

|                                 |                      |
|---------------------------------|----------------------|
| Policy/Strategy/Procedure Title | Safeguarding For All |
| Date completed                  | April 2020           |
| Who owns this document          | Laura Reid           |
| Date impact assessed            | 23/4/2020            |
| Date for renewal                | April 2021           |
| Date approved by Board          |                      |

### Key contacts

| Role   | Name   | Contact details   |
|--|--|---|
| Designated Safeguarding Lead (DSL) - Group   | Jason Austin<br>CEO and Principal                                      | <a href="mailto:jaustin@rnngroup.ac.uk">jaustin@rnngroup.ac.uk</a><br>T: 01709 513333 Ext 1401<br>M: 07908827416    |
| Deputy Designated Safeguarding Lead (DDSL)   | Angela Bates<br>Assistant Principal – Student Support and Safeguarding | <a href="mailto:Angela.bates@rnngroup.ac.uk">Angela.bates@rnngroup.ac.uk</a><br>T: 01909504731<br>M: 07890543473    |
| Deputy Designated Safeguarding Lead (DDSL)   | Laura Reid<br>Head of Student Support and Safeguarding                 | <a href="mailto:lreid@rnngroup.ac.uk">lreid@rnngroup.ac.uk</a><br>T: 01709722747<br>M: 07946027955                  |
| Deputy Designated Safeguarding Lead (DDSL)   | Tanya Gerstmar<br>Head of SEND and High Needs                          | <a href="mailto:tgerstmar@rnngroup.ac.uk">tgerstmar@rnngroup.ac.uk</a><br>T: 01709513333 Ext 1021<br>M: 07805762882 |
| Designated Teacher for Looked After Children | June Bacon<br>Designated LAC Lead                                      | <a href="mailto:jbacon@rnngroup.ac.uk">jbacon@rnngroup.ac.uk</a><br>T: 01709722844 M:<br>07969920279                |
| Named Safeguarding Governor                  | Catherine Burn<br>Governor & Director of BCVS                          | <a href="mailto:director@bcvs.org.uk">director@bcvs.org.uk</a><br>T: 01909 476118 x22<br>M: 07951098701             |

## Table of Contents

| No | Content   | Number |
|----|---|--------|
| 1  | Scope of policy   | 3      |
| 2  | Policy Consultation & Review                                    | 3      |
| 3  | Purpose & Aims  | 3      |
| 4  | Policy Amendments   | 4      |
| 5  | Working in Partnerships   | 4      |
| 6  | Roles & Responsibilities  | 5      |
| 7  | Reporting Structures  | 10     |
| 8  | Supporting Students at Risk                                     | 10     |
| 9  | Children with Special Educational Needs and Disabilities (SEND) | 10     |
| 10 | Mental Capacity   | 11     |
| 11 | Looked after Children and Previously Looked After Children      | 11     |
| 12 | Children or Young People Missing in Education                   | 11     |
| 13 | Early Help & Support for Children in Need                       | 11     |
| 14 | Abuse through Electronic Communication                          | 12     |
| 15 | Online Safety   | 12     |
| 16 | Harassment  | 12     |
| 17 | Hate Crime  | 12     |
| 18 | LGBTQ   | 12     |
| 19 | Criminal Exploitation of Children (county lines)                | 13     |
| 20 | Organised Crime Groups  | 13     |
| 21 | Preventing Radicalisation and Extremism (Prevent Duty)          | 13     |
| 22 | 16-19 Study Progress/Adult Entry                                | 14     |
| 23 | Working with Parents & Carers                                   | 14     |
| 24 | The Child's wishes  | 14     |
| 25 | Safer Recruitment   | 15     |
| 26 | Staff Conduct & the use of 'Reasonable Force'                   | 15     |
| 27 | Disclosure & Barring Service                                    | 16     |
| 28 | Managing Allegations against Staff & Volunteers                 | 16     |
| 29 | Training  | 17     |
| 30 | Procedures for Managing Concerns                                | 17     |
| 31 | Professional Confidentiality                                    | 18     |
| 32 | Records and monitoring  | 18     |

Appendix 1: Related Policies & Procedures

Appendix 2: Safeguarding Team Structure

Appendix 3: Safeguarding Meetings/Communications Structure

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

Appendix 5: Definition & Terms

**1. Scope of policy:** *All students, staff, contractors and visitors*

## **2. 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 and Early Years Settings. Reference to 'students' within this policy refers to 16-18 year old students, adults and apprentices.

