Safeguarding for All Policy Incorporating Child
Protection and Prevent
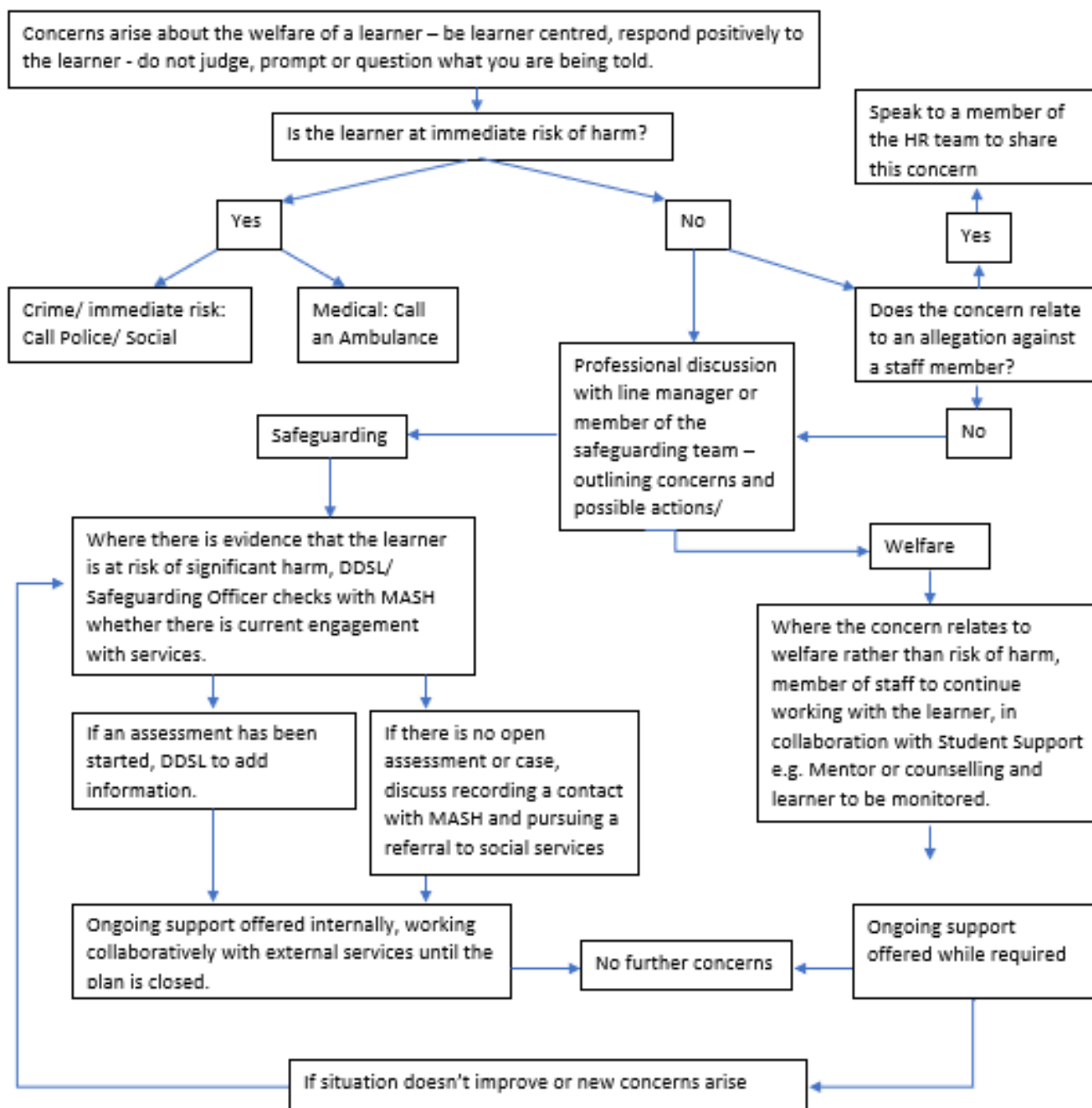
Key contacts

Role	Name	Contact details
Designated Safeguarding Lead (DSL) – Group	Jason Austin CEO and Principal	jaustin@rnngroup.ac.uk T: 01709 513333 Ext 1401 M: 07908827416
Deputy Designated Safeguarding Lead (DDSL) and Prevent Lead	Laura Reid Head of Student Support and Safeguarding	lreid@rnngroup.ac.uk T: 01709722747 M: 07946027955
Deputy Designated Safeguarding Lead (DDSL)	Tanya Gerstmar Head of SEND and High Needs	tgerstmar@rnngroup.ac.uk T: 01709513333 Ext 1021 M: 07805762882
Designated Teacher for Looked After Children	June Bacon Designated LAC Lead	jbacon@rnngroup.ac.uk T: 01709722844 M: 07969920279
Named Safeguarding Governor	Jennifer Worsdale	jennifer.worsdale@rnngroup.ac.uk

Safeguarding procedure for all staff

Concerns arise about the welfare of a learner – be learner centred, respond positively to the learner - do not judge, prompt or question what you are being told.

Is the learner at immediate risk of harm?

Yes
- Crime/ immediate risk: Call Police/ Social
- Medical: Call an Ambulance

No
→ Professional discussion with line manager or member of the safeguarding team – outlining concerns and possible actions/

Does the concern relate to an allegation against a staff member?
- **Yes** → Speak to a member of the HR team to share this concern
- **No** →

Safeguarding

Where there is evidence that the learner is at risk of significant harm, DDSL/ Safeguarding Officer checks with MASH whether there is current engagement with services.

- If an assessment has been started, DDSL to add information.
- If there is no open assessment or case, discuss recording a contact with MASH and pursuing a referral to social services

Ongoing support offered internally, working collaboratively with external services until the plan is closed.

Welfare

Where the concern relates to welfare rather than risk of harm, member of staff to continue working with the learner, in collaboration with Student Support e.g. Mentor or counselling and learner to be monitored.

Ongoing support offered while required

No further concerns

If situation doesn't improve or new concerns arise

<u>Advice for handling a disclosure</u>

DO (Recognise, Respond, Report and Record)

- **Recognise** changes in behaviour, appearance attendance and act accordingly.
- Take allegations or suspicions of abuse seriously
- **Respond** with tact and sensitivity to anyone who confides in you
- Re-assure the person that it is right to speak to someone
- Allow the person to speak in his/her own way and time
- Discuss the need to refer to the appropriate member of the College Safeguarding Team and **report** it quickly
- Make notes using the person's own words and **record** on Promonitor

DON'T

- **Promise confidentiality** but reassure it will only be shared with those who need to know
- Make judgements
- Investigate the allegation or suspicion of abuse
- Ask **leading questions** or probe for details
- Interpret what has been said or make assumptions about the situation
- **Contact parents/carers before seeking advice**

Contents

Scope of policy: All students, staff, contractors and visitors

1.   Policy Consultation & Review

Reference to 'RNN Group' within this policy refers to the provision of the current statutory corporation including: Further Education; Higher Education; 14-16 Education; Distance Learning; Apprenticeships; Subsidiaries; Subcontractors and other Employer Training. Reference to 'students' within this policy refers to 14-16-year olds, 16-18-year-old students, adults and apprentices.

This policy is the overarching Safeguarding Policy for all RNN employed staff, agency staff, organisations, stakeholders, volunteers, associates and visitors within its accountability and responsibility.

This policy is accessible via RNN Group websites and the staff portal and is available upon request from Student Services, Learner Recruitment and Reception desks. Parents and carers are informed of this policy within the Parent and Carers Guide and have access to it on the College Website. Students are informed of this policy during induction, Progress Tutor sessions, Student Portal, One File and via Student Safeguarding Newsletters.

This policy is provided to all staff (including temporary staff, governors and volunteers) at induction alongside the Staff Code of Conduct. Part One of the statutory guidance *'Keeping Children Safe in Education'*, DfE (reissued September 2022) is issued to all RNN Staff and evidence collected to show they have read and understood the guidance.

This policy will be reviewed in full by the Designated Safeguarding Leads in consultation with stakeholders and presented to the Governing Body on an annual basis.

2.   Purpose & Aims

The RNN Group places the safety and wellbeing of students and staff at the forefront of its operations and acknowledges the range of activities that contribute to creating and maintaining an environment which promotes effective safeguarding practice. This policy ensures a coherent framework of practice is in place for Safeguarding (incorporating child protection) and for all policies relating to this framework. The RNN Group is committed to ensuring it:

- *Provides a safe environment for everyone in which to learn,* while maintaining an attitude of 'it could happen here' where safeguarding is concerned;
- *Identifies those who are suffering, or likely to suffer, harm;*
- *Preventing impairment of children's mental and physical health or development;*
- *Takes appropriate action to see that everyone is kept safe, on site at all Group sites and related activities.*

The RNN Group acknowledges that abuse/ 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.

The RNN Group ensures that guidelines, procedures, training and personal support are in place to enable staff and students to confidently identify and respond appropriately to concerns relating to the safety of all. Designated personnel are available to assist staff who identify concerns and all concerns are treated seriously, regardless of the source of information. To ensure consistency, the RNN Group adopts the following steps when investigating concerns: information gathering; analysis; action.

The RNN Group ensures that all concerns are recorded accurately, with consideration of the student's wishes and where possible in the language given by the source of the concern. It will be stored securely and in line with RNN Group Data Protection and archiving policy.

This policy applies to the support of children and young people up to their 18th birthday as defined by the Children and Young Persons Act 2008. For those young people reaching their 18th birthday who need continuing services and support, this can be extended to their 25th birthday

- In the context of working in Further Education, where the majority of individuals are over the age of 16, whilst the law allows consensual sexual activity at the age of 16, if the child requires help and support the lawful nature of the activity does not stop intervention. Examples of this may be:

- Children and young people with care and support needs;

- Children in relationships with much older individuals or individuals in a position of authority and trust;

- Children who may be at risk of sexual abuse or exploitation;

- Children who are parents;

- Children whose care and support needs mean they are unlikely to be able to protect themselves despite their legal age.

3. Policy Amendments

Keeping Children Safe in Education (KCSIE)
The Department for Education has recently made amendments to KCSIE 2022 and republished the guidance to consider the new version of Working Together to Safeguard Children, 2018 and changes on Information Sharing to account for the new Data Protection Act 2018, and the General Data Protection Regulation, often known as GDPR and includes specific reference to the duties of sports clubs and organisations.

General Data Protection Regulation (GDPR)
Neither the General Data Protection Regulation (GDPR) nor the Data Protection Act 2018 (DPA2018) prevents or limits the sharing of information to keep children safe.
"Safeguarding of children and individuals at risk" is a condition within the Data Protection Act 2018 which will allow the Group to share relevant information without the need for consent.
Information can be shared lawfully if it is to keep a child or individual at risk, safe from neglect, physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.
The Group will not share personal information if the serious harm test under the legislation is met.

