Safeguarding the under 18's, as the role is line manager to four CPLOs. More generally, the DDSL will support all CPLOs to understand their safeguarding responsibilities and to provide advice and guidance to colleagues across college on safeguarding matters.

3.6 Adults at Risk Liaison Officer (ARLO)

The Head of Student Disability and Wellbeing Services is the first contact for concerns regarding adults who are at risk (Students over 18). AR will act as alternate for this role.

- Receiving and recording information from staff, students, vulnerable adults or parents who have safeguarding concerns;
- Providing detailed, accurate and secure written records of referrals/concerns to the Designated Safeguarding Lead/ Deputy;
- Assessing the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate;
- Acting as a source of support, advice and expertise within the institution where appropriate;
- Consulting initially with the DSL who may contact a statutory for advice. The DSL may then make a formal referral to the Adult Services Department or Police. The ARLO will liaise with the DSL to inform them of any issues concerning safeguarding and to ensure that there is always cover available, via the Health and Wellbeing Hub Team;
- Working with the DSL to ensure that the Student Wellbeing Policy is reviewed, and updated, as required;

3.7 Child Protection Liaison Officers (CPLO)

Each activity which includes under 18's has an Activity Lead, who is also the CPLO. CPLOs will be responsible for dealing with reports of any suspicions or allegations of abuse, in liaison with the DSL and/or DDSL. They will be known as such to staff and volunteers throughout the institution. The role of the CPLO involves:

- Receiving and recording information from staff, children, vulnerable adults or parents who have safeguarding concerns;
- Providing detailed, accurate and secure written records of referrals/concerns to the Designated Safeguarding Lead/ Deputy;
- Assessing the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate;

- Acting as a source of support, advice and expertise within the institution where appropriate;
- Consulting initially with the DSL who may contact a statutory child protection agency (local children's services department, NSPCC) for advice. The DSL may then make a formal referral to the Local Children Services Authority. The CPLOs will liaise with the DSL to inform them of any issues concerning safeguarding and to ensure that there is always cover available for the CPLOs;
- Working with the DSL to ensure that the Child Protection Policy is reviewed, and updated, as required;
- Ensuring that parents/carers of students under 18 years old receive a copy of the Child Protection Policy.

3.8 Role titles, with particular responsibilities include:

- Academic Registrar – Emma Hilton Wood - Designated safeguarding Lead and PREVENT Lead.
- Deputy Registrar – Adam Croucher – Deputy PREVENT Lead
- Head of HR – Paul Hynes - Deputy Designated Safeguarding Lead, responsible for Safe Recruitment, training and DBS Compliance.
- Head of Student Disability – Jane Gray - ARLO for student wellbeing/ safeguarding issues (over 18), Academic Registrar or Deputy Registrar is the alternative.
- Head of Junior Programmes – Aled Tudor – Deputy Designated Safeguarding Lead responsible for Junior Programmes and general advice on safeguarding under 18's.
- Child Protection Liaison Officers: All under 18 Activity Leads (Rachael Jones, Tosin Akindele, Sarah Crooks, Eugene Monteith, Fiona Stuart, Andy Stott, Ashleigh Rice, Sam Rodwell, Matthew Whitham, Adam Swayne).

3.9 Concerns relating to the conduct of the DSL or DDSLs should be raised immediately with the Principal.

4. **Monitoring Compliance**

- 4.1. Compliance with this Policy and associated procedures will be monitored by the Safeguarding Committee and reported up to the Board of Governors via Executive Committee.

5. **Freedom of Speech, Academic Freedom and Safeguarding**

- 5.1 This Procedure shall be interpreted and applied consistently with the Royal Northern College of Music's statutory duties under the Freedom of Speech (Higher Education) Act 2023, and with the College's commitment to academic freedom, artistic freedom, and lawful freedom of expression.
- 5.2 Nothing in this Policy is intended to restrict, discourage, or sanction lawful freedom of speech, academic inquiry, artistic expression, or lawful participation in public debate. This Policy is concerned solely with the safeguarding and welfare of children and young people, and with the management of conduct and risk where there is a safeguarding concern.