This policy is the overarching Safeguarding Policy for all RNN employed staff, organisations, Early Years Settings, stakeholders, volunteers, associates and visitors within its accountability and responsibility. Early Years settings will create and review specific policies in line with the safeguarding requirements outlined in the statutory framework for the early year's foundation stage.

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 and volunteers) at induction alongside the Staff Code of Conduct. All RNN Group employed staff are provided with Part One and Annex A of the statutory guidance '*Keeping Children Safe in Education*', DfE (reissued September 19).

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

## **3. 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;*
- *Identifies those who are suffering, or likely to suffer, harm;*
- *Takes appropriate action to see that everyone is kept safe, on site at all Group sites and related activities.*

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 18<sup>th</sup> birthday who need continuing services and support, this can be extended to their 25<sup>th</sup> 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.

#### **4. Policy Amendments**

##### **Keeping Children Safe in Education (KCSIE)**

The Department for Education has recently made amendments to KCSIE 2019 and republished the guidance to take into account 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)**

GDPR came into force in May 2018 and along with the it, the Data Protection Act 2018. Reference to this new legislation is included in Keeping Children Safe in Education (2019). Neither GDPR nor the Data Protection Act 2018 prevents or limits the sharing of information to keep children safe. Paragraph 77 sets out the “Special Category Personal Data,” which allows sharing information even without consent, in some circumstances.

##### **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

##### **Disqualification under the Childcare Act 2006**

Changes to Disqualification under the Childcare Act 2006, has been amended by the Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulation 2018. This new legislation came into force in August 2018. Historically, staff providing child care could, in certain circumstances, be prohibited from working with children because of the convictions made by someone who lives in their household. This is no longer the case. Disqualification by Association now only applies in domestic premises, not to schools or Colleges. However, staff working in child care may still be disqualified because of offences committed by themselves.

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

In line with the guidance from Disqualification by Association 2006 (as amended) and Keeping Children Safe in Education 2019 all staff will be reminded, not just those working with under-8s, that their ‘relationships and associations’ (including online) may have an implication for the safeguarding of students, and if there are concerns about that, the RNN Group should be told and the information recorded on the Single Central record or elsewhere.

#### **5. 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 will assist local authorities to exercise statutory functions. 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 to 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 work in partnership with the Safeguarding Boards and attend the local FE Colleges' Safeguarding Forums.

## **6. Roles & Responsibilities**

All those working with or on behalf of children or vulnerable adults have a responsibility to protect them. The RNN Group has appointed key people who have specific safeguarding responsibilities and constitute the organisation's designated safeguarding team.

**Board of Governors** is 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 2019', Local Authority advice and the requirements of the Local Safeguarding Children Board (LSCB) policies and procedures;*
- *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 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 a safeguarding induction and are provided with a copy of this policy, Part One of 'Keeping Children Safe in Education 2019' and 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 2019 and local authority/LSCB guidance;*
- *Safer recruitment practices are followed in accordance with Part Three of 'Keeping Children Safe in Education' (2019);*
- *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:**

- *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;*
- *Recruiting and vetting of staff and other relevant individuals within the RNN Group, including DBS checks;*
- *Ensuring that the RNN Group has procedures and policies which are consistent with the local Safeguarding Boards procedures and Prevent duty;*
- *Supporting and assisting staff or students to make referrals;*
- *Receiving and processing concerns related to the behaviour of staff;*
- *Developing the Staff Code of Conduct;*
- *Raising awareness within safeguarding practice to prevent radicalisation of students and compliance with the 'Prevent' duty*
- *Monitoring and organising safeguarding and Prevent training;*
- *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;*
- *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 sub-contractors;*

- *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;*
- *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** has responsibility at a strategic level for:

- *Maintaining the Single Central Record;*
- *Corporate induction processes;*
- *Coordination of safeguarding related training for all staff;*
- *The safe recruitment/employment of all staff and the safe use of contractors.*

**Company Secretary and Director of Estates and IT** has responsibility at a strategic level for:

- *Health & Safety;*
- *Risk assessments;*
- *First Aid Procedures;*
- *Estates and IT.*

**Deputy Designated Safeguarding Leads** are responsible for:

- *Ensuring all staff understand the symptoms of child abuse and neglect;*
- *Ensuring processes are in place for referring concerns to social care;*
- *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.*

**Early Years Managers** are responsible for:

- *Ensuring that parents of children within Early Years settings are aware of this Safeguarding Policy;*
- *Maintaining policies and procedures relating to Early Years Foundation;*
- *Monitoring children who are the subject of Child Protection and Child in Need Plans;*
- *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 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, including Early Help assessments.*

**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;*
- *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;*
- *Encouraging students to respect each other and their differences, including with regard to protected characteristics outlined in the Equality Act 2010;*
- *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.*



**School Partnerships 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.*

**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 DSL (or other appropriate SLT member), Governor and include enough senior members of staff to ensure appropriate resource is allocated to safeguarding and equality & diversity.

