

Safeguarding Policy

January 2026, Rhein-Sieg Institute of Arts & Design GmbH

Content

1. Introduction.....	4
1.1 Purpose and commitment.....	4
1.2 Scope	4
1.3 Governance and roles (high level).....	5
1.4 Principles	5
1.5 Related policies	5
2. Legal and regulatory framework (Germany)	6
2.1 General approach	6
2.2 Data protection and confidentiality	6
2.3 Child protection (key German reference points)	7
2.4 Contractual/partner obligations.....	7
2.5 NRW crisis management guidance (local best practice)	7
3. Protection of children, young people and vulnerable adults.....	8
3.1 Groups covered	8
3.2 Contexts in which heightened safeguarding risk may arise	8
3.3 Preventative measures.....	8
3.4 Suitability and checks for roles involving minors (as applicable).....	9
3.5 Expectations of staff, students and partners	9
4. Safeguarding for all students (including adults).....	10
4.1 Statement of intent	10
4.2 Adult students and “adults at risk”	10
4.3 Power imbalance and professional boundaries	10
5. Scope of concerns and indicators.....	11
5.1 What constitutes a safeguarding concern.....	11
5.2 Non-exhaustive categories	11
5.3 Indicators (guidance only)	11
6. Roles, responsibilities and governance	12
6.1 Safeguarding governance structure	12
6.2 Safeguarding Committee/Board	12
6.3 Lead Safeguarding Officer (LSO).....	12
6.4 Deputy LSO	13
6.5 Designated Safeguarding Officers (DSOs) / Safeguarding Contacts.....	13
6.6 Responsibilities of all staff, contractors and students	13
6.7 Whistleblowing / protection from detriment	13
7. Reporting and response procedure (Centralised Safeguarding Reporting)	14

7.1 Reporting routes.....	14
7.2 What should be reported	14
7.3 Immediate response by the first recipient (staff or student).....	14
7.4 Triage, risk assessment and action planning	15
7.5 External escalation (emergency services / police / specialist agencies)	16
7.6 Allegations against RSIAD staff, contractors or partners	16
7.7 Case closure and learning	16
8. Confidentiality, information sharing and record keeping	17
8.1 Confidentiality principles.....	17
8.2 Data protection and lawful processing	17
8.3 Information sharing without consent	17
8.4 Record keeping.....	18
9. Training, awareness and prevention	18
9.1 Training requirements.....	18
9.2 Awareness and accessibility	18
9.3 Professional boundaries and safer working practice	19
10. Placements, external activities and partner assurance.....	19
10.1 General principles.....	19
10.2 Risk assessment and approvals	19
10.3 Partner safeguarding assurance.....	20
11. Monitoring, quality assurance and policy review	20
11.1 Monitoring and reporting.....	20
11.2 Quality assurance	21
11.3 Policy review.....	21

1. Introduction

1.1 Purpose and commitment

1.1.1 , Rhein-Sieg Institute of Arts & Design gGmbH is committed to providing a safe, respectful and supportive learning and working environment. We recognise our responsibility to safeguard and promote the welfare of all members of our community and those who engage with our activities, whether on campus, off-site, during placements, or online.

1.1.2 This Safeguarding Policy sets out the principles, governance arrangements, and procedures for responding to safeguarding concerns. It aims to ensure that:

- safeguarding risks are identified and mitigated proactively;
- concerns are recognised early and reported promptly;
- appropriate support is provided to individuals who may be at risk or have experienced harm;
- information is managed responsibly and lawfully; and
- serious concerns are escalated to relevant external agencies where required.

1.1.3 Safeguarding is understood broadly. It includes (but is not limited to) protection from:

- physical, sexual, emotional/psychological abuse and neglect;
- harassment, bullying, discrimination, hate incidents and stalking (including online);
- exploitation (including coercion and abuse of power, and trafficking/forced labour risks);
- domestic abuse and controlling behaviour;
- serious mental health crises and self-harm risk where welfare and safety are at stake; and
- other circumstances that may place an individual at risk of significant harm.