Safeguarding in Sport
Organisations that provide facilities for sporting clubs also have a responsibility to make sure that those clubs have everything in place to ensure that the safeguarding of children and promotion of their welfare is a priority
Departmental advice
What to do if you're worried about a child is being abused   https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

All staff must be aware their 'relationships and associations' (including online) may have a safeguarding implication.

4. Working in Partnership

Awareness and appreciation of the role of others is essential for effective collaboration between practitioners and their organisations. Inter-agency and collaborative work is central to good practice in safeguarding. The RNN Group work closely with statutory services to assist them in exercising their statutory functions, in line with the new Safeguarding Partnerships (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area). Where provision is provided by the RNN Group to a partner organisation such as a school, the RNN Group will liaise with staff to ensure that local procedures and protocols are adhered to.

The RNN Group will refer concerns that a child or young person or vulnerable adult might be at risk of significant harm to the Multi-Agency Safeguarding Hub, Single Point of Access (SPA), the Police or Channel and concerns for assessment of need and onward referral for other services if required to the Early Help Unit using the Early Help Assessment Form.

All referrals will need evidence that consent has been provided by the subject of the referral as well as the parent/carer, except where the referral relates to attendance matters or assistance in applications for parenting contracts, parenting orders, acceptable behaviour contracts and anti-social behaviour orders. Where there is a risk of significant harm and consent is not given then a justification will be provided of the need to share information.

The RNN Group works in partnership with the Safeguarding Boards and attends the local FE Colleges' Safeguarding Forums.

5. Roles & Responsibilities

All those working with or on behalf of children or vulnerable adults have a responsibility to protect them. All staff are aware that safeguarding issues or behaviours can be associated with factors outside of college and can occur with children/ people outside of the Group. The RNN Group has appointed key people who have specific safeguarding responsibilities and constitute the organisation's designated safeguarding team.

Board of Governors has strategic leadership responsibility for the RNN Group's safeguarding arrangements are accountable for appointing a safeguarding link governor and ensuring this policy is fit for purpose and up to date. The governing body will undertake appropriate training to ensure they are able to carry out their duty to safeguard all students and should review this policy and related procedures to ensure:

- *It is reviewed annually, is available publicly via RNN Group websites and has been written in line with 'Keeping Children Safe in Education', Local Authority advice and the requirements of the Local Safeguarding Children Board (LSCB) policies and procedures;*
- *Governors should read part 2 of Keeping Children Safe in Education, as a minimum but be aware they're responsible for compliance in Parts 3, 4 & 5. The Designated governor should read the full Keeping Children Safe in Education guidance.*
- *The Group contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children (2018); working with social care, the police, health services and other services to promote the welfare of children and protect them from harm;*
- *The Group contributes to multi-agency plans to provide additional support to those children subject to child protection plans; allowing access to Local Authority Children's Social Care should they need to conduct a section 17 or a section 47 assessment (see chapter 1 of Working Together to Safeguard Children 2018);*
- *The Group has due regard to the **Prevent Duty** Guidance 2019 and Action Plan, under Section 26 of the Counter-Terrorism and Security Act 2015; which aims to prevent children and young people from being drawn into extremism and terrorism;*
- *The Group has due regard to the **mandatory** reporting duty, which came into force in October 2015, of the **Female Genital Mutilation** Act 2003 which places a **statutory duty** on teachers (along with social workers and healthcare professionals) to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years;*
- *A member of the Executive Leadership Team (ELT) should be the Designated Safeguarding Lead (DSL) and take the lead responsibility for safeguarding and child protection, ensuring there is at least one named deputy to deal with any issues in the absence of the DSL and there is always cover for these roles;*

- *All staff receive safeguarding information as part of their induction they must evidence that they have read and understood Part One of 'Keeping Children Safe in Education' and be issued with RNN's Code of Conduct;*
- *All staff undertake appropriate safeguarding and child protection training that is updated regularly; in addition, all staff members will receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;*
- *Procedures are in place for dealing with allegations against members of staff and volunteers in line with Part Four of Keeping Children Safe in Education and local authority/LSCB guidance;*
- *Safer recruitment practices are followed in accordance with Part Three of 'Keeping Children Safe in Education';*
- *They remedy without delay any weakness in regard to RNN Group safeguarding arrangements that are brought to their attention.*
- *Safeguarding is a standing item on Governing Body agendas; that they receive regular updates with a minimum of one full safeguarding report from the DSL each academic year and that updates and the report will show all safeguarding activity which has taken place.*

Principal & Chief Executive will ensure that this policy (and others mentioned within it), are adopted by the governing body, are followed by ALL staff and is also responsible for:

- *Identifying a member of SLT to be the DSL;*
- *Identifying Deputy Designated Safeguarding Leads (DDSL) to ensure cover for the role;*
- *Ensuring all staff and volunteers feel able to raise concerns about poor or unsafe practice and that concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;*
- *Liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.*

Designated Safeguarding Lead has responsibility at a strategic level within the organisation for:

The Designated Lead takes lead responsibility for safeguarding, this is explicit in their job description
- *Ensuring Part One of the Keeping Children Safe in Education guidance is read and understood by all RNN employed staff;*
- *Making sure all staff are aware of how to raise safeguarding and Prevent concerns;*
- *Ensuring compliance with Government Legislation;*
- *Providing reports to the Board of Governors setting out how the RNN Group has discharged its duties and for reporting deficiencies in procedure or policy identified by the Safeguarding Boards, its sub groups or others at the earliest opportunity;*
- *Ensuring that the RNN Group has procedures and policies which are consistent with the local Safeguarding Boards procedures and Prevent duty;*
- *Raising awareness within safeguarding practice to prevent radicalisation of students and compliance with the 'Prevent' duty*
- *Creating an environment where staff model respectful and appropriate behaviour, where children and young people are clear about what is acceptable and unacceptable behaviour, and where they are confident to ask for help and support when they need it.*
- *Identifying how the RNN Group has complied with this policy, including but not limited to a report on the training that staff have undertaken;*
- *Ensuring the DSL & DDSLs undertaking training (which is updated every two years) to enable them to carry out their roles and that they update their knowledge at regular intervals (at least annually) via e-bulletins, meeting other DSLs;*
- *Raising awareness of issues and providing advice and support to other staff relating to the welfare of children and young people, vulnerable adults and staff;*
- *The promotion of a safe environment for everyone learning and working within the Group in line with its duty as part of Keeping Children Safe in Education, the requirements of the Local Safeguarding Boards and the Disclosure and Barring Service and Prevent;*

- *Raising awareness of and promotion of all forms of equality to foster greater understanding of and respect for, people of all faiths (or those of no faith), race, gender, age, disabilities and sexual orientation (and other groups with protected characteristics), and how well students and staff are protected from harassment, bullying, abuse and discrimination, including those based with employers and at other sites external to the provider;*
- *Preparing students for successful life in modern Britain and promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs;*
- *Preparing students who have special educational needs and/or disabilities to become more independent in their everyday life;*
- *Establishing a clear line of accountability for the provision of services;*
- *Identifying groups of more vulnerable children and young people with the view to providing 'Early Help' in line with current legislation;*
- *Aiding the identification of children and young people at risk of significant harm, and providing procedures for reporting concerns*, understanding that it may be difficult for some learners to approach staff about their circumstances;
- *Establishing procedures for reporting and dealing with allegations of abuse against members of staff;*
- *The safe recruitment/employment of staff and the safe use of contractors, employers, partners and subcontractors;* Promoting a culture of listening to children and young people to ensure best practice and keep their wishes at the centre of activities ensuring that the organisation is operating at all times in the best interest of the child/young person/student;
- *Ensuring all staff are aware that safeguarding issues can manifest themselves via peer on peer abuse;*
- *Ensuring processes are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future;*
- *Reviewing processes of sharing information with other professionals;*
- Responsibility for ensuring all Child protection/ safeguarding files are kept up to date, including a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome
- *Ensuring that appropriate processes are in place for forwarding child protection and safeguarding files to the receiving education provider when leaving the RNN Group. This includes evidence to demonstrate how the file has been transferred and evidence of recorded delivery/receipt;*
- *Maintaining contact with Prevent leads and forums in relation to the Prevent Duty.*
- *Having clear procedures in place so that any concerns can immediately be brought to specialist attention;*
- *Providing a contact for any further information regarding the Prevent Duty;*
- *Ensuring all students and apprentices are able to express views in non-extremist ways and create an environment that encourages respectful free speech;*
- *Policies and clear guidance on acceptable use of the internet and online safety;*
- *Ensuring staff are trained to identify and deal with concerns about online safety.*

Executive Director of Human Resources, Organisational Development and Marketing has responsibility at a strategic level for:
- *Maintaining the Single Central Record;*
- *Receiving and processing concerns related to the behaviour of staff;*
- *Developing the Staff Code of Conduct;*
- *Corporate induction processes;*
- *Coordination and monitoring of mandatory safeguarding related training (including Prevent) for all staff;*
- *The safe recruitment/employment of all staff and the safe use of contractors.*
- *Recruiting and vetting of staff and other relevant individuals within the RNN Group, including DBS checks;*

Executive Director of Estates of Corporate Services has responsibility at a strategic level for:
- *Health & Safety;*
- *Risk assessments;*
- *First Aid Procedures;*

● *Estates and IT.*

Deputy Designated Safeguarding Leads are responsible for:
All deputies are trained to the same standard as the Designated Safeguarding Lead, the role is explicit in their job descriptions.
- *Ensuring all staff understand the symptoms of child abuse and neglect;*
- *Ensuring processes are in place for referring concerns to social care;*
- *Supporting and assisting staff or students to make referrals;*
- *Identifying and recruiting a safeguarding team with responsibility for liaising with Services, attending CIN and CP conferences and meetings and updating safeguarding panels;*
- *Referral of cases of suspected abuse or allegations to Children and Young People's Services – Social Care and/or The Police, Channel and appropriate agencies;*
- *Supporting the safeguarding team and assisting staff and students who are reporting concerns;*
- *Liaising with Children & Young People's and Adult Services as appropriate;*
- *Monitoring referrals and student wellbeing through appropriate panel meetings*
- *Providing a holistic approach to safeguarding through the disciplinary policy and procedures relating to the conduct of students and the coordination and organisation of the RNN Group's internal student support and assessment services and developing the Colleges' Charter;*
- *Developing safeguarding training materials, files, procedures and contacts;*
- *Delivering training where appropriate;*
- *Ensuring that staff receive basic training in child protection issues and are aware of the Group's safeguarding procedures;*
- *Reporting to SLT where appropriate;*
- *Ensuring that the DSL is informed of how the RNN Group have complied with this policy, including but not limited to a report on the training that staff have undertaken.*

Designated Safeguarding Team are responsible for:
- *Monitoring children who are the subject of Child Protection and Child in Need Plans;*
- *Providing advice and support to other staff on issues relating to child protection;*
- *Maintaining accurate and secure child protection records of any child protection referral, complaint or concern (even where that concern does not lead to a referral) ensuring they are kept confidential and stored securely;*
- *Liaising with the appropriate Children and Young People's and Vulnerable Adult's Social Care services, Safeguarding Boards, Early Help Units and other appropriate agencies where necessary and take part in strategy discussions and other multi-agency meetings and contribute to the assessment of children/ vulnerable adult, including Early Help assessments;*
- *Supporting Liaison and Skills and Employability tutors to work with employers and training organisations that receive children or young people from the RNN Group on long term placements to ensure that appropriate safeguards are put in place;*
- *Sharing pertinent and appropriate information with partner agencies and organisations in compliance with information sharing protocols and data protection law;*
- *Keeping skills, training and knowledge up to date. The team will have received training in child protection issues and inter-agency working, as required by the local Safeguarding Boards, with refresher training at least every 2 years with regular updates to their knowledge at least annually;*
- *Seeking feedback from children and young people, making sure that they have a voice as to the Group's safeguarding practice, policies and procedures;*
- *Identifying and assessing levels of risk associated with Criminal Convictions and referrals to Safeguarding panel;*
- *Supporting and advising colleagues where student(s) behaviour(s) or action(s) do not uphold the RNN Group code of conduct expectations, or where student(s) are suspected to be in possession of offensive weapons or substances, in line with security and student disciplinary policies and procedures.*

Teaching & Learning Teams are responsible for:
- *Promoting British values through teaching, learning and assessment activities;*

- *Providing a dedicated study programme and/or framework or standard which defines and explores British values and how they influence our society;*

Promotion of children's welfare

- *Creating opportunities for students to apply their learning to relevant situations and contexts;*
- *Be aware of signs of abuse and report concerns in a timely manner;*
- *Creating an environment where victims of abuse can make disclosures, being supportive, protective and ensure interventions are timely*
- *create an environment where staff model respectful and appropriate behaviour, where children and young people are clear about what is acceptable and unacceptable behaviour, and where they are confident to ask for help and support when they need it.*
- *Encouraging students to respect each other and their differences, including with regard to protected characteristics outlined in the Equality Act 2010 - ensure appropriate consequences for those who do not show these behaviours.;*
- *Ensuring students are able to express views in non-extremist ways and create an environment that encourages respectful free speech;*
- *Liaising with employers and training organisations (where appropriate) that receive children or young people from the RNN Group on long term placements to ensure that appropriate safeguards are in place;*
- *Ensuring that children and young people on placement and training are aware of this policy and how to make a referral for themselves, others, or relating to the setting;*
- *Escalating concerns in relation to a setting or placement to the DSL or DDSL for referral to the LADO.*

Student Support Teams are responsible for:

- *Liaising with secondary schools and academies which send pupils to the RNN Group to ensure that appropriate arrangements are made for the students;*
- *Ensuring that parents of children and young people within the RNN Group are aware of the Group's Safeguarding Policy via School designated staff;*
- *Supporting RNN colleagues to work with employers and training organisations that receive children or young people from the RNN Group on long term placements to ensure that appropriate safeguarding arrangements are in place;*
- *Ensuring that children and young people on placement and training are aware of Safeguarding policies and procedures and how to make a referral for themselves, others, or relating to the school, academy or organisation;*
- *Escalating concerns in relation to a school, academy or organisation to the DSL for referral to the LADO.*

Apprenticeship Team are responsible for:

- *Ensuring employers are aware of their safeguarding and Prevent duty;*
- *Coordinating safeguarding and Prevent guidance and training;*
- *Providing a contact for any further information regarding the Prevent Duty;*
- *Ensuring employers are aware of how to manage risks and concerns;*
- *Ensuring through safeguarding checks with employers that any staff working with students in a position of trust do not present any danger or threat, are appropriate for the role and have had an appropriate check completed with the Disclosure and Barring service;*
- *Ensuring through checks with employers that staff supervising and working with students have received training and an understanding of their role in safeguarding children and young people.*
- *Ensuring apprentices have an awareness of safeguarding and understand how to access RNN support services.*
- *Ensuring that apprentices are aware of this policy and how to make a referral for themselves, others, or concerns relating to the employer.*

Employers are responsible for:

- *Understanding their responsibilities with regard to relevant government legislation and RNN policies and procedures;*

- *Ensuring staff working with students in a supervisory role or position of trust are appropriate for the role, do not present any danger or threat and have had an appropriate check completed with the Disclosure and Barring service';*
- *Ensuring staff supervising and working with students have received training and an understanding of their role in safeguarding children and young people;*
- *If possible, identifying a person to coordinate safeguarding across their organisation;*
- *Demonstrating a commitment to the principles that underpin the Prevent Duty;*
- *Seeking specialist support if any concerns are raised;*
- *Maintaining clear procedures so any concerns can immediately be brought to specialist attention.*

Bids & Contracts Team are responsible for:
- *Ensuring partners are aware of their safeguarding obligations, through guidance and training;*
- *Ensuring that any staff working with students in a position of trust are appropriate for the role and do not present any danger or threat;*
- *Ensuring any people working with young or vulnerable people have had an appropriate check completed with the Disclosure and Barring service;*
- *Ensuring staff supervising and working with students have received training and an understanding of their role in safeguarding children and young people;*
- *Ensuring students have an awareness of safeguarding and understand how to access the RNN Group support services;*
- *Ensuring students are aware of this policy and how to make a referral for themselves, others, or relating to the partner;*
- *Conducting a full audit on safeguarding, Prevent, e-Safety, H&S etc at the beginning of each academic year;*
- *Collecting safeguarding returns on a monthly basis and submitting reports to the Safeguarding Management Group;*
- *Maintaining the partner Single Central Record.*

IT & Estates Teams are responsible for:
- *Maintaining policies and procedures relating to Health and Safety and safe use of technology.*
- *Maintaining the policy and procedure in relation to external contractors working on site.*

Designated LAC Lead (Designated Teacher) is responsible for:
- *Working with local authorities to promote the educational achievement of registered Looked after Students (LAC);*
- *Undertake appropriate training;*
- *Holding details of the local authority(s) Personal Advisor(s) appointed to guide and support the care leaver(s) and will liaise with them as necessary regarding any issues of concern affecting the care leaver(s).*

Safeguarding & Equality & Diversity Management Group
These committees should be chaired by the Deputy CEO and Principal (or other appropriate SLT member), the group should include relevant Governors and include enough senior members of staff to ensure appropriate resources are allocated to safeguarding and equality & diversity.

6. Reporting Structures
The Safeguarding & Equality & Diversity Management and Quality and Standards Groups report on safeguarding and equality & diversity to the Senior Leadership Team, which in turn report to the Board of Governors.
Reporting disclosures
The Designated Safeguarding Lead is: Jason Austin, 01709 722897, jaustin@rnngroup.ac.uk
The Deputy DSLs are:
Laura Reid, 01709 722747, lreid@rnngroup.ac.uk
Tanya Gerstmar, 01709 513333 Ext 1021, tgerstmar@rnngroup.ac.uk
Angela Bates, 01909 504731, angela.bates@rnngroup.ac.uk

All staff are aware of the wider safeguarding team members and how to contact them. Our electronic recording system automatically includes members of the safeguarding team in any concerns and we have a safeguarding email that links to members of the safeguarding team to ensure concerns are addressed in a timely manner.

The arrangements for contacting children's services are:

Rotherham MASH 01709 336080

Nottinghamshire MASH 0300 500 80 90

Doncaster Children's Service Trust 01302 734100

Barnsley Local Authority Children's Social Care Assessment Team (01226) 772423

Sheffield Safeguarding Hub 0114 273 4855

Should a learner, in the Group's view, be at risk of significant harm and local agencies are not able to respond, the Group will immediately follow the Safeguarding Children Partnership escalation procedure, available here:

Rotherham: https://rotherhamscb.proceduresonline.com/chapters/p_neglect.html?zoom_highlight=graded&zoom_highlight=graded

Nottinghamshire: https://nottinghamshirescb.proceduresonline.com/p_conflict_res.html

Doncaster: https://doncasterscb.proceduresonline.com/

Sheffield: https://sheffieldscb.proceduresonline.com/index.htm

Barnsley: https://www.proceduresonline.com/barnsley/scb/p_escalation.html

7. Safeguarding Children

In relation to learners under the age of 18 years old, and classed as a child in law, the RNN Group has a statutory duty, as set out in the Education Act 2002 and Children Act 2004, to promote and safeguard the welfare of children and have due regard to guidance issued by the Secretary of State at all times. The RNN Group adopts the definitions used in the statutory guidance for schools and Colleges: Keeping children Safe in Education, issued by the Department for Education (DfE), which applies to all children and, defines safeguarding and promoting children and young people's welfare as:

- Protecting children from maltreatments.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and;
- taking action to enable children to have the best outcomes.

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect children who are suffering, or are likely to suffer significant harm including all forms of abuse and neglect, female genital mutilation or other so-called honour-based abuse, and extra familial threats like radicalisation and any kind of child exploitation such as sexual exploitation, criminal exploitation and serous youth violence. Such concerns will be referred to Local Authority Children's Social Services and the Police if appropriate.

8. Safeguarding Adults

In relation to learners 18 years and over, and classed as an adult in law, the RNN Group has a statutory safeguarding duty, as set out in the Care Act 2014, which must be seen in conjunction with Mental Capacity Act 2005 and the Human Rights Act 1998. The RNN Group must have regard to guidance issued by the Secretary of State at all times.

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 and 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 with the risk of, or the experience of abuse and neglect.

The Care Act statutory guidance defines safeguarding as "protecting an adult's right to live in safety, free from abuse and neglect". The above duties apply in relation to any person who is aged 18 and over and at risk of abuse or neglect because of their needs for care and support. Such concerns will be referred into Local Authority Adult's Social Care and the Police as appropriate.

Whilst these duties have to be met for a referral to Local Authority Adult Social Care and/ or the Police, the RNN Group policy is to safeguard all learners. While a concern may not meet the threshold for such a referral and/ or support of these external services, the RNN Group is committed to the safeguarding and support of all learners as appropriate.

The adult with care and support needs, in need of safeguarding, will hereafter be referred to as the adult through this policy.

9. Supporting Students at Risk

The RNN Group recognises that its college environments may be the only stable, secure and predictable element of an 'at risk' student's life. However, it is important to note that the behaviour of students at risk may present as challenging, defiant or withdrawn. The RNN Group aims to identify students at risk through a variety of methods:

- *Application and enrolment screening;*
- *Partner referral e.g. Social Workers;*
- *School liaison and transfer of transition information including safeguarding records;*
- *EHCP Consultation and Review Process;*
- *Induction process;*
- *Student finance application form screening;*
- *ALS team screening;*
- *Disciplinary referrals;*
- *Academic and support staff reporting and monitoring;*
- *Welfare and mentoring staff reporting and monitoring;*
- *Self-referral;*
- *Employer or placement referral;*
- *Suitability and progress boards.*

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

RNN Group aims to support students through:

- *Forging excellent working partnerships with other Colleges, schools and agencies which can help to inform a student's specific issues and needs. For example; LAC students, previously LAC students, or those who are subject to a Child Protection or Child in need or EHCP plan;*
- *A curriculum which encourages confidence, self-esteem, and self-motivation and provides opportunities for students to develop the skills they need to identify risks and stay safe;*
- *The RNN Group 'culture of safety' which promotes a positive, supportive and secure environment which provides all with a sense of being respected and valued;*
- *Consistent implementation of codes of conduct and behavioural policies which ensure that students identify and understand acceptable levels of behaviour;*
- *Continuing support and activities for additional learning support, student support and student finance teams;*

- *Strong links with external partners as well as local and national agencies to ensure a multi-disciplinary approach to educational, health, care and safety support;*
- *Development of a responsive and knowledgeable staff group, trained to respond appropriately to safeguarding situations;*
- *Effective absence reporting, which can be an early indicator of concern;*
- *Encouraging students to state how safe they feel via the RNN Group 'Student Voice' activity;*
- *Regular Safeguarding Team Meetings where key members of student support teams, collaboratively coordinate action and support for priority cases.*
- *Home visits is not something that College includes as part of its offer to at-risk learners, however in extenuating circumstances, where all other options have been exhausted, this may be seen as a requirement to check the safety/ wellbeing of a learner. If this situation arises, staff must discuss with their line manager and visits can only be carried out with two members of staff present.*

10. Children with Special Educational Needs and Disabilities (SEND)

Students with special educational needs and disabilities (SEND) may face additional safeguarding challenges and additional barriers may exist when recognising abuse and neglect in this group of children. This can include:

- *Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;*
- *Students with SEND can be disproportionately impacted by actions such as bullying without outwardly showing any signs;*
- *Communication barriers and difficulties in overcoming these barriers.*

Where there are any concerns raised about the safety and welfare of a student with SEND, the RNN Group will ensure that these will be treated in the same way as with any other child, with careful consideration of any additional needs. More information on children with SEND is contained in Annex A of Keeping Children Safe in Education, the NSPCC document 'We have the right to be safe – Protecting disabled children from abuse' (October 14).

11. Mental Capacity

The Mental Capacity Act 2005 (the Act) provides the legal framework for acting and making decisions on behalf of individuals who lack the mental capacity to make particular decisions for themselves. Everyone working with and/or caring for an adult who may lack capacity to make specific decisions must comply with this Act when making decisions or acting for that person, when the person lacks the capacity to make a particular decision for themselves. The same rules apply whether the decisions are life-changing events or everyday matters.

The Act's starting point is to confirm in legislation that it should be assumed that an adult (aged 16 or over) has full legal capacity to make decisions for themselves (the right to autonomy) unless it can be shown that they lack capacity to make a decision for themselves at the time the decision needs to be made. This is known as the presumption of capacity. The Act also states that people must be given all appropriate help and support to enable them to make their own decisions or to maximise their participation in any decision-making process.

12. Care experienced learner (Looked after Children and Previously Looked After Children)

A care experienced learner, (may be called a Looked after Child (LAC)) is one which is looked after by a local authority (as defined in section 22 of the Children Act 1989) and who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. The most common reason for children becoming looked after is as a result of abuse and/or neglect. The RNN Group ensures that staff have the skills, knowledge and understanding necessary to keep care experienced students safe. The RNN Group has a designated teacher for this group of students who works closely with the Virtual School Team and the Local Authority. It is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

13. Learners with a Child Protection Plan, or Child in Need Plan

Staff should be aware that these learners may need additional support, services, assistance, protection and consideration.

The Safeguarding Team are the single point of contact for coordinating support for these learners both internally and externally. The Safeguarding Team will hold a record of these learners including contact details of the learner's social worker, where relevant, and any other agencies working with the learner.

Staff are expected to work alongside the Safeguarding Team to provide regular and timely updates regarding the progress of these learners in college and any areas of concern within or outside of college. In addition, staff working with these learners are required to provide, as a minimum, a fortnightly update for the Safeguarding team on attendance, progress, achievements and any concerns. This will allow any issues and/ or support needs to be identifies early an allow for appropriate action to be taken in response.

The RNN Group will liaise as necessary with the social worker, external agencies and next of kin, as appropriate regarding any issues of concern affecting the learner.

14. *Children or Young People Missing in Education*

Students missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation and becoming NEET (not in education, employment or training) later in life. Knowing where students are during college hours is an extremely important aspect of Safeguarding. Missing learning can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues. The RNN Group monitors attendance carefully to swiftly address poor or irregular attendance, following up with parents/carers where appropriate. The RNN Group aims to have TWO up to date contact numbers for parents/carers and strongly encourages parents/carers to update the RNN Group as soon as possible if their contact details change.

The RNN Group has appropriate procedures in place for unauthorised absence and for dealing with students that go missing from education, particularly on repeat occasions. This helps identify the risk of abuse and neglect, including sexual exploitation, and helps prevent the risks of them going missing in the future. All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and Forced Marriage.

15. *Child abduction and community safety incidents*

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. Progress Tutors deliver sessions to provide practical advice on how to keep themselves safe, as our learners become more independent.

16. *Modern Slavery and the National Referral Mechanism*

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

17. *Cybercrime*

 Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

 Cyber-dependent crimes include;

 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

 • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. 128 Children with

particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
 If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

18. Early Help Support
Early help means providing support as soon as a problem emerges, at any point in a child's life, from foundation years through to teenage years. The RNN Group works with local agencies to put processes in place for the effective assessment of the needs of individual children who may benefit from early help services. This may be a child who:

- *Is disabled and has specific additional needs/Has special educational needs (whether or not they have a statutory education, health and care plan);*
- *Is showing signs of engaging in antisocial or criminal behaviour, including gang involvement and association with organised crime groups;*
- *Is frequently going missing from care or from home;*
- *Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic abuse; being a young carer;*
- *Is misusing drugs or alcohol;*
- *Is at risk of modern slavery, trafficking or exploitation;*
- *Is at risk of being radicalised or exploited;*
- *Has returned home to their family from care; is a privately fostered child;*
- *Is showing early signs of abuse and/or neglect.*

19. Abuse through Electronic Communication
Sending abusive emails, texts and letters can be an offence under section 127 of the Communication Act 2003 (improper use of public electronic communications network). This includes sending an electronic message to cause someone annoyance, inconvenience or needless anxiety.

20. Online Safety
The RNN Group ensures students are aware of appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom which is included in the Information Communication & Technology (ICT) Policy Guidelines and Procedures. Staff need to be aware that concerns can occur both online and offline simultaneously. The RNN Group is aware that the predominant issues associated with online safety are:
- *Content – exposure to illegal, harmful or inappropriate material; for example, pornography, fake news, racist or radical, extremist views,* misogynist and misandrist concerns*;*
- *Contact – harmful online interaction with others; for example, commercial advertising as well as adults posing as children or young people;*
- *Conduct – personal online behaviour that increases the likelihood, or causes harm; for example, making, sending and receiving explicit images (the production and sharing of sexual images of under 18s is illegal), or online bullying.*

The RNN Group has monitoring and filtering systems and procedures for identifying and escalating concerns arising as a result of the systems.

21. Mental Health
All staff are aware that mental health problems can in some circumstances be an indicator of a child suffering or being at risk of significant harm. Staff should not attempt to diagnose conditions unless trained to do so, however

staff are well placed to monitor and report on behaviours, signposting to support internally and making referrals regarding safeguarding concerns.

22. Harassment
Harassment is a crime where someone harasses another person (including causing alarm or distress) on more than one occasion (section 2 of the Protection from Harassment Act 1997). A person does not have to intend to cause harassment to commit this crime, so long as they ought to have known that their actions would cause alarm or distress.

23. Hate Crime
A hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice toward someone's actual or perceived race, religion, disability, sexual orientation, or identity. It includes crimes that are motivated by homophobia, biphobia and transphobia and can affect not only those who identify as LGBTQ, but also those who are perceived to identify as LGBTQ.

Reporting Hate Crime
Crimes committed against someone because of their disability, gender-identity, race, religion or belief, or sexual orientation are hate crimes and should be reported to the police. Hate crimes can include (but are not limited to):
- *Threatening behaviour*
- *Assault*
- *Robbery*
- *Damage to property*
- *Inciting others to commit hate crimes*
- *Harassment*

24. LGBTQ
LGBTQ (lesbian, gay, and bisexual, transgender, queer or questioning) students may face additional safeguarding challenges and potential peer on peer abuse. Training for staff and students is provided to raise awareness and tolerance in line with Fundamental British Values and the RNN Group values through staff development and tutorial programmes and the embedding of equality and diversity within curriculum and support. The RNN Group has a zero-tolerance policy on bullying and any reported cases of abuse are investigated in line with the RNN Group disciplinary policy with interventions and support provided through RNN Group services and external referral processes.

25. Child on child/ peer on peer abuse
Keeping Children Safe in Education (2022) have changed their terminology to child on child rather than peer on peer, which could suggest the victim and preparator are of the same or similar age, which is not always the case. Due to the age range at the RNN Group Peer on Peer will be the terminology used as it is more inclusive for all learners. RNN staff are aware that learners can abuse other young people and that it can happen in or out of college or online. They understand that even if there are no reports it doesn't mean it is not happening and they should report any concerns to the Safeguarding Team. Staff understand the importance of challenging inappropriate behaviour between peers, downplaying certain behaviours, for example dismissing sexual harassment as 'just banter' can lead to a culture of unacceptable behaviours, an unsafe environment. In the worst case this could lead to a culture that normalises abuse leading to children accepting it as normal and not coming forward to report.
Peer on peer 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 peers;
- 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 violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); For further information about sexual violence see Annex B.

- 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 nudes and semi nudes' 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).

26. Child Sexual Exploitation (CSE) and Criminal Exploitation of Children (CCE) (county lines)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The criminal exploitation of children is a geographically widespread form of harm that typically crosses county boundaries. Key to identifying potential involvement are 'missing episodes', that is when a child may have been trafficked and/or groomed for the purpose of transporting drugs. Like other forms of abuse and exploitation, this can affect any child under the age of 18, appear consensual and could involve violence or threats of violence and enticement.

Rises in Knife Crime are linked to Criminal Exploitation of Children, College raises awareness of the dangers of carrying knives or weapons.

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 nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact 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 of grooming a child in preparation for abuse including via the internet.

27. Organise Crime Groups

An OCG is defined as a group which:
- has at its purpose, or one of its purposes, the carrying on of criminal activities, and
- consists of three or more people who agree to act together to further that purpose.

It is not necessary for the individual participating in the OCGs criminal activities to know any of the group members

28. Preventing Radicalisation and Extremism (Prevent Duty)

The RNN Group has due regard to the Prevent Duty Guidance 2015, under Section 26 of the Counter-Terrorism and Security Act 2015, which aims to prevent children and young people from being 'drawn into extremism and terrorism'.

All learning environments use age-appropriate curriculum to ensure that students understand how people with extreme views share these with others, especially using the internet. The RNN Group are committed to ensuring that students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain, teaching the RNN Group core values alongside the fundamental British Values supports quality teaching learning and assessment, whilst making a positive contribution to the development of a fair, just and civil society. Early indicators of radicalisation or extremism may include:

- *Showing sympathy for extremist causes;*
- *Glorifying violence, especially to other faiths or cultures;*
- *Making remarks or comments about being at extremist events or rallies;*
- *Evidence of possessing illegal or extremist literature;*

- *Advocating messages similar to illegal organisations or other extremist groups;*
- *Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent);*
- *Secretive behaviour;*
- *Online searches or sharing extremist messages or social profiles;*
- *Intolerance of difference, including faith, culture, gender, race or sexuality;*
- *Graffiti, art work or writing that displays extremist themes;*
- *Attempts to impose extremist views or practices on others;*
- *Verbalising anti-Western or anti-British views;*
- *Advocating violence towards others.*

Any leaflets distributed on campus should be checked by the Safeguarding team before circulation is allowed.

The RNN Group engages with parents, families, schools and employers to spot signs of radicalisation and assists and advises those families who do raise concerns to point them in the direction of support mechanisms i.e., the Local Authority, Police and/or the Channel Programme.

As with other safeguarding risks, staff are alert to changes in students' behaviour which could indicate they may need help or protection. Staff use their judgement to identify students who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals for concerns that an individual might be vulnerable to radicalisation. Referrals to the Channel Panel in Rotherham are via the LA Local Authority Children's Social Care Multi-Agency Safeguarding Hub (MASH) on 01709 336080.

RNN Lost property procedures further safeguard students by adopting a process for lost property that includes security measures for bags found unattended. See Lost property procedures for further information.

29. 16-19 Study Programmes/Adult Entry
These programmes are designed to provide students with a structured and challenging learning programme that supports their development and progression in line with their career plans. Applications for a 16-19 study programme made by adult students will be considered on an individual basis with consideration being given to RNN Group policies and procedures in particular the Safeguarding for All and DBS Clearance policies in line with the Rehabilitation of Offenders Act and other relevant legislation.

30. Working with Parents & Carers
The RNN Group is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand statutory responsibilities. When new students join the RNN Group they will be informed of the safeguarding policy at induction.

The RNN Group is committed to working with parents and carers positively, openly and honestly and ensures that all parents/carers are treated with respect, dignity and courtesy.   The RNN Group respects parents/carers' rights to privacy and confidentiality and will not share sensitive information unless it has their consent or it is necessary to do so in order to safeguard a child from harm.   The RNN Group has a responsibility to promote the protection and welfare of all children/ vulnerable adults aims to achieve this in partnership with parents/carers.

The RNN Group seeks to share with parents any concerns about their child *unless* to do so may place that child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the RNN Group has about a child/ vulnerable adult will not prevent the DSL making a referral to MASH/ SPA in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the RNN Group requires parents/ carers/ guardians to provide accurate and up to date information regarding:

- *Full names and contact details of all adults with whom the child normally lives;*
- *Full names and contact details of all persons with parental responsibility (if different from above);*
- *Emergency contact details – at least one in order to be able to contact a responsible adult should a concern arise eg, illness, a child going missing or a safeguarding concern;*
- *Full details of any other adult authorised to discuss student concerns.*

The RNN Group will retain this information on its management information systems. The RNN Group will only share information about students to adults who have parental responsibility or where a parent has given permission and RNN has been supplied with the adult's full details in writing. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

31. The Learner's Wishes

Where there is a safeguarding concern the child or young person or vulnerable adult's wishes and feelings will be considered when determining what action to take and what services to provide. The RNN Group has systems in place for children and young people to express their views and give feedback. Ultimately, all systems and processes operate with the best interests of the child and young person at their heart.

32. Safer Recruitment

The Governing Body and Principal/Chief Executive ensure that safer recruitment practices are followed in accordance with the requirements of Part Three of *'Keeping Children Safe in Education'.* The RNN Group has a written recruitment and selection policy in place to ensure at least one member of every interview panel, when recruiting new staff, has completed safer recruitment training. The RNN Group ensures that safer recruitment training is undertaken on a regular basis and is up to date with changes to guidance, policy and procedures.

The RNN Group will use the recruitment and selection process to deter, reject or identify unsuitable candidates. Part Three of Keeping Children Safe in Education describes in detail those checks that are, or may be, required for any individual working in any capacity at, or visiting any college environment. The RNN Group will always act reasonably when making decisions about the suitability of any prospective employee based on checks and evidence, including criminal record checks (Disclosure and Barring Service), barred list checks, prohibition checks (for teaching posts) and online searches for successful interview candidates together with references and interview information.

The RNN Group will maintain a Single Central Record (SCR) of all safer recruitment/pre-appointment checks carried out in line with statutory requirements. The SCR will contain information on all staff members on the following:

- *An identity check;*
- *A barred list check;*
- *An enhanced DBS check/certificate;*
- *A prohibition from teaching check;*
- *A minimum of 2 satisfactory references, in line with safer recruitment guidelines;*
- *A check of professional qualifications;*
- *A check to establish the person's right to work in the UK;*
- *Further checks on people who have lived or worked outside the UK in the last 5 years;*
- *Any other relevant information we feel should be included on the SCR such as volunteers, , mandatory and safer recruitment training records etc.*

The RNN Group has assessed its provision and has concluded that it qualifies as a "Specified Place" with the majority of its provision being provided to children. This assessment has been made based on two considerations. Firstly, the definition of a child under the Education Act 2002 which states that a child is any person aged under the age of 18. Secondly the number of 16-18 full time enrolments at the College. This second consideration will be reviewed on an annual basis to see if the RNN Group still meets the definition of a "Specified Place".

All new staff will be subject to an enhanced Disclosure and Barring Service (DBS) check in line with the Group's safer recruitment policies and procedures. All interviews for new staff include a question in regards to safeguarding and at least one member of the interviewing panel will have undertaken the 'safer recruitment training'. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

Agency workers and contractors with 'intensive' or frequent contact with Children and /or students with personal and support needs will be expected to have an enhanced DBS check.
The associated 'Recruitment and Selection Policy' gives greater detail to the process and can be found in the Human Resources section of the Staff portal. Records of all staff are kept confidentially by HR in the single central record.

33. *Staff Conduct, low level concerns & the use of 'Reasonable Force'*
Guidance about acceptable conduct and safe practice is given to staff and volunteers during induction.   This guidance outlines the sensible steps that every adult should take in their daily professional conduct with students. There are circumstances, however, when it is appropriate for staff to use 'reasonable force' to safeguard children and young people.   'Reasonable Force' covers the broad range of actions which may be used by staff that involves a degree of physical contact to control or restrain children. This could range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. RNN Group Security and appropriate staff members will be trained in how to use reasonable force along with supporting conflict management training with authorisation by the RNN Group Principal & Chief Executive to use necessary and reasonable force to prevent or stop a potentially harmful/violent or dangerous act taking place where the well-being of students or another member of staff is at risk in line with the RNN Group Security Policy.

A 'low-level' concern is any concern that is inconsistent with the RNN Group's staff code of conduct (including inappropriate conduct which may have occurred inside or outside of the workplace) or a concern that does not specifically meet the harm threshold and is therefore not considered serious enough to require a LADO referral. An example of a 'low-level' concern is photographs being taken of students on a mobile phone without prior consent or humiliation of a learner.

All concerns regarding staff/workers of the College are important, therefore a 'low-level' concern does not mean that the information is insignificant, all concerns relating to staff/workers should be reported to a member of HR (hr@rnngroup.ac.uk) for investigation.

34. *Disclosure & Barring Service*
New Staff, Agency & Volunteer Workers
All new RNN Group staff, agency and volunteers will be required to have a satisfactory enhanced DBS check as the RNN Group is deemed to be operating in a regulated activity due to the high number of young students and those with support and care needs.

Any staff members who do not have a valid DBS disclosure will not be allowed unsupervised access to children under the age of 18 or students with support and care needs until this has been received. In this circumstance a risk assessment must be undertaken and agreed by a Senior member of HR on every occasion before the member of staff can commence employment. In the event that a DBS certificate is not clear, then a further risk assessment will need to be completed and agreed by either the Principal or the Executive Director of HR in the Principals absence.

All students undertaking industry placement opportunities with access to children will also be required to have an enhanced DBS check in line with Placement Provider and the RNN Group's Disclosure and Barring Clearance for Students Policy and Procedures.

Existing Staff
All existing RNN Group staff and agency staff will be subject to renewed DBS checks every 3 years unless they are subscribed to the DBS Update Service. It is the responsibility of all staff to disclose any criminal convictions that

are incurred during their employment. Failure to do so will be considered a disciplinary offence and in some circumstances may lead to dismissal. Agency staff will not be allowed unsupervised access to children under the age of 18 or students with support and care needs unless they have had a DBS check at an enhanced level within 12 months. Contractors will not be allowed unsupervised access to children under the age of 18 or students with support and care needs unless they have had a DBS check at an enhanced level.   Access to RNN Group premises will be restricted and adequate supervision maintained.

35. Managing Allegations against Staff & Volunteers
The RNN Group aim is to provide a safe and supportive environment, however it recognises that sometimes the behaviour of staff and volunteers may lead to concerns being raised or an allegation of abuse being made. Allegations may arise from differing understandings of the same event, but when they occur they are distressing and difficult for all concerned.   The RNN Group recognises that many allegations are genuine and that there may be some staff and volunteers who may deliberately seek to harm or abuse children.   This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:
 • behaved in a way that has harmed a child, or may have harmed a child;
 • possibly committed a criminal offence against or related to a child;
 • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 • behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The RNN Group will take all possible steps to safeguard students and to ensure that staff and volunteers are safe to work with children. The RNN Group will ensure that the procedures outlined in Local Safeguarding Partnership Child Protection Procedures and Part 4 of the statutory guidance 'Keeping Children Safe in Education' are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO is a statutory post appointed by the Local Authority who is responsible for coordinating the response to concerns that an adult who works with children may have caused or could cause harm to children.

If an allegation is made or information is received about an adult who works in RNN Group environments which indicates they may be unsuitable to work with children, the member of staff receiving the information should inform the DSL immediately. This would also include where relationships and 'associations' that staff have in learning environments and outside (including online) may have an implication for the safeguarding of children and vulnerable adults in RNN Group learning environments. Should an allegation be made against the Chief Executive & Principal or DSL, this will be reported to the Chair of Governors. The DSL or Chair of Governors will seek advice from the LADO within one working day and will ensure that they take part in further information gathering, discussions and allegation meetings as required by the LADO. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the DSL or Chair of Governors should contact the LADO via MASH on Rotherham: 01709 336080, or Nottinghamshire LADO01158041272 (or for strategic issues 0115 9773921).

The RNN Group has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person and if these circumstances arise in relation to a member of staff within the RNN Group learning environments, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. If this should happen the RNN Group will ensure that at the conclusion of a case a review procedures and/or practice takes place to help prevent similar events happening in the future.

36. Training
All RNN Group staff will receive training to familiarise them with child protection and safeguarding issues and responsibilities and RNN Group policies and procedures to ensure that:

- *All newly recruited staff have a clear understanding of their role and responsibilities in safeguarding children and young people, including online safety and are aware of the associated procedures;*
- *All SLT and the designated governor are familiar with their role and responsibilities;*
- *All staff are aware of their role and responsibilities and receive guidance on how to deal with suspicions or disclosures of abuse;*
- *All staff are aware of the signs of abuse and neglect and how to refer/seek help, that they understand they must question the behaviour of children and parents/carers and don't necessarily take what they are told at face value;*
- *All staff, including designated safeguarding staff, must renew their safeguarding training every 2 years.*
- The training is regularly updated.
- All staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

37. Procedures for Managing Concerns

It is the duty by law that any member of RNN Group staff, volunteer or visitor who receives a disclosure of abuse, or suspects that abuse may have occurred, should report it to a member of the safeguarding team. If a member of the team cannot be found then the matter should be brought to the attention of the most senior member of staff.

Concerns must be logged on Promonitor in the Welfare/ confidential section. The appropriate level should be used to record the information and the safeguarding team should be included in the comment.

If appropriate, the member of the Safeguarding Team will refer cases of suspected abuse or allegations to the Multi Agency Safeguarding Hub Team (MASH) by telephone in accordance with the Local Safeguarding Boards' Procedures. This telephone referral will be confirmed in writing (using the Multi Agency Referral Form) within 48 hours. In some cases, it may be appropriate for the Police to also be contacted. In the case of peer on peer abuse the policy and procedures relating to student behaviour and discipline will also be followed.

It is not the responsibility of RNN Group staff to investigate allegations; this is the responsibility of the Authorities. However, essential information may help these investigations and details such as student's name, address, and date of birth, family composition, and reason for referral should be recorded. The name of the person who initially received the disclosure and whether or not the parents/carers of the student are aware of the referral should also be included.

For students who are in immediate danger or risk of harm a referral should be made to social care and/or the police immediately. Anyone can make a referral but in situations where referrals are not made by the DSL they should be informed as soon as possible afterwards that a referral has been made by someone else. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing using ProMonitor and OneFile and stored securely within students' safeguarding and child protection files. All referrals will be in line with local safeguarding children's board procedures. If, after a referral, the child's situation does not appear to be improving, the RNN Group will consider following the LSCB escalation procedures to ensure concerns have been addressed and, most importantly, that the child's situation improves. Support from the Designated Safeguarding Team will be made available for staff dealing with safeguarding issues.

RNN Group staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with MASH, or the police, if the situation is an emergency and the DSL, their deputy and the safeguarding team are all unavailable and they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff who does not feel that concerns have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Chair of Governors or Chief Executive & Principal. If any member of staff does not feel the situation has been addressed appropriately at this point should contact the MASH directly with their concerns.

Where there are concerns about the way that safeguarding is carried out within RNN, staff should refer to the RNN Whistleblowing Policy.

38. Professional Confidentiality
A member of staff must never agree with a student to keep information confidential and where there is a safeguarding concern this must be reported to a member of the safeguarding team and may require further investigation by the appropriate authorities. Staff will be informed of relevant information in respect of individual cases on a 'need to know bases only. Any information shared with a member of staff in this way must be held confidentially by themselves.

39. Records & Monitoring
The RNN Group maintains up to date and accurate records of all students cause for concerns including an indication of the status of each individual case and when it is deemed appropriate to pass this information to other agencies. Members of staff receiving a disclosure of, or noticing signs of abuse, should use Promonitor to record these concerns as accurately and as quickly as possible. These forms should be passed to a member of the safeguarding team and will be kept securely in a confidential cabinet in the room used by the safeguarding officer. A confidential database accessible only by safeguarding team members is kept up to date and monitors the RNN Group's case load. This database also provides statistics that help to inform the nature of support and where extra resources may be needed by students.

40. Visitors to the Group premises
The RNN Group have a signing procedure to ensure that all visitors are known and aware of the college safeguarding procedures. Electronic sign in systems are used at our main sites, supported by QR codes or paper records at our satellite buildings. All staff have a responsibility to ensure that visitors are accompanied once on site and to challenge anyone not wearing a visitor's lanyard. Wherever possible, visits to site should be pre-arranged and visitors must report to reception in the first instance.

Appendix 1: Related Policies & Procedures

Key RNN policies, procedures and action plans that contribute to the overarching Safeguarding for All Policy are listed below. Each of these policies addresses the RNN Group strategy and operations relating to key activities and safeguarding provision. Key policies can be found on RNN Group websites and the staff portal.

Student Code of Conduct
Student Attendance and Punctuality
RNN Group Visitors Guidelines
Feedback and Complaints
Behaviour and intervention policy
Freedom of Speech Policy
Grievance Policy and Procedure
Health & Safety Policy
Security Policy
Staff AUP
Learner AUP
Health and Wellbeing Policy
Student Counselling Policy
Lone Workers Policy (Estates)
Modern Slavery Policy
Preventing Hidden Labour
Anti-Slavery and Human Trafficking statement
SEND Policy
Prevent Action Plan
Recruitment and Selection Policy
Guidance for use of the Reflection Room

Inclusion Policy (referring to Single Equality Scheme Duty
Whistleblowing Policy and Procedures
Safeguarding Training pack

Statutory Framework

RNN Group operates its Safeguarding for All Policy through its acknowledgement and acceptance of its responsibilities set out in the following legislation and guidance:
- *'Working Together to Safeguard Children' DfE (2018)*
- *'Keeping Children Safe in Education' DfE (2022)*
- *'Keeping Children Safe in Education' DfE (2022) - Part One ALL staff.*
- *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018*
- *'What to do if you're worried a child is being abused?' NSPCC*
- *Children's Act Section 11 (1989, 2004, 2008 and 2014)*
- *Special Educational Needs and Disability Code of Practice 201*
- *SEND: guide for early years settings*
- *SEND: guide for further education providers*
- *Early Help Assessment*
- *Children, Schools and Families Act (2010, 2014),*
- *Education Act (2002, 2011)*
- *Education and Inspections Act 2006*
- *Care Act (2014) and*
- *other associated legislation and guidance.*

Furthermore, safeguarding and promoting the welfare of children, young people and people with care and support needs will be undertaken with due regard to Local safeguarding children's boards procedures and government and external agencies guidance:

Rotherham Safeguarding Children's Board (RSCB) Procedures https://www.proceduresonline.com/rotherham/scb/

Nottinghamshire Safeguarding Children's Partnership
https://www.nottinghamshire.gov.uk/nscp

What to do if you're worried a child is being abused (March 2015)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

'Working together to Safeguard children' (July 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

'Keeping Children Safe in Education (September 2022)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1077101/KCSIE_2022.pdf

Safeguarding Vulnerable Groups Act 2006
https://www.legislation.gov.uk/ukpga/2006/47/contents

Care Act factsheet
https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets

When to call the police
https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf

Criminal Exploitation of children and vulnerable adults: County Lines guidance
https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

Data Protection Act (2018) overview
https://www.gov.uk/government/publications/data-protection-act-2018-overview

Guide to the General Data protection Regulation (May 2018)
https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation

Information Sharing (July 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

No Secrets (January 2015) protecting vulnerable adults in care
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/194272/No_secrets__guidance_on_developing_and_implementing_multi-agency_policies_and_procedures_to_protect_vulnerable_adults_from_abuse.pdf

The Prevent Duty (March 2016) for further education institutions
 https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales

The Prevent Duty for Higher Education Institutes
https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales

Channel Duty Guidance (April 2015)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

Female Genital Mutilation http://rotherhamscb.proceduresonline.com/chapters/p_fem_gen_mut.html

Safeguarding children and young people from sexual exploitation
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf

Rotherham Safeguarding Adults Board
http://www.rsab.org.uk/

Forced Marriage Unit of the Foreign and Commonwealth Office
http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/

What is forced marriage in the LGBT community?
https://www.gov.uk/government/publications/what-is-forced-marriage-in-the-lgbt-community

NSPCC
www.nspcc.org.uk

Jisc User Safety Briefing http://www.jisc.ac.uk/publications/briefingpapers/2005/pub_usersafetybp.aspx

National Domestic Violence Helpline http://www.nationaldomesticviolencehelpline.org.uk

Online abuse Legislation, policy and practice https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/legislation-policy-practice/

Child Exploitation and Online Protection Centre (CEOP)
www.ceop.police.uk

Women's Aid
https://www.womensaid.org.uk/

Apna Haq support for Asian Women
http://www.apnahaq.org.uk/about-us/about-apna-haq/

Karma Nirvana – Support for victims of honour crimes/ forced marriage
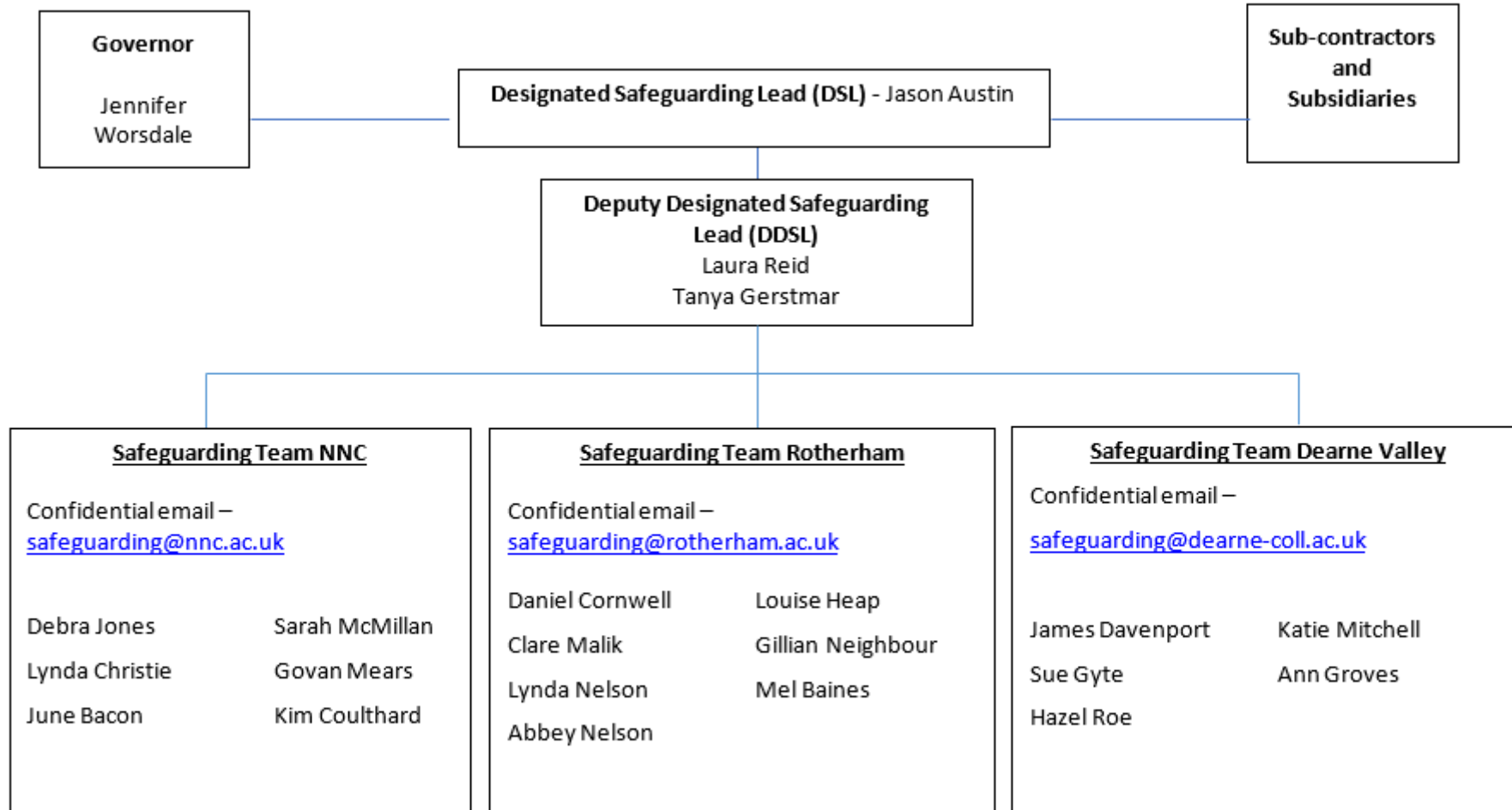www.karmanirvana.org.uk

Private Fostering
http://www.privatefostering.org.uk/

Disqualification by Association (September 2018)
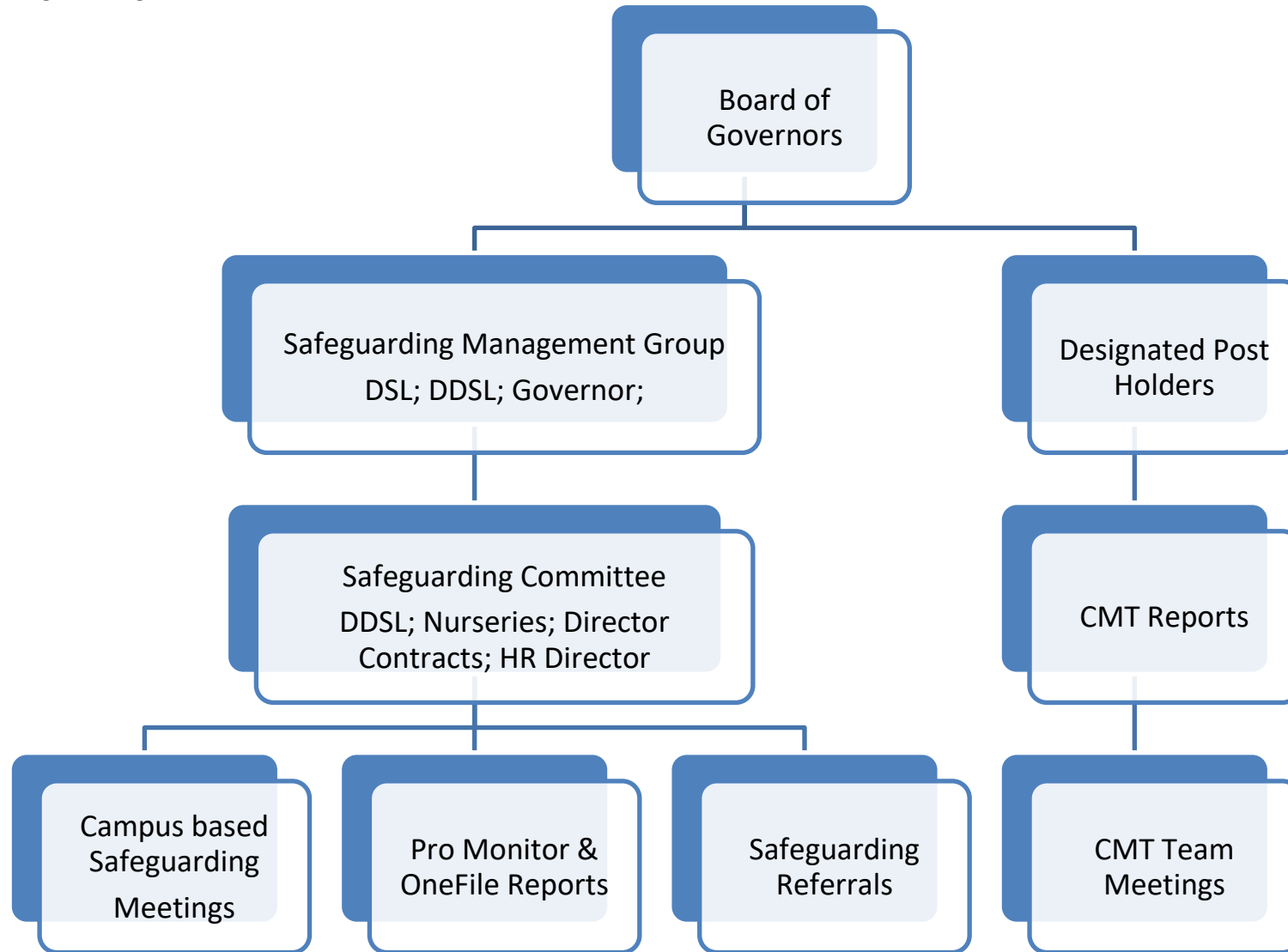https://www.safeguardinginschools.co.uk/disqualification-by-association-september-2018/

The designated teacher for looked after and previously looked-after children Statutory guidance on their roles and responsibilities
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf

Appendix 2: Safeguarding Team Structure

RNN Safeguarding Team

Governor

Jennifer Worsdale

Designated Safeguarding Lead (DSL) - Jason Austin

Sub-contractors and Subsidiaries

Deputy Designated Safeguarding Lead (DDSL)
Laura Reid
Tanya Gerstmar

Safeguarding Team NNC

Confidential email –
safeguarding@nnc.ac.uk

Debra Jones   Sarah McMillan

Lynda Christie   Govan Mears

June Bacon   Kim Coulthard

Safeguarding Team Rotherham

Confidential email –
safeguarding@rotherham.ac.uk

Daniel Cornwell   Louise Heap

Clare Malik   Gillian Neighbour

Lynda Nelson   Mel Baines

Abbey Nelson

Safeguarding Team Dearne Valley

Confidential email –
safeguarding@dearne-coll.ac.uk

James Davenport   Katie Mitchell

Sue Gyte   Ann Groves

Hazel Roe

Appendix 3: Safeguarding Meetings/Communications Structure

Appendix 4: Procedure for Responding to a Concern and Report of a Missing Student

1. Introduction

1.1 Purpose of Procedure To explain how the RNN Group ascertains whether a student is missing and if so, what action should be taken.

1.2 Scope all students in the Group

1.3 Roles and Responsibilities all students should be aware that they are expected to comply with organisation attendance requirements outlined in the Group Student Attendance Monitoring Process. Therefore, students should advise and seek permission from their department in advance of any planned or prolonged absences. This requirement should be reinforced through induction activities and student handbooks.

Staff attendance monitoring responsibilities. All staff should play an active role in monitoring the attendance and wellbeing of students in their care, and should report any concerning absences to their **Designated Safeguarding Team** without delay. Staff should detail as much as possible their reason for concern and provide any evidence for this.

2. Procedure

2.1 The Designated Safeguarding Team will investigate absence. Any unplanned absences that are of concern or of more than two weeks, should be immediately investigated (without raising undue alarm) at the local level. This may include emailing, telephoning and writing to the student, as well as contacting the student's friends, fellow students, reviewing social media activity etc. At this stage, this should not include contacting parents, emergency contacts or other third parties external to the organisation

2.2 If these local enquiries fail to locate the student, further attempts to locate the student and assess the possible level of risk involved. This may include establishing last known contacts and whether the student evidenced any unusual patterns of behaviour. If the Designated Safeguarding Team considers there to be grounds for concern about the student's wellbeing s/he will use one of the emergency contact numbers to contact family/friends/responsible adult.

2.3 If, as a result of these enquiries, the location and wellbeing of the student cannot be confirmed, the Designated Safeguarding Lead will then report the student as missing to the Police, and become the main point of contact for the Police. The Designated Safeguarding Lead will inform the Principal/Chief Executive.

2.4 Support the found students. Once the student has been located and their safety and general wellbeing ensured, the Designated Safeguarding Team will provide help to address any underlying difficulties and concerns.

Appendix 5: Procedure for managing Peer on Peer Abuse
(including bullying, cyber-bullying, sexting, sexual violence, up skirting and sexual harassment)

1.   Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of abuse from peers including through bullying, cyber-bullying and sexting.

Keeping Children Safe in Education 2022 has changed its terminology to 'child on child' abuse, however the RNN Group, due to the age of its learners will refer to this abuse as 'peer on peer'.