### **7. 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.

### **8. 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;*
- *School liaison and references;*
- *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;*
- *Partner referral.*

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;*
- *A 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 liaison 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 and Early Help 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 circumstance, 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 visit can only be carried out with two members of staff present.*

### **9. 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 2019, the NSPCC document 'We have the right to be safe – Protecting disabled children from abuse' (October 14).

### **10. 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.

### **11. Looked after Children and Previously Looked After Children**

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 LAC students and previously LAC students safe. The RNN Group has a named 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.

### **12. 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 contacts 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.

### **13. Early Help & Support for Children in Need**

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 anti-social 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.*

### **14. 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.

### **15. Online Safety**

The RNN Group ensure 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. 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 and extremist views;*
- *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.*

### **16. 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.

## **17. 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*

## **18. 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.

## **19. Criminal Exploitation of Children (county lines)**

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.

## **20. Organise Crime Groups**

An OCG is defined as a group which:

- has as 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

## **21. 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 ie, 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 be in need of 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 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.

## **22. 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.

## **23. 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 two in order to be able to make contact with 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.

#### **24. The Learner's Wishes**

Where there is a safeguarding concern the child or young person or vulnerable adult's wishes and feelings will be taken into account 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.

#### **25. 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 2019'. 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 (as per the School Staffing (England) Regulations 2009). The RNN Group takes advice from LSCB about safe recruitment training opportunities to remain 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 2019 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 and prohibition checks (for teaching posts), 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 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;*
- *Any other relevant information we feel should be included on the SCR such as volunteers, childcare disqualification, safeguarding and safer recruitment training records etc.*

The RNN Group has risked 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 the Disclosure and Barring Service (DBS) in line with the Group’s safe 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’ and ‘Safeguarding Checks Policy’ give 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.

### **26. Staff Conduct & 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 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 Staff will be trained in how to use reasonable force and are authorised 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.

### **27. Disclosure & Barring Service**

#### **New Staff & Volunteer Workers**

All new RNN Group staff 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 teaching staff who does 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. A risk assessment must be undertaken and agreed by a member of SLT on every occasion before the member of staff can commence employment. 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 will be subject to renewed DBS checks every 3 years and subscription 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.

### **28. 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 but that there may be some staff and volunteers who may deliberately seek to harm or abuse 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 Children Board Child Protection Procedures and Part 4 of the statutory guidance 'Keeping Children Safe in Education' (2019) 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 co-ordinating 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 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 Bassetlaw: 0300 500 80 90 or Nottinghamshire LADO Eva Callaghan 01158041272 for Early Years Settings.

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 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.

### **29. 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 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;*
- *Members of staff must renew their training every 3 years and designated safeguarding staff every 2 years;*

### **30. 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.

Written disclosures need to be recorded on a 'Safeguarding Referral Form' which can be found on the safeguarding section of the staff portal. This form can be emailed to the confidential address for the appropriate campus [safeguarding@rotherham.ac.uk](mailto:safeguarding@rotherham.ac.uk) , [safeguarding@dearne-coll.ac.uk](mailto:safeguarding@dearne-coll.ac.uk) or [safeguarding@nnc.ac.uk](mailto:safeguarding@nnc.ac.uk).

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.

### **31. 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.

### **32. 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 the RNN Group's safeguarding referral form 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.

## **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 Attendance and Punctuality Policy

Student Code of Conduct

Feedback and Complaints

Safeguarding Checks Policy

Code of Conduct

Freedom of Speech Policy

Grievance Policy and Procedure

Health & Safety Policy

Staff AUP

Learner AUP

Health and Wellbeing Policy

Student Counselling Policy

Lone Workers Policy (Estates)

Preventing Hidden Labour

Anti Slavery and Human Trafficking statement

SEND Policy

Prevent Action Plan

Recruitment and Selection Policy

Removed reelection room

Risk Assessment Policy and procedure (Estates)

Statement on Bullying and Harrassment

Single Equality Scheme Policy(Equality and Diversity)

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 (2019)*
- *'Keeping Children Safe in Education' DfE (2019) - Part One and Annex A for 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*

\\staff1\staffhome\$\lshillito\Desktop\WORK2\Safeguarding\Safeguarding for All Policy 19 20 April 2020 update v8.docx