- 5.3 Safeguarding responsibilities operate in parallel with, and do not override, lawful freedom of expression. The existence of controversial, unpopular, or critical speech, teaching, research, or artistic activity does not in itself constitute a safeguarding concern and shall not trigger action under this Policy unless there is a genuine risk of harm, abuse, neglect, or exploitation of a child.
- 5.4 Decisions taken under this Procedure shall be based on evidence of safeguarding risk, in accordance with law and statutory guidance, and shall not be influenced by reputational considerations, public perception, disagreement with lawful views, or the lawful exercise of academic or artistic judgment.

6. Supporting Policies and Procedures

- Recruitment and Selection Policy
- Code of Practice (Working with Under 18s)
- Handling Safeguarding Allegations Against Staff
- Child Protection Procedure and Staff Code of Conduct
- Student Wellbeing Policy (in draft)
- Work Experience (School Children) Policy
- Disclosure and Barring Policy
- Procedure for Handling Allegations of Sexual Misconduct
- Online Safety Policy Statement
- Photography and Filming Policy Statement
- Physical Contact Between College Staff and Students
- Relationships Between College Staff and Students
- Public Interest Disclosure (Whistle Blowing)

ROYAL NORTHERN COLLEGE OF MUSIC

POLICY APPROVAL/REVIEW PROCESS

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AMENDMENTS SINCE DRAFT

ISSUE No	PAGE	DETAILS	DATE	ISSUED BY
1		First draft	June 2024	Emma Hilton-Wood
2		Final – ready for publication	27 November 2024	Emma Hilton-Wood
3		Minor updates in accordance with UNIAC internal Audit	May 2025	Emma Hilton-Wood
4		Minor updates, relating to role changes and responsibilities clarity.	May 2026	Emma Hilton-Wood

Approvals

This document requires the following approvals.

Name/Committee	Date	Version
Executive Committee	July 2024	1
Board of Governors	27 November 2024	2
Executive Committee	June 2025	3
Board of Governors	July 2025	3
Executive Committee	June 2026	4
Board of Governors	July 2026	4

Appendix 1: Definitions of Abuse

The definition of abuse for the purpose of this policy (which is taken from *Keeping Children Safe in Education* (HM Government, 2023) includes:

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child 11 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it.

Neglect

Involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation (Revised Definition 2025):

In accordance with updated UK safeguarding guidance, our institution exploitation as a distinct form of harm alongside abuse and neglect. Exploitation involves the or coercive use of a child or vulnerable person for another's gain, which may be criminal, financial, or otherwise.

Forms of Exploitation include:

- **Child Sexual Exploitation (CSE):** Involving coercion, manipulation, or deception for sexual purposes (see detail below)
- **Child Criminal Exploitation (CCE):** Including involvement in criminal activities such as county lines, often under threat or coercion (see detail below).
- **Modern Slavery and Human Trafficking:** Where individuals are forced into labour, services, or criminal acts.
- **Online Exploitation:** Including grooming, sextortion, and manipulation via digital platforms.
- **Financial Exploitation:** Where children or vulnerable individuals are used for monetary gain, including fraud or theft.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

Child on Child abuse

All staff should be aware that children can abuse other children (often referred to as child on child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence⁹ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

Female Genital Mutilation (FGM)

All staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM).

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, all staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Immediate action should be taken to follow their school or college's child protection policy, and by speaking to the DSL or a deputy.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The above is a non-exhaustive list and there may be other forms of abuse, or examples of abuse, which require action under this policy.

Appendix 2: Guidance on Safeguarding Record Keeping

Introduction

Record keeping is a fundamental aspect of safeguarding at the Royal Northern College of Music (RNCM). Ensuring accurate, timely, and secure documentation is essential for protecting students and vulnerable individuals from harm. This guidance document outlines best practices, legal requirements, and procedures for staff involved in safeguarding record keeping at RNCM.

Importance of Record Keeping in Safeguarding

Effective record keeping plays a crucial role in safeguarding efforts for several reasons:

1. **Early Identification of Risks:** Keeping detailed records enables staff to identify patterns of concern and take early action.
2. **Continuity of Care:** Proper documentation ensures that important information is available for those involved in safeguarding interventions.
3. **Legal and Regulatory Compliance:** RNCM staff are required to comply with safeguarding laws and regulations, which necessitate proper record keeping.
4. **Accountability and Transparency:** Safeguarding records ensure that decisions and actions taken are documented and traceable.
5. **Facilitating Multi-Agency Collaboration:** Safeguarding often involves external agencies, and clear records support effective information sharing.
6. **Protection for Staff and the Institution:** Proper documentation provides evidence of due diligence and appropriate actions taken by staff.

Where Records are Maintained

Records relating to safeguarding concerns at RNCM are maintained in a secure, designated safeguarding system within Teams, all appropriate staff have access to secure files within the area and ensures restricted access to authorised personnel only. Paper records in relation to safeguarding are not compliant with RNCM procedures, while digital records are stored in password-protected systems, compliant with data protection laws.

Information Security

To protect sensitive safeguarding information, RNCM follows strict security protocols:

1. **Access Control:** Only designated safeguarding officers and relevant senior staff have access to safeguarding records.
2. **Password Protection:** Digital records require multi-factor authentication for access.
3. **Regular Security Audits:** Teams, which is used to maintain safeguarding records undergoes routine audits to ensure compliance with data protection laws.
4. **Data Minimisation:** Only necessary information is recorded to limit data exposure.
5. **Confidentiality:** Staff handling safeguarding records must adhere to confidentiality policies, keep up to date with GDPR and Cyber Security training.

Period of Retention

Safeguarding records are retained in accordance with RNCM's policies and GDPR requirements:

- **Child Safeguarding Records:** Retained in accordance with RNCM student record retention (current academic Year +6 years).

- **Adult Safeguarding Records:** Retained in accordance with RNCM student record retention (current academic Year +6 years).
- **Serious Cases:** Where legal proceedings or investigations occur, records may be retained as required by legal authorities.
- **Secure Disposal:** Upon expiry of retention periods, records are permanently deleted (digital copies).

Access and Information Sharing Policies

Access to safeguarding records is strictly controlled to ensure confidentiality and compliance with legal frameworks. RNCM follows these principles:

1. **Internal Access:**
 - Only designated safeguarding officers, senior safeguarding leads, and authorised individuals have access.
 - Requests for information via DSL.
2. **External Sharing:**
 - Safeguarding information is shared with external agencies (e.g., social services, police) only when necessary to protect individuals from harm.
 - Information is shared on a need-to-know basis and in compliance with data protection legislation.
 - All disclosures to external agencies are documented, including justification and recipient details.
3. **Parental and Guardian Access:**
 - Parents or guardians may request information about safeguarding records for minors, subject to safeguarding considerations.
 - RNCM ensures that information sharing does not place the individual at further risk.

Subject Access Requests

Under the UK GDPR and Data Protection Act, individuals have the right to request access to their personal data, including safeguarding records. RNCM's subject access request process applies.

Best Practices for RNCM Staff

To support effective safeguarding record keeping, RNCM staff should:

1. **Follow RNCM's Safeguarding Policies:** Adhere to the institution's official safeguarding procedures.
2. **Undergo Regular Training:** Stay updated on best practices and legal requirements for safeguarding documentation.
3. **Utilise Secure Digital Systems:** Use Teams.
4. **Regularly Review and Audit Records:** Ensure records are accurate, complete, and up to date and remember to close/ delete files when appropriate.
5. **Report Concerns Promptly:** Use designated channels to document and report safeguarding issues.
6. **Work Collaboratively:** Communicate effectively with safeguarding leads and relevant agencies.