1.2 Scope

1.2.1 This Policy applies to all safeguarding concerns arising in connection with Rhein-Sieg Institute of Arts & Design gGmbH, including activity occurring:

- on institutional premises or at institutional events;
- during teaching, tutorials, assessment, supervision, mentoring or student support;
- during work-based learning, placements, field trips, study visits, outreach and recruitment activity;
- in digital environments (online learning platforms, video calls, messaging, social media where connected to institutional activity); and
- in partnerships, where the institution's staff/students are involved, or where the institution has a duty of care.

1.2.2 This Policy applies to:

- all staff (including leaders/managers), visiting lecturers, contractors, volunteers and agency workers;
- all students (including applicants and prospective students engaged in institutional activity);
- visitors and guests; and
- partner organisations where activities are undertaken on behalf of, or in association with, Rhein-Sieg Institute of Arts & Design gGmbH.

1.3 Governance and roles (high level)

1.3.1 Rhein-Sieg Institute of Arts & Design gGmbH will maintain:

- a Safeguarding Committee/Board (strategic oversight, annual review, trend monitoring, assurance); and
- a Lead Safeguarding Officer (LSO) (operational lead, case coordination, advice, training oversight).

1.3.2 A network of Designated Safeguarding Officers (DSOs) will act as accessible first points of contact and will liaise with the LSO.

1.3.3 The institution will ensure that safeguarding responsibilities are reflected in relevant job descriptions, induction processes, training requirements, and partner/placement arrangements.

1.4 Principles

1.4.1 Our safeguarding response is guided by:

- **Safety first:** immediate safety overrides procedural steps.
- **Early reporting:** concerns should be reported even where information is incomplete or uncertain.
- **Respect and dignity:** a trauma-informed, non-judgemental approach.
- **Proportionality:** actions appropriate to the risk and context.
- **Confidentiality and data minimisation:** information is shared strictly on a need-to-know basis.
- **Fairness:** careful handling of allegations; avoidance of premature conclusions.
- **Continuous improvement:** learning from cases to strengthen prevention and practice.

1.5 Related policies

1.5.1 This Policy should be read alongside:

- Code of Conduct / Student and Staff Behaviour Standards
- Harassment and Sexual Misconduct Policy (or equivalent)
- Equality, Diversity and Inclusion Policy / Anti-Discrimination Policy
- Complaints and Disciplinary Procedures

- Data Protection and Records Management Policy
- Online Safety / IT and Acceptable Use Policy
- Placement / Field Trip / External Activities Procedures
- Health & Safety and Risk Assessment Framework

2. Legal and regulatory framework (Germany)

2.1 General approach

2.1.1 Rhein-Sieg Institute of Arts & Design gGmbH operates within the legal framework of the Federal Republic of Germany. This Policy is designed to be compatible with safeguarding expectations in an international partnership context while ensuring compliance with applicable German law.

2.1.2 Safeguarding cases are handled in a manner consistent with:

- duty of care and organisational responsibilities typical of educational providers;
- data protection requirements; and
- child protection and welfare-protection mechanisms where applicable.

2.2 Data protection and confidentiality

2.2.1 Safeguarding often involves sensitive information. Rhein-Sieg Institute of Arts & Design gGmbH will process personal data in line with the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG), applying:

- lawful basis for processing;
- data minimisation and purpose limitation;
- secure storage and controlled access; and
- retention and deletion in accordance with the institution's records policy.

2.2.2 Information will be shared internally strictly on a need-to-know basis. Where possible and appropriate, the informed consent of the individual will be sought before sharing information externally. However, information may be shared without consent where:

- there is an immediate or significant risk to the individual or others;
- a child/young person may be at risk (child protection considerations); or
- disclosure is otherwise required or justified under applicable law.

2.3 Child protection (key German reference points)

2.3.1 Where activities involve children and young people, the institution's procedures will reflect the principles of German child protection frameworks, including:

- SGB VIII (Social Code Book VIII) provisions relevant to child welfare and protection, including coordination with competent youth welfare services where a serious risk to a child's welfare is suspected.
- Requirements commonly applied in Germany regarding suitability checks for individuals working with minors in certain contexts (e.g., enhanced certificate of good conduct / "erweitertes Führungszeugnis" and safeguarding suitability standards where applicable).

2.3.2 The institution will maintain clear internal thresholds and escalation routes to ensure timely decisions about involving external agencies (e.g., Youth Welfare Office / Jugendamt, police, emergency services), based on the nature and immediacy of the risk.

2.4 Contractual/partner obligations

2.4.1 For placements, external teaching, outreach activities, and partner-delivered components, Rhein-Sieg Institute of Arts & Design gGmbH will ensure that:

- safeguarding expectations are reflected in written agreements;
- partner organisations have appropriate safeguarding and reporting arrangements; and
- risk assessment and supervision arrangements are documented before activities commence.

2.5 NRW crisis management guidance (local best practice)

2.5.1. Rhein-Sieg Institute of Arts & Design gGmbH aligns its emergency response and crisis intervention approach with recognised local guidance in North Rhine-Westphalia (NRW), in particular the NRW school crisis-management framework and the *Notfallordner "Hinsehen und Handeln"* (including the *Krisenpräventionshandbuch*). This provides structured recommendations for prevention and response in crisis situations. Rhein-Sieg Institute of Arts & Design gGmbH uses these principles as a reference point (where appropriate to a higher education context) alongside its internal safeguarding procedures.

3. Protection of children, young people and vulnerable adults

3.1 Groups covered

3.1.1 This Policy applies to safeguarding concerns relating to:

- Children and young people: individuals under the age of 18.
- Vulnerable adults / adults at risk (functional definition for institutional purposes): adults who, due to their personal circumstances, may be unable to protect themselves from harm, abuse or exploitation, or may be at increased risk. This may include (non-exhaustively): disability, serious physical illness, acute mental health crisis, significant dependency relationships, severe social isolation, or other factors materially limiting self-protection.

3.1.2 Vulnerability may be situational (temporary) or long-term. The institution will avoid assumptions and will base decisions on observed risk indicators and available information.

3.2 Contexts in which heightened safeguarding risk may arise

3.2.1 Increased safeguarding risk may arise in particular during:

- admissions/recruitment events, outreach, school engagement, workshops involving under-18s;
- one-to-one teaching, supervision, mentoring or pastoral support (especially where power imbalance exists);
- placements, work-based learning, internships and external projects;
- residential or travel-based activities (field trips, study visits, exhibitions);
- online learning environments (private messaging, video sessions, digital submissions);
- events involving external guests, third-party service providers or shared premises.

3.3 Preventative measures

3.3.1 Rhein-Sieg Institute of Arts & Design gGmbH will implement proportionate preventative measures, which may include:

- clear behavioural standards and professional boundaries for staff and students;
- training for staff and DSOs in recognising and responding to concerns;
- risk assessment for activities involving under-18s or vulnerable adults;
- supervision arrangements (e.g., avoiding isolated one-to-one situations with minors where possible; ensuring appropriate visibility and safeguarding controls);
- safe online practice (approved platforms, guidance on private messaging, recording rules where relevant);
- partner/placement due diligence and written safeguarding expectations.

3.4 Suitability and checks for roles involving minors (as applicable)

3.4.1 Where roles or activities involve direct contact with children/young people or significant access to minors, Rhein-Sieg Institute of Arts & Design gGmbH will determine and document whether suitability checks are required, which may include:

- requesting an enhanced certificate of good conduct (“erweitertes Führungszeugnis”) where legally appropriate and proportionate;
- obtaining declarations and references consistent with the role and risk level;
- ensuring contractors/partners provide assurance of comparable safeguarding controls; and
- keeping records of checks in a secure, privacy-respecting manner (recording the minimum necessary information).

3.4.2 The institution will apply a risk-based approach: checks and controls will be proportionate to the nature, frequency and intensity of contact.

3.5 Expectations of staff, students and partners

3.5.1 All staff and those working on behalf of the institution must:

- be familiar with this Policy and associated procedures;
- take all safeguarding concerns seriously;
- report concerns promptly through the designated channels;
- maintain appropriate professional boundaries; and
- cooperate with safeguarding enquiries and risk management measures.

3.5.2 Students are expected to:

- treat others with respect and comply with behavioural standards;
- report concerns they become aware of; and
- engage with support measures where a safeguarding concern is raised.

3.5.3 Partners hosting placements or joint activities must:

- nominate a safeguarding contact point;
- provide evidence of relevant safeguarding procedures where needed; and
- cooperate with reporting and escalation arrangements agreed with Rhein-Sieg Institute of Arts & Design gGmbH

4. Safeguarding for all students (including adults)

4.1 Statement of intent

4.1.1 Rhein-Sieg Institute of Arts & Design gGmbH recognises that safeguarding is relevant for all students, including adults, because significant harm can arise from harassment, abuse, exploitation, coercion, discrimination, online harm, or serious mental health and welfare crises.

4.1.2 Rhein-Sieg Institute of Arts & Design gGmbH will take reasonable and proportionate steps to:

- reduce foreseeable safeguarding risks;
- provide accessible routes to raise concerns;
- respond in a supportive and timely manner; and
- implement protective and supportive measures while appropriate processes are followed.

4.2 Adult students and “adults at risk”

4.2.1 The majority (or most probably all) of Rhein-Sieg Institute of Arts & Design gGmbH’s learners are adults. Rhein-Sieg Institute of Arts & Design gGmbH will provide safeguarding support to adult students, and will apply a functional “adult at risk” lens where circumstances indicate reduced ability to self-protect or heightened vulnerability (temporary or long-term).

4.2.2 Rhein-Sieg Institute of Arts & Design gGmbH recognises that vulnerability can be situational (e.g., acute crisis, isolation, dependency relationships, financial exploitation, domestic abuse, coercive control, substance misuse, severe stress).

4.3 Power imbalance and professional boundaries

4.3.1 Rhein-Sieg Institute of Arts & Design gGmbH acknowledges that safeguarding risk can be increased where power imbalances exist (e.g., assessment, supervision, mentoring, placements, gatekeeping roles).

4.3.2 Rhein-Sieg Institute of Arts & Design gGmbH will maintain clear expectations regarding:

- professional boundaries and respectful conduct;
- appropriate staff–student communication (including online);
- avoidance of abuse of position, coercion, and conflicts of interest; and
- fair and safe learning environments.

5. Scope of concerns and indicators

5.1 What constitutes a safeguarding concern

5.1.1 A safeguarding concern includes any information, disclosure, observation or allegation indicating that a person:

- is experiencing, has experienced, or is at risk of experiencing significant harm; or
- may be subject to abuse, exploitation, coercion, harassment, discrimination or violence; or
- may present a risk of significant harm to others within Rhein-Sieg Institute of Arts & Design gGmbH-related contexts.

5.2 Non-exhaustive categories

5.2.1 Concerns may include (non-exhaustively):

- physical abuse, sexual abuse, emotional/psychological abuse, neglect;
- sexual harassment, sexual misconduct, coercion, unwanted sexual attention;
- bullying, intimidation, stalking, hate incidents and discrimination;
- domestic abuse and coercive control;
- exploitation (including abuse of power, financial exploitation, labour exploitation);
- online harm (harassment, doxxing, threats, image-based abuse);
- serious mental health crises, self-harm risk or suicidal ideation where welfare and safety are at stake;
- safeguarding-related concerns arising in placements, trips, or partner settings.