- *Early Years Common Inspection Framework (2018)*
- *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](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](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 2019)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835733/Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.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](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](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 Institutions  
<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

\\staff1\staffhome\$\lshillito\Desktop\WORK2\Safeguarding\Safeguarding for All Policy 19 20 April 2020 update v8.docx

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](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](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](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](http://www.nspcc.org.uk)

Jisc User Safety Briefing [http://www.jisc.ac.uk/publications/briefingpapers/2005/pub\\_usersafetybp.aspx](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](http://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](http://www.karmanirvana.org.uk)

Private Fostering

<http://www.privatefostering.org.uk/>

Disqualification by Association (September 2018)

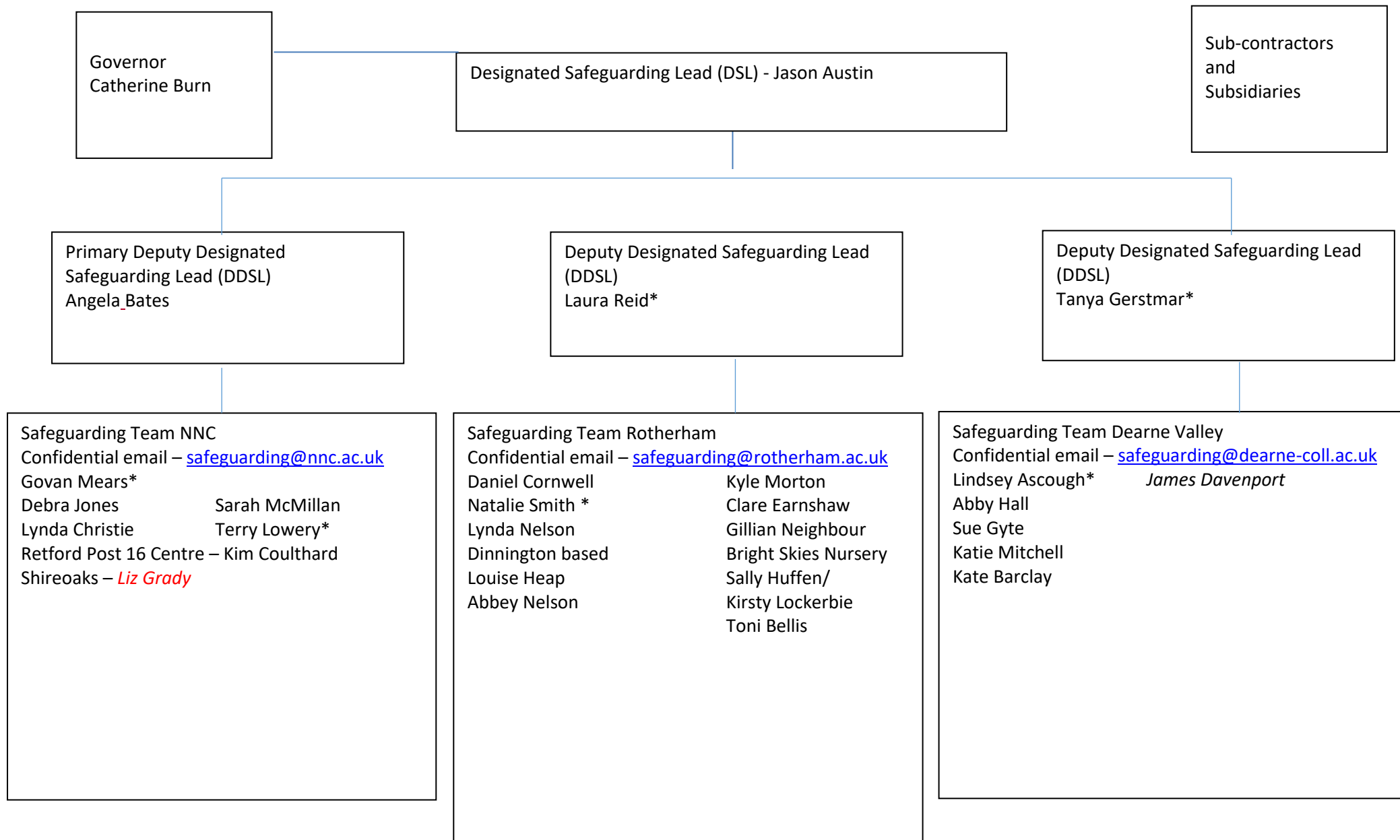
<https://www.safeguardingschools.co.uk/disqualification-by-association-september-2018/>