2.   Definitions

The key terms in this document are defined as:

- Peer: A person of similar age
- Child: Those under the age of eighteen
- Vulnerable Adult: For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk
- Education and Health Care Plan (EHCP): From September 2014 EHCPs began to replace Statements of special educational needs and Learning Difficulty Assessments from those under the age of 25. An EHCP outlines information about the person including how they communicate, what support they need and what they would like to achieve
- Bullying: Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes any repeated words or actions, which are aimed at causing someone to feel frightened, miserable and helpless. Bullying can take many forms, including:
  - Verbal: e.g. name calling, sarcasm, threatening and teasing
  - Physical: e.g. pushing, hitting, kicking, punching or any use of physical aggressive contact
  - Social: e.g. ignoring, spreading rumours or treating someone like an outsider
  - Psychological: e.g. stalking and intimidation
- Cyber-bullying: 'Virtual' bullying using technology (e.g. chat rooms, instant messaging, email and mobile phone) which can occur in or outside College. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily. See Appendix E, online safety.
- Sexting: Whilst professionals refer to the issue as 'sexting' there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating and sharing sexual photos and videos of under-18s, including selfies, is illegal.
- Sexual misconduct: relates to all unwanted conduct of a sexual nature. This includes, but is not limited to: i. Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010) ii. Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2010) iii. Assault (as defined by the Sexual Offences Act 2003) iv. Rape (as defined by the Sexual Offences Act 2003) v. Physical unwanted sexual advances (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)2 vi. Intimidation, or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)3 vii. Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015)

- Harassment: Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners
- Up skirting: Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Since April 2019 Up skirting has been a criminal offence - Under the Voyeurism Act, up skirting offenders can now be arrested, face up to 2 years in prison and have their name placed on the sex offenders register if caught up skirting. This includes instances where culprits say the images were taken "just for a laugh".
  - Sexual Harassment: Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:
  - Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - Sexual "jokes" or taunting;
  - Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (college should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
  - Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media; Sexual exploitation; coercion and threats.
  - Sexual Violence: Under the Sexual Offences Act 2003 sexual violence is described as:
  - Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
  - Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
  - Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
- A child under the age of 13 can never consent to any sexual activity

- The age of consent is 16
- Sexual intercourse without consent is rape.

3.   External guidance

Peer on peer abuse can take many forms including physical, sexual (e.g. inappropriate touching) and emotional abuse (including bullying). Department for Education (DfE) September 2022: Keeping Children Safe in Education; statutory guidance for schools and colleges, makes it clear that abuse is abuse and should never be tolerated or passed off as 'banter' or part of 'growing up.'

The Equality Act 2010 replaced previous anti-discrimination laws with a single Act. A key provision was a new public sector Equality Duty, which came into force on 5 April 2011. This requires the College to:
- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

Peer on peer abuse often involves an imbalance of power between the perpetrator and the victim, can include intimate relationships between peers; could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

Bullying (including cyber-bullying) can be involved in any type of abuse and is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBT), those from minority ethnic groups, or those with disabilities and/or learning difficulties can be more vulnerable to this form of abuse and the College takes it duty to protect more vulnerable learners very seriously.

Peer on peer abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to a Designated/ Deputy Designated Safeguarding Lead (DSL/ DDSL).

4.   Actions

The following actions must be taken by all staff:
- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken
- Staff must ensure ground rules are set in induction and that learners are made aware of the importance of adhering to fundamental British values, what constitutes abuse (including bullying and cyber-bullying) and how any incidents of abuse will be addressed through the Student Behaviour and Intervention Procedure
- Curriculum Team Leaders/Course Tutors/ Progress Tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe from abuse through the mandatory tutorial programme

- Staff receiving reports of abuse, including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the Student Behaviour and Intervention Procedure. Sanctions against perpetrators may include suspension whilst an investigation takes place and permanent exclusion
- Staff must ensure appropriate Curriculum Managers are notified. This includes the Head of Student Support and Safeguarding for a learner who is under the age of 16 (e.g. Y10/11 equivalent at the start of the academic year) and the Head for SEND and High Needs for a learner under the age of 25 who is in receipt of an EHCP and/or high needs funding
- All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and refer those involved for additional support from the student support team as appropriate. All concerns must be referred to a DDSL/ Safeguarding team following the safeguarding for all staff procedure (appendix 3).
- The Student Support Team and/or DDSL will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police as although some types of abuse (e.g. bullying) may not be a specific criminal offence in the UK, some types of harassing or threatening behaviour could be a criminal offence (e.g. under the Protection from Harassment Act 1997)
- All allegations/incidents must be recorded on Promonitor and learners involved told what is being recorded, in what context, and why
- Any incident of abuse must be discussed with the learners' parents/carers for under 18s and where appropriate for those under the age of 25 with an EHCP and/or in receipt of high needs funding, and with the appropriate school where appropriate (for Y10/Y11s) by the Head of Student Support and Safeguarding. An agreement must be reached as to what action should be taken subject to compliance with the Student Behaviour And Intervention Procedure

Advice for Deputy Designated Safeguarding Leads where sexual violence occurs
- The victim may ask the college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The designated safeguarding lead (or a deputy) should consider the following:
- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Local Authority Children's Social Care;
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

5.	Useful contacts
- NSPCC Helpline 0808 800 5000
- NSPCC Harmful Sexual Behaviour
- ChildLine 0800 500 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org

- Bullying UK www.bullyinguk.org.uk
- Brook Sexual Behaviours Traffic Light Tool

Appendix 6: Definition & Terms

Children and Young Persons/People
In terms of this policy, "child, children and young people" mean those under the age of 18 as Defined by The Children Act 1989. This policy applies to students in this age group attending a further education course and young people aged 14 –16 who attend college as part of a school links course. Student. The term 'student' for this policy covers all individuals who study within the Group or at any of the outreach/ community centres. The policy also covers those students who are on placement as part of their course and school links students. In addition, it covers students visiting the College or on tasters.

Vulnerable Adults
A vulnerable adult is a person aged 18 years or over who may be unable (permanently or temporarily) to take care of themselves or protect themselves from harm or from being exploited and may include a person who:
- *Is elderly and frail;*
- *Has a mental illness including dementia;*
- *Has a physical or sensory disability;*
- *Has a learning disability;*
- *Has a severe physical illness;*
- *Is a substance misuser; and/or*
- *Is homeless.*

Abuse
Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated. Abuse may fall into a number of categories: - physical abuse, sexual abuse, emotional abuse and neglect.   Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. 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*. Abuse can be, but is not limited to:

- *Physical;*
- *Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition;*
- *Sexual;*
- *Financial;*
- *Psychological/emotional (including the use of text, social networks and email)*
- *Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions*
- *Institutional e.g. failure to provide a choice of meals or failure to ensure privacy or dignity; or*
- *Discriminatory in nature e.g. racial, sexual or religious harassment.*

In the case of vulnerable adults it may also include:

- *physical abuse such as pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment; and*
- *financial abuse such as exerting improper pressure to sign over money from pensions or savings etc.*
- *Exposure to extremist behaviours and attempts to radicalise*

Victim
It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

Alleged perpetrator(s)and where appropriate perpetrator(s)
These are widely used and recognised terms and the most appropriate to aid effective drafting of guidance. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

The RNN Group will provide a link, via websites, to the Local Authority Safeguarding Children's Board websites which provide more information on all categories of abuse and safeguarding issues. Specific safeguarding issues are:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Both CSE and CCE 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 Sexual Exploitation (CSE)
CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can occur through the use of technology.

CSE can occur in all communities and amongst all social and ethnic groups and can affect girls and boys. Very young children can also be affected or targeted, particularly in relation to online concerns. CSE is a complex form of abuse and it can be difficult for those working with children to identify and assess; however, all RNN staff are made aware of the potential indicators of grooming and exploitation and how to refer concerns on appropriately. Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;

- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.
The CSE indicators can also be indicators of CCE

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Child on child/ Peer on peer

Keeping Children Safe in Education (2022) have changed their terminology to child on child rather than peer on peer, which could suggest the victim and preparator are of the same or similar age, which is not always the case. Due to the age range at the RNN Group Peer on Peer will be the terminology used as it is more inclusive for all learners. Peer on peer abuse occurs when a person is exploited, bullied and / or harmed by their peers who are the same or similar age. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim.

Staff should recognise that learner are capable of abusing their peers, should not be tolerated or passed off as "banter" or "part of growing up". All staff are aware that safeguarding issues can manifest themselves via peer on peer abuse which is likely to include such things as:

- *Bullying, including online/cyber bullying and prejudice-based bullying;*
- *Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;*
- *Sexual violence and sexual harassment – Part 5 of Keeping Children Safe in Education gives guidance to schools and colleges on how to manage reports of child on child sexual violence and sexual harassment;*

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- *upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;*
- *Sexting (also known as 'youth produced sexual imagery');*
- *Initiation (sometimes referred to as 'hazing') type violence and rituals/gang activity;*

All RNN Group staff are clear about the action to take where concerns about peer on peer abuse arise and all staff will always reassure victims that they are being taken seriously and that they will be supported and kept safe. The RNN Group recognises that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the RNN's Student Behaviour and Disciplinary Procedures.

In cases of 'sexting', the RNN Group follows guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation
Female Genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK and typically takes place between birth and around 15 years old. The RNN Group is aware of the common risk factors for FGM which include:
- *Low level of integration into UK society;*
- *Mother or a sister who has undergone FGM;*
- *Girls who are withdrawn from PSHE/undertaking physical activities;*
- *Visiting female elder from the country of origin;*
- *Being taken on a long holiday to the country of origin;*
- *Talk about a 'special' procedure to become a woman;*

FGM may be likely if there is a visiting female elder, if there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of the learning environment to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. FGM is addressed as part of the procedures around 'Honour Based Violence' which is defined as "crimes which have been committed to protect and defend the honour of the family and/or the community, including FGM, Forced Marriage and practices such as Breast Ironing"

The RNN Group has due regard to the mandatory reporting duty, which came into force in October 2015 (Serious Crime Act), of the FGM Act 2003, which places a statutory duty on teachers (along with social workers and healthcare professionals) to report to the police where they discover that

FGM appears to have been carried out on a girl under 18 years. Staff will be vigilant and will report promptly any FGM or other Honour Based Violence concerns to the Designated Safeguarding Lead.

Forced Marriage, Arranged Marriage, Marriage of Convenience
A marriage must be entered into with the full and free consent of both people. The two people involved should feel that they have a choice. With forced marriage, one or both of the people involved are forced into a marriage against their will and without their permission. An arranged marriage is not the same as a forced marriage. In an arranged or assisted marriage, the families take a role in choosing and introducing the marriage partners. The marriage is entered into freely by both people. people from the LGBTQ community may decide to enter a marriage of convenience. This is not the same as a forced marriage. A marriage of convenience is when both partners enter freely into a marriage that is mutually beneficial. Reasons for a marriage of convenience vary, but they often include issues of sexuality and immigration.
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Domestic abuse
The cross-government definition of domestic violence and abuse is: 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, well-being, development, and ability to learn.

Operation Encompass
Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

Private Fostering
A Private Fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Further definitions can be found in Keeping Children Safe in Education, Annex A (September 2022)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1077101/KCSIE_2022.pdf

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