5.3 Indicators (guidance only)

5.3.1 Indicators may include sudden changes in behaviour, repeated absences, distress, fear of a person or situation, controlling relationships, threats, isolation, unexplained injuries, or disclosure by the person or third parties.

5.3.2 Rhein-Sieg Institute of Arts & Design gGmbH recognises that indicators are not proof. They should trigger curiosity, support, and appropriate reporting, not investigation by untrained staff.

6. Roles, responsibilities and governance

6.1 Safeguarding governance structure

6.1.1 Rhein-Sieg Institute of Arts & Design gGmbH will maintain a safeguarding governance structure to ensure accountability, consistent practice and oversight.

6.1.2 Rhein-Sieg Institute of Arts & Design gGmbH will appoint:

- a Safeguarding Committee/Board (strategic oversight); and
- a Lead Safeguarding Officer (LSO) (operational lead), supported by a Deputy LSO.

6.1.3 Rhein-Sieg Institute of Arts & Design gGmbH will also appoint one or more Designated Safeguarding Officers (DSOs) (or “Safeguarding Contacts”) to ensure accessibility for students and staff.

6.2 Safeguarding Committee/Board

6.2.1 The Committee/Board will:

- approve the safeguarding framework and review it regularly (at least every 2–3 years or sooner if required);
- receive anonymised trend reporting and learning points;
- oversee training compliance and resourcing;
- review placement/outreach safeguarding assurance where relevant; and
- ensure cross-policy alignment (disciplinary, EDI, harassment/sexual misconduct, data protection, H&S).

6.3 Lead Safeguarding Officer (LSO)

6.3.1 The LSO is responsible for:

- providing expert advice to staff and students on safeguarding matters;
- coordinating Rhein-Sieg Institute of Arts & Design gGmbH’s response to safeguarding reports (triage, risk assessment, action planning);
- maintaining secure safeguarding case records and ensuring data minimisation;
- liaising with senior management and relevant external agencies when escalation is required (e.g., emergency services, police, youth welfare services where applicable);
- supporting DSOs and ensuring consistent practice;
- overseeing safeguarding training, guidance and prevention activities.

6.3.2 The LSO must have the authority to recommend immediate protective measures where required for safety (see Procedure section).

6.4 Deputy LSO

6.4.1 The Deputy LSO will:

- act in the LSO's absence; and
- lead on cases where conflicts of interest require the LSO to step aside.

6.5 Designated Safeguarding Officers (DSOs) / Safeguarding Contacts

6.5.1 DSOs will:

- act as accessible first points of contact;
- receive disclosures and concerns and ensure they are passed promptly into Rhein-Sieg Institute of Arts & Design gGmbH's central reporting process;
- provide initial support and guidance on next steps;
- avoid "investigating" and focus on safety, documentation and referral.

6.6 Responsibilities of all staff, contractors and students

6.6.1 All staff and individuals working on behalf of Rhein-Sieg Institute of Arts & Design gGmbH must:

- complete required safeguarding induction/training;
- follow professional boundaries and behavioural expectations;
- report safeguarding concerns promptly through Rhein-Sieg Institute of Arts & Design gGmbH's reporting routes; and
- cooperate with safeguarding risk-management measures.

6.6.2 Students are expected to:

- behave respectfully and comply with Rhein-Sieg Institute of Arts & Design gGmbH standards;
- raise concerns about safety and wellbeing when they arise; and
- engage with supportive and protective measures where appropriate.

6.7 Whistleblowing / protection from detriment

6.7.1 Rhein-Sieg Institute of Arts & Design gGmbH encourages good-faith reporting. No person should suffer detriment for raising a safeguarding concern in good faith, even if it later proves unfounded.

7. Reporting and response procedure (Centralised Safeguarding Reporting)

7.1 Reporting routes

7.1.1 Rhein-Sieg Institute of Arts & Design gGmbH operates a centralised safeguarding reporting process to ensure concerns are captured consistently, assessed appropriately, and responded to in a timely manner.

7.1.2 Safeguarding concerns can be reported via:

- Safeguarding email (central inbox): [safeguarding@rsak.de]
- Telephone: [+49 n.n.]
- Designated Safeguarding Officers (DSOs): [n.n.]
- Lead Safeguarding Officer (LSO): [n.n.]
- In person: via DSOs/LSO by appointment or during published office hours

7.1.3 Emergency / immediate danger: If there is an immediate threat to life or serious harm, individuals must call 112 (ambulance/fire) or 110 (police) first, and then notify Rhein-Sieg Institute of Arts & Design gGmbH as soon as safely possible.

7.1.4 Anonymous reporting: Rhein-Sieg Institute of Arts & Design gGmbH will accept anonymous concerns where possible; however, anonymity may limit Rhein-Sieg Institute of Arts & Design gGmbH's ability to investigate or provide support.

7.2 What should be reported

7.2.1 Any member of Rhein-Sieg Institute of Arts & Design gGmbH's community who:

- receives a disclosure,
- witnesses concerning behaviour,
- becomes aware of information suggesting risk, or
- has a reasonable concern that a person may be at risk of significant harm should report it promptly through the routes above.

7.2.2 It is acceptable to report even if the information is incomplete. The safeguarding team will assess and determine next steps.

7.3 Immediate response by the first recipient (staff or student)

7.3.1 If someone discloses harm or risk to you, you should:

- Listen calmly and take the person seriously.

- Do not promise secrecy. Explain you may need to share information with the safeguarding team to protect them or others.
- Avoid detailed questioning or attempting to investigate. Ask only the minimum necessary questions to understand immediate safety.
- Consider immediate safety needs (medical attention, safe space, trusted person present).
- Record what was said/observed as soon as possible, including dates/times and relevant facts (use direct quotes where helpful).
- Report promptly to the central safeguarding process.

7.4 Triage, risk assessment and action planning

7.4.1 On receipt, the LSO (or Deputy/DSO as delegated) will conduct an initial triage and determine the appropriate response. This will consider:

- severity and immediacy of risk (low / medium / high / critical),
- whether the concern involves a child/young person (rare for RSIAD, but possible),
- whether the concern involves a potential “adult at risk” situation,
- whether the allegation involves Rhein-Sieg Institute of Arts & Design gGmbH staff/contractors or occurred in Rhein-Sieg Institute of Arts & Design gGmbH-related activity,
- whether protective measures are needed to prevent contact or further harm,
- whether external agency involvement may be required.

7.4.2 Rhein-Sieg Institute of Arts & Design gGmbH will adopt proportionate supportive and protective measures, which may include:

- wellbeing support and signposting to specialist services,
- adjustments to teaching/assessment arrangements,
- no-contact arrangements / managed separation on campus,
- placement changes or supervision adjustments,
- temporary restrictions on access to facilities where necessary for safety,
- referral to disciplinary procedures where relevant.

7.4.3 Rhein-Sieg Institute of Arts & Design gGmbH will document a Safeguarding Action Plan for medium/high risk cases, setting out:

- agreed protective/support measures,
- responsible persons and timelines,
- review dates, and
- escalation triggers.

7.5 External escalation (emergency services / police / specialist agencies)

7.5.1 Rhein-Sieg Institute of Arts & Design gGmbH may involve external agencies where:

- there is an immediate risk to life or serious harm (110/112);
- a criminal offence may have occurred and reporting is required or strongly indicated;
- a child/young person may be at risk (youth welfare services / competent authorities);
- safeguarding cannot be managed effectively through internal measures alone.

7.5.2 Where possible and safe, Rhein-Sieg Institute of Arts & Design gGmbH will inform the individual before external escalation. Rhein-Sieg Institute of Arts & Design gGmbH may share information without consent where there is a compelling safeguarding justification (see Section 8).

7.6 Allegations against RSIAD staff, contractors or partners

7.6.1 Allegations involving Rhein-Sieg Institute of Arts & Design gGmbH staff/contractors/visiting lecturers must be escalated immediately to the LSO and [Managing Director / HR lead].

7.6.2 Rhein-Sieg Institute of Arts & Design gGmbH will implement appropriate interim safety measures (risk-based), which may include:

- reassigning duties,
- limiting contact with students,
- enhanced supervision,
- temporary suspension from specific activities (without prejudging outcomes).

7.6.3 Any HR/disciplinary process will be coordinated with safeguarding considerations, and (where applicable) external investigations.

7.7 Case closure and learning

7.7.1 A case will be closed when:

- risks are reduced to an acceptable level,
- support measures are in place and stable, and/or
- Rhein-Sieg Institute of Arts & Design gGmbH has transferred responsibility appropriately (e.g., external agencies) and has no further reasonable action.

7.7.2 Rhein-Sieg Institute of Arts & Design gGmbH will capture learning points (anonymised) to improve prevention, training and processes.

8. Confidentiality, information sharing and record keeping

8.1 Confidentiality principles

8.1.1 Rhein-Sieg Institute of Arts & Design gGmbH will treat safeguarding information as confidential and share it internally only on a strict need-to-know basis.

8.1.2 Individuals reporting concerns may request confidentiality. Rhein-Sieg Institute of Arts & Design gGmbH will respect this as far as possible, but cannot guarantee it where:

- there is a serious risk to the individual or others,
- external escalation is required, or
- legal obligations apply.

8.2 Data protection and lawful processing

8.2.1 Rhein-Sieg Institute of Arts & Design gGmbH will process personal data relating to safeguarding in accordance with GDPR and the German Federal Data Protection Act (BDSG), applying:

- lawful basis and transparency (as appropriate),
- data minimisation and accuracy,
- secure storage with access controls,
- retention and deletion consistent with records policy.

8.2.2 Special category data (e.g., health, sexual life, alleged offences) will be handled with enhanced care and only where necessary for safeguarding purposes.

8.3 Information sharing without consent

8.3.1 Rhein-Sieg Institute of Arts & Design gGmbH may share information without consent where it is necessary to protect the vital interests of the individual or others, to prevent serious harm, or where there is another compelling safeguarding justification consistent with applicable law.

8.3.2 Rhein-Sieg Institute of Arts & Design gGmbH will document the rationale for any such disclosure, including what was shared, with whom, and why.

8.4 Record keeping

8.4.1 Rhein-Sieg Institute of Arts & Design gGmbH will maintain a secure safeguarding case record for relevant concerns, including:

- the initial report,
- triage/risk assessment notes,
- actions taken and decisions made,
- communications and referrals, and
- closure rationale and learning points.

8.4.2 Records will be factual, clear, and proportionate. Access will be restricted to the LSO/Deputy and authorised DSOs as required.

8.4.3 Retention periods will be set out in Rhein-Sieg Institute of Arts & Design gGmbH's records management framework. Records will be deleted or anonymised when no longer necessary.

9. Training, awareness and prevention

9.1 Training requirements

9.1.1 Rhein-Sieg Institute of Arts & Design gGmbH will provide safeguarding training to ensure staff and relevant partners can recognise and respond appropriately to concerns. Training will include:

- recognising safeguarding indicators and responding to disclosures,
- professional boundaries and power imbalance,
- reporting routes and documentation,
- online safety considerations,
- information sharing and confidentiality principles,
- responding to allegations involving staff/contractors.

9.1.2 Training will be delivered:

- as part of induction for new staff/visiting lecturers/contractors and
- via refresher training at least every 24 months.

9.1.3 DSOs/LSO will receive enhanced training relevant to triage, risk assessment, case coordination and referral.

9.2 Awareness and accessibility

9.2.1 Rhein-Sieg Institute of Arts & Design gGmbH will ensure that safeguarding reporting routes and support options are communicated clearly to students and staff, including via:

- student handbook / intranet / learning platform,
- orientation sessions,
- posters/signage (where applicable),
- staff briefings and guidance.

9.3 Professional boundaries and safer working practice

9.3.1 Rhein-Sieg Institute of Arts & Design gGmbH expects staff and visiting lecturers to:

- maintain professional boundaries,
- avoid private or inappropriate communications with students,
- use institutional channels for student communication where possible,
- avoid one-to-one situations that create unnecessary risk (use visibility, open doors, scheduling, and documentation),
- report boundary concerns or inappropriate behaviour promptly.

9.3.2 Where one-to-one meetings are necessary (e.g., supervision), Rhein-Sieg Institute of Arts & Design gGmbH will promote safe practice measures (visibility, scheduling, transparency, and appropriate record keeping).

10. Placements, external activities and partner assurance

10.1 General principles

10.1.1 Rhein-Sieg Institute of Arts & Design gGmbH recognises that safeguarding risk may increase during:

- placements/internships,
- external projects with third parties,
- field trips/study visits,
- events and exhibitions,
- outreach or recruitment activity.

10.1.2 Rhein-Sieg Institute of Arts & Design gGmbH will apply a risk-based safeguarding approach to external activities.

10.2 Risk assessment and approvals

10.2.1 Prior to placements and higher-risk external activities, Rhein-Sieg Institute of Arts & Design gGmbH will document:

- nature of activity and contact risks,

- supervision arrangements,
- accommodation/travel considerations (where applicable),
- reporting routes (Rhein-Sieg Institute of Arts & Design gGmbH and partner),
- emergency contacts and escalation triggers.

10.2.2 Rhein-Sieg Institute of Arts & Design gGmbH will determine whether additional controls are needed (e.g., enhanced supervision, restricted duties, additional briefing).

10.3 Partner safeguarding assurance

10.3.1 Where activities are hosted or delivered with partners, Rhein-Sieg Institute of Arts & Design gGmbH will seek appropriate assurance proportionate to risk, which may include:

- confirmation of partner safeguarding policies/procedures,
- named safeguarding contact at partner organisation,
- confirmation of staff suitability checks where relevant,
- agreement on information sharing and escalation routes.

10.3.2 Any safeguarding concerns arising in partner contexts must be reported through Rhein-Sieg Institute of Arts & Design gGmbH's centralised reporting process, in addition to any partner requirements, unless this would increase risk to the individual.

11. Monitoring, quality assurance and policy review

11.1 Monitoring and reporting

11.1.1 Rhein-Sieg Institute of Arts & Design gGmbH will monitor safeguarding activity to ensure that concerns are handled consistently, proportionately and in a timely manner.

11.1.2 The Lead Safeguarding Officer (LSO) will provide the Safeguarding Committee/Board with periodic anonymised reporting, which may include:

- number and broad categories of concerns (trend-level only);
- timescales for response and case progression;
- common risk themes and learning points;
- training completion status (compliance rates);
- any significant procedural issues or resourcing needs.

11.1.3 Anonymised reporting will be designed to support organisational learning and improvement while protecting confidentiality and personal data.

11.2 Quality assurance

11.2.1 Rhein-Sieg Institute of Arts & Design gGmbH will quality assure safeguarding practice by:

- maintaining clear written procedures and guidance;
- ensuring role-holders (LSO/Deputy/DSOs) have appropriate training;
- periodically reviewing a sample of safeguarding records for completeness and proportionality (access controlled);
- reviewing safeguarding elements of placement/outreach risk assessments where relevant; and
- maintaining cross-policy alignment (disciplinary, harassment/sexual misconduct, EDI, data protection, IT/online safety, H&S).

11.3 Policy review

11.3.1 This Policy will be reviewed:

- at least every 2–3 years, or sooner if required due to legislative changes, partnership requirements, organisational changes, or significant learning from cases.

11.3.2 The Safeguarding Committee/Board is responsible for approving revisions. Rhein-Sieg Institute of Arts & Design gGmbH will communicate any substantive changes to staff and students and update relevant handbooks and online resources.