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](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)

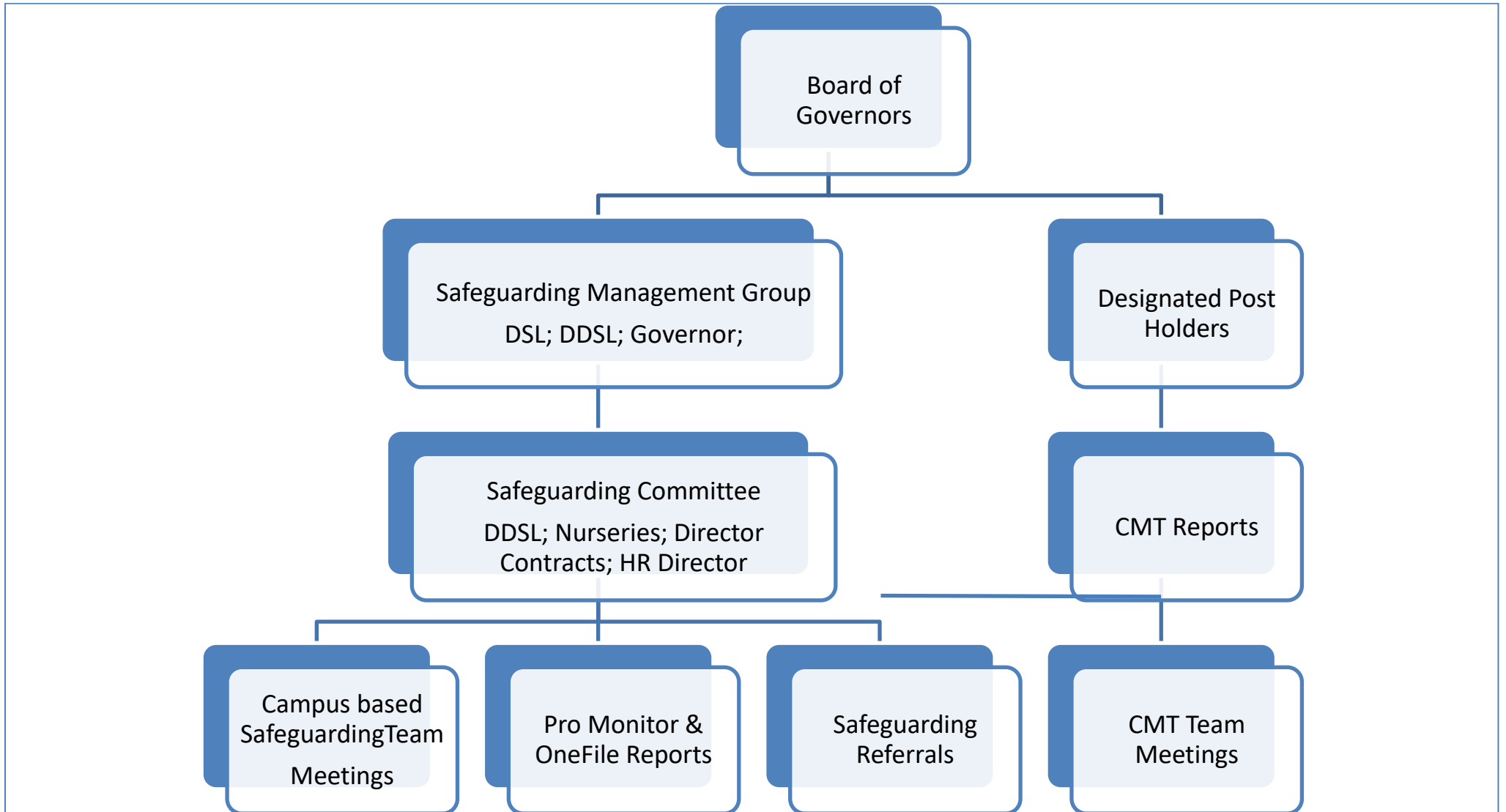


**Appendix 2: Safeguarding Team Structure**





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 number 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 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: Definition & Terms

### 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. 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*

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)

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/suspicious 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.*

### **Peer on Peer Abuse**

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. '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 children and young people 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 (2019) gives guidance to schools and colleges on how to manage reports of child on child sexual violence and sexual harassment;*
- *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 recognise 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’ violence (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ violence (HBV) 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 HBV 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 HBV, or already having suffered HBV.

### **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.

### **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.

### **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.

### **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.*

Further definitions can be found in Keeping Children Safe in Education (September 2019)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835733/Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf)