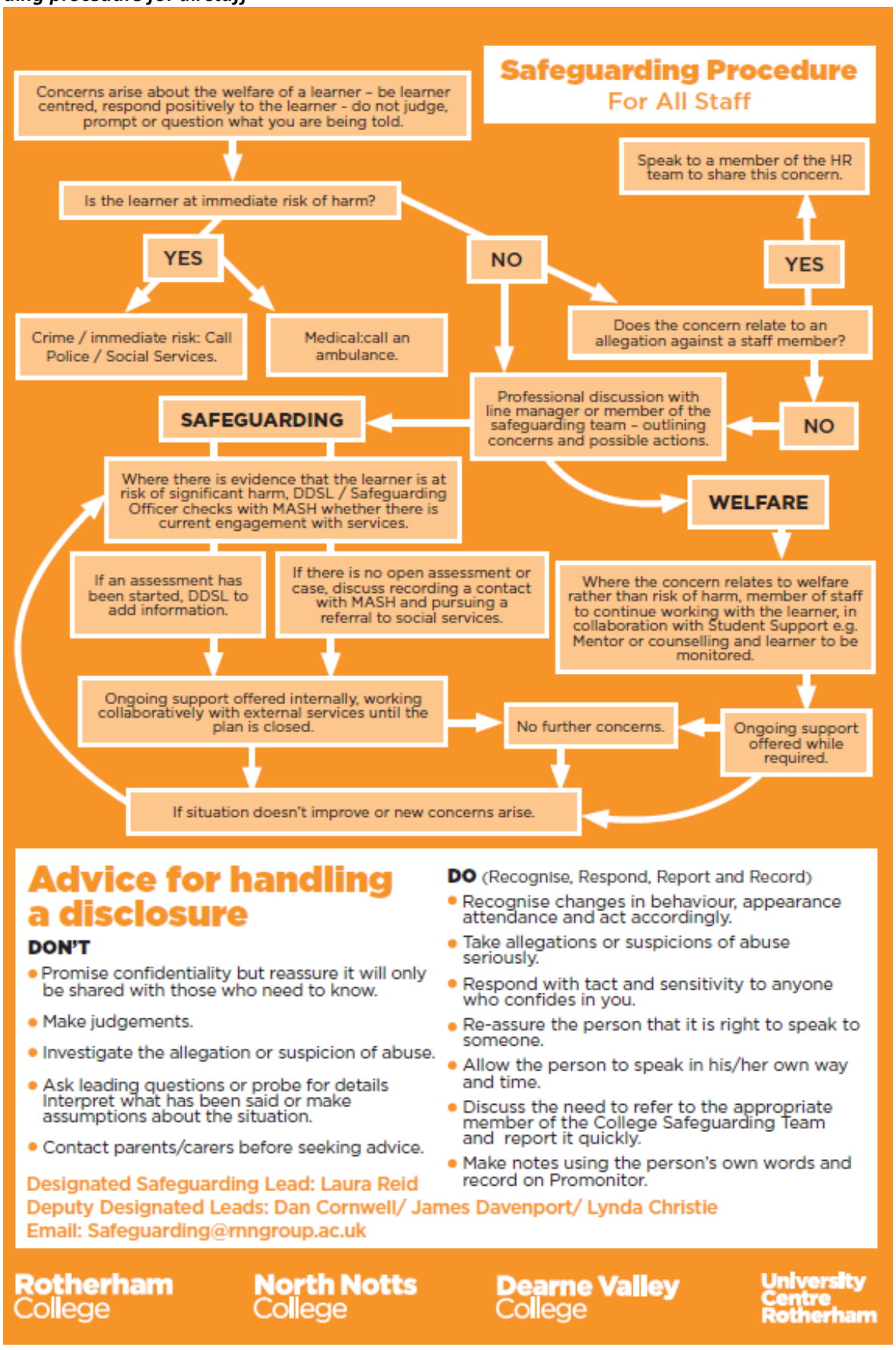
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| Brief summary of contents | A policy to provide guidance to staff and learners on the Groups promotion of and available schemes in Safeguarding, Child and Vulnerable Adult Protection and Prevent |
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This document is only valid on the day of printing
Controlled Document
This document has been created following the RNN Group policy production guidelines. It should not be altered in any way without the express permission of the author detailed above.

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***Safeguarding procedure for all staff***




*MASH – Multi Agency Safeguarding Hub

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Scope of policy: All learners, 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 'learners' within this policy refers to 14-16-year olds, 16-18-year-old learners, adults and apprentices.

This policy is the overarching Safeguarding Policy for all RNN employed staff, agency staff, organisations, stakeholders (including learners, parents, employers), 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, Student 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 Group Websites. learners are informed of this policy during induction, 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', is issued annually 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 learners 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 help and support to meet the needs of learners as soon as problems emerge.
- 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.
- Ensuring robust procedures and staff awareness are in place to support learners with medical conditions, food allergies, and severe health risks (including anaphylaxis), ensuring their physical safety and full inclusion across all campuses and activities.
- 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 learners 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 learner'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.

In our commitment to providing a safe and supportive environment for all, RNN Group recognises that the terminology used in safeguarding matters can be sensitive and should be handled with care. While this policy may use terms like 'victim,' 'alleged perpetrator,' and 'perpetrator' for clarity and consistency, we understand that individuals may not identify with these labels. Our primary goal is to offer non-judgmental support to all parties involved, and we encourage staff to be flexible and considerate, using the language that a child or young person is most comfortable with on a case-by-case basis. This includes recognising that in some situations, individuals who have caused harm may have also been harmed themselves. The most important thing is to prioritise the well-being of all involved and ensure everyone feels respected and heard.

2.1 Power Dynamics, Declarations of Interest, and Professional Boundaries

The RNN Group recognises that due to the diverse and lifelong nature of Further and Higher Education provision, staff members may have pre-existing personal, romantic, or familial relationships with individuals who subsequently enrol as learners.

However, because adults employed by, volunteering for, or contracted by the RNN Group hold an inherent Position of Trust, strict professional boundaries must be maintained to prevent conflicts of interest, favouritism, or an abuse of power.

- New Relationships: The RNN Group does not support or permit the formation of new romantic, intimate, or sexual relationships between staff members and any enrolled learner.
- Pre-existing Relationships & Mandatory Declaration: If a staff member's pre-existing partner, spouse, or close relative enrols in any provision within the RNN Group, the staff member must immediately declare this interest in writing to Human Resources and their Line Manager prior to the learner commencing learning.
- Conflict Management: Where a pre-existing relationship is declared, management will implement strict safeguards to ensure the staff member has no direct teaching, assessing, tutoring, internal verification, or pastoral responsibility for that learner. This maintains academic integrity and protects both parties.

Legal Framework (Under 18s): Staff must note that under the Sexual Offences Act 2003, it remains a criminal offense for an adult in a position of trust to engage in sexual activity with a child aged 16 or 17 within an educational setting, regardless of whether the relationship was pre-existing.

Failure to declare a pre-existing relationship, or attempting to initiate a new intimate relationship with an enrolled learner, represents a severe breach of professional boundaries. Such instances will be treated as a serious Low-Level Concern or a disciplinary matter, and investigated under the Staff Code of Conduct, up to and including dismissal.

## 3. Policy Amendments

This policy is reviewed annually and updated to ensure full statutory compliance with the following Department for Education (DfE) and Home Office guidance across all group operations:

- Keeping Children Safe in Education (KCSIE) (applicable statutory edition, including Part 1 and Annex 1/2 for Further Education).
- Working Together to Safeguard Children (current statutory guidance), incorporating local Multi-Agency Safeguarding Arrangements (MASA).
- Revised Prevent Duty Guidance for England and Wales (issued under Section 29 of the Counter-Terrorism and Security Act 2015).
- DfE Meeting Digital and Technology Standards in Schools and Colleges (Filtering and Monitoring standards).
- Allergy Safety in Schools and Colleges statutory guidance.
- UK General Data Protection Regulation (UK GDPR) & Data Protection Act 2018 (specifically supporting information sharing under Part 2, Schedule 8 for safeguarding individuals at risk).

**Departmental advice**
What to do if you're worried that 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. Further information can be found in the staff Code of conduct Policy.

## 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 are 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. 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 Children's Partnership and attends the local Safeguarding Forums.

## 5. Roles & Responsibilities

All those working with or on behalf of children or vulnerable adults have a responsibility to protect them. Training is provided to ensure all staff are aware that safeguarding issues or behaviours can be associated with factors outside of the Group and can occur with children/ people outside of the Group. All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children/learners can be at risk of harm inside and outside of the

Group, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may need help or protection.

The RNN Group has appointed key people who have specific safeguarding responsibilities and constitute the organisation's designated safeguarding team.

**The Board of Governors** has strategic leadership responsibility for the RNN Group's safeguarding arrangements. Governors will undertake appropriate training to ensure they are able to carry out their duty to safeguard all learners. The Board and the Quality and Standards Committee receives a report at each meeting updating them on the current position regarding safeguarding in the Group and any external policy and procedural changes.
The Board are accountable for appointing a safeguarding link governor who is responsible for liaising with the CEO and Principal and senior staff members over matters regarding protection.
The Board has a responsibility to:

- Provide Strategic leadership of the Group's safeguarding arrangements.
- Ensuring a whole Group approach is facilitated ensuring the best interest of the learner at all times.
- Evaluate and review this policy at each review, ensuring it complies with the law, and hold the CEO and Principal to account for its implementation.
- Appoint a senior board level leader to monitor the effectiveness of this policy in conjunction with the full Board, this is always a different person to the DSL.
- Ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support.
- Ensure all staff undergo safeguarding and child protection training appropriate to their role, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- RNN Group is carrying out its duties to safeguard the welfare of learners.
- Members of staff and volunteers are aware of current safeguarding policies and procedures and that staff receive training where appropriate.
- Safeguarding is integrated into the Group's induction procedures for all new members of staff and volunteers and supply staff.
- Ensuring that sufficient resources are made available to enable the necessary tasks to be carried out properly under inter-agency procedures.
- Ensure that the Group has appropriate filtering and monitoring systems in place, and review their effectiveness.
- Make sure that safeguarding requirements are a condition of using the RNN Group premises, and that any agreement to use the premises would be terminated if the body fails to comply.
- 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 Officer** has executive responsibility for safeguarding and 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, including to:

- Carry out their role in accordance with the responsibilities outlined in Annex C of Keeping Children Safe in Education. The DSL will provide advice and support to other staff on child welfare and child protection matters. At least one other person in RN Group is designated as the Deputy Safeguarding Lead, they will be responsible for the role if the DSL is absent.
- Act as the main point of contact with local safeguarding partners and keep up to date with local safeguarding arrangements.
- Facilitate a whole Group -approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of our school's process and policy development.
- Take lead responsibility for promoting the educational outcomes of vulnerable children. They need to ensure that:

- Information is shared about welfare, safeguarding and child protection issues with tutors, wellbeing staff and leaders.

    - There is a particular focus on children with social workers to ensure that;
        - Staff know who these vulnerable children are.
        - They understand these children's academic progress & attainment.
        - They maintain a culture of high aspirations for vulnerable child.
        - They support teaching staff to identify challenges these children may face and the academic support and adjustments that could be made.

- Undertake safeguarding training as recommended by Local Safeguarding Children Partnership and update this training every two years. Additionally, the DSL will receive regular updates to safeguarding training via the termly Education Safeguarding Forum, e-bulletins, e-learning, etc.
- Liaise with Children's Social Care and other agencies where necessary and make referrals of suspected abuse to Children's Social Care, take part in strategy discussions and other interagency meetings and contribute to the assessment of children, including Early Help assessments.
- Maintain accurate electronic or written records and child protection files ensuring that they are
- kept confidential and stored securely.
- Ensure that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained to the appropriate level recommended by Keeping Children Safe in Education and the Rotherham Safeguarding Children Partnership.
- Lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). This should be explicit in the role of the job holder's job description, Keeping Children Safe in Education.
- Liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.
- Maintain strategic oversight of all filtering and monitoring systems, policies, and alert mechanisms.
- Review daily/weekly automated monitoring reports and ensure high-risk flags (e.g., suicide, self-harm, radicalisation, child sexual exploitation) are triaged and investigated immediately.
- Conduct an annual review of filtering and monitoring effectiveness in partnership with the Executive Director of Strategic Planning and Corporate Services.

**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 Strategic Planning and Corporate Services** has responsibility at a strategic level for:

- IT and Digital.
- Health & Safety.
- Risk assessments.
- First Aid Procedures.
- Estates.
- Overseeing First Aid provision across all sites, including the maintenance, storage, and accessibility of emergency medical supplies, auto-injectable adrenaline (AAIs/EpiPens), and allergen awareness protocols in campus facilities and dining outlets.

**Director of IT and Digital**

- Ensure technical implementation of age-appropriate filtering controls that block unlawful, harmful, or inappropriate content (including terrorist and extremist material) without unreasonably restricting legitimate learning.
- Maintain robust system architecture that logs user attempts to bypass filtering mechanisms (e.g., VPN use, proxy sites) and automatically escalates breaches to the DSL team.
- Ensure all staff are trained during induction on how filtering and monitoring operates, how to report system vulnerabilities, and their duty to report identified online safety concerns.

**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.
- Identifying and assessing levels of risk associated with Criminal Convictions and referrals to Safeguarding panel.
- Supporting and assisting staff or learners to make referrals.
- 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 learners who are reporting concerns.
- Liaising with Children & Young People's and Adult Services as appropriate.
- Monitoring referrals and learner wellbeing through appropriate panel meetings.
- Providing a holistic approach to safeguarding through the disciplinary policy and procedures relating to the conduct of learners and the coordination and organisation of the RNN Group's internal learner support and assessment services and developing the Groups' Charter.
- Developing safeguarding training materials, files, procedures and contacts.
- Delivering training where appropriate.
- 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.
- Liaising with secondary schools and academies which send pupils to the RNN Group to ensure that appropriate arrangements are made for the learners.

**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.
- Supporting liaison and with Assessors, tutors and Work Placement Officers 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.
- Supporting and advising colleagues where learner(s) behaviour(s) or action(s) do not uphold the RNN Group code of conduct expectations, or where learner(s) are suspected to be in possession of offensive weapons or substances, in line with security and learner disciplinary policies and procedures.

**Virtual School Headteachers:**
Virtual school headteachers have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker. This cohort of learners can include Looked after Children (LAC), Previously Looked after children (PLAC), Care Leavers and those who have been on statutory Child Protection Plans. They should also identify and engage with key professionals e.g., DSLs, SENCOs, social workers, mental health leads and others.

**Teaching & Personal Development 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 Personal Safety, Progression opportunities, British values how they influence our society;

Promotion of children's welfare

- 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.
- Escalating concerns in relation to a setting or placement to the DSL or DDSL for referral to the LADO.
- Maintaining awareness of individual care plans (ICAs), medical conditions, and severe allergies within their cohorts.
- Completing mandatory safeguarding and medical response training, enabling prompt recognition of medical emergencies (including severe allergic reactions/anaphylaxis) and immediate escalation to designated first aiders/emergency services.

**Student Support Teams** are responsible for:

- 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 or others, who are at risk of harm.
- Escalating concerns in relation to a school, academy or organisation to the DSL for referral to the LADO.

**Inclusive Curriculum Team** (FLEX, Project Based Learning and RNN Engage) are responsible for:

- Preparing young people for life in modern Britain and promoting British values through teaching, learning and assessment activities;
- Providing a dedicated study programme and/or framework or standard which defines and explores Personal Safety, Progression opportunities, British values how they influence our society;

Promotion of children's welfare

- 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.

**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 learners 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 learners 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.
- Ensuring that external learning environments and workplaces are explicitly assessed through a contextual safeguarding lens, recognising that 16+ learners and apprentices face distinct risks outside the physical Group campus.
- Coordinating robust safeguarding checks with employers prior to placement. Employers must be vetted not only for standard Health & Safety compliance, but explicitly for their institutional understanding of the Prevent Duty, child criminal exploitation (including County Lines), and the mitigation of sexual misconduct.
- Ensuring employers demonstrate active measures to prevent the sexual harassment of apprentices in the workplace, aligning with current UK worker protection legislation.

**Employers** are responsible for:

- Understanding their responsibilities with regard to relevant government legislation and RNN policies and procedures.
- Ensuring staff working with learners 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 learners 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.
- Demonstrating an active commitment to creating a safe working environment that protects 16+ learners and apprentices from harm, discrimination, and radicalisation.
- Implementing robust internal policies to prevent and swiftly address any instances of sexual harassment, inappropriate behaviour, or breach of professional boundaries by employees, contractors, or third parties toward the apprentice.
- Exercising professional curiosity and maintaining open lines of communication with appropriate RNN Group teams regarding any external vulnerabilities, sudden behavioural changes, or contextual safeguarding risks identified in the learner's life outside of work.

**Bids & Contracts Team** are responsible for:

- Ensuring partners are aware of their safeguarding obligations, through guidance and training.
- Ensuring that any staff working with learners 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 learners have received training and an understanding of their role in safeguarding children and young people.
- Ensuring learners have an awareness of safeguarding and understand how to access the RNN Group support services.
- Ensuring learners 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.

**Sub-contractors** are responsible for:

- The responsibility of ensuring compliance sits with the Bids and Contracts Manager.
- Adhering to RNN Group's Safeguarding Policies and Procedures: Subcontractors must fully understand and comply with the RNN Group's "Safeguarding for All Policy" and related procedures. This includes knowing how to identify and report concerns regarding child protection and vulnerable adults.
- Safer Recruitment Practices: Ensuring all staff employed or engaged in delivering provision have undergone robust safer recruitment checks, including appropriate Disclosure and Barring Service (DBS) checks, identity checks, reference checks, and verification of qualifications, particularly for roles involving direct contact with learners.
- Safeguarding Training: Ensuring all staff receive regular and up-to-date safeguarding training, including awareness of different types of abuse, signs of harm, the Prevent duty, and local risks (e.g., County Lines, online safety, child sexual exploitation).
- Designated Safeguarding Lead (DSL) and Reporting Pathways: Having a clear Designated Safeguarding Lead (or equivalent) within their organisation who is appropriately trained and responsible for managing safeguarding concerns. Subcontractors must also understand and utilise the RNN Group's reporting pathways for any safeguarding issues that arise.
- Promoting a Safe Learning Environment: Actively fostering an environment where learners feel safe, can express concerns, and are protected from harm. This includes establishing professional boundaries and ensuring staff conduct is always appropriate.
- Effective delivery which defines and explores Personal Safety, Progression opportunities, British values how they influence our society

- Information Sharing: Understanding their responsibilities for appropriate and timely information sharing with the RNN Group and external agencies (e.g., social services, police) when there are safeguarding concerns, in line with data protection regulations.
- Policy and Procedure Alignment: Maintaining their own comprehensive safeguarding policy and procedures that are commensurate with, or adopt, the RNN Group's standards.
- Monitoring and Oversight: Providing assurance to the RNN Group that their safeguarding arrangements are effective and being consistently implemented, often through regular performance reviews and audits.

**Director of IT and Digital** is responsible for:

- Maintaining policies and procedures relating to the safe use of technology, filtering and monitoring.
- To ensure the technical infrastructure is secure and safe for all users. This includes implementing and maintaining robust internet filtering and monitoring systems to prevent access to inappropriate or harmful content, securing data in line with GDPR and other data protection regulations, and ensuring that all digital platforms and communication tools used by the RNN Group are fit for purpose and do not expose individuals to undue risk.
- To ensure all RNN Group premises are physically safe and secure. This includes the implementation and maintenance of robust security measures such as CCTV, access control systems
- To provide strategic leadership on digital safeguarding. This involves staying up-to-date with emerging online risks and technologies, developing and implementing policies and procedures for the safe and responsible use of IT systems and digital media, and collaborating with the Designated Safeguarding Lead (DSL) and other senior leaders to promote a positive and secure online culture across the entire RNN Group.

**Director of Estates, Facilities, and Health & Safety** is responsible for:

- Maintaining policies and procedures relating to Health and Safety, Facilities and Estates.
- To ensure all RNN Group premises are physically safe and secure. This includes the implementation and maintenance of robust security measures such as CCTV, access control systems, and effective lighting. They are responsible for ensuring that all buildings, grounds, and facilities meet statutory health and safety standards to protect children, young people, and adults at risk from harm.
- To manage all aspects of safeguarding related to the physical environment. This involves ensuring that all contractors and visitors working on-site have appropriate checks and are supervised, that fire and emergency procedures are clearly defined and practiced, and that all physical risks, such as those related to equipment or building maintenance, are identified and mitigated promptly to prevent accidents or harm.

**Designated LAC Lead (Designated Teacher)** is responsible for:

- Working with local authorities to promote the educational achievement of registered Looked after learners (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 & FREDIE Management Group**

These committees should be chaired by the Director of Safeguarding and Student Support (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 Director of Safeguarding and Student Support reports to the Safeguarding & FREDIE Management and the Senior Leadership Team, which in turn reports in to Quality and Standards Groups and the Board of Governors.

Reporting disclosures;

The Designated Safeguarding Lead is: Laura Reid, 01709 722747, lreid@rnngroup.ac.uk
The Deputy DSLs are:
Dan Cornwell, 01709 722844, dcornwell@rnngroup.ac.uk
Lynda Christie, 01909 504778, lchristie@rnngroup.ac.uk
James Davenport, 01709 513333 ext. 1035, jdavenport@rnngroup.ac.uk
Tanya Gerstmar, 01709 513333 ext. 1021 tgerstmar@rnngroup.ac.uk
All staff are aware of the wider safeguarding team members and how to contact them Safeguarding@rnngroup.ac.uk. 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://rotherhamscp.trixonline.co.uk/

Nottinghamshire: https://nottinghamshirescp.trixonline.co.uk/

Doncaster: https://doncasterscp.trixonline.co.uk/

Sheffield: https://sheffieldscp.trixonline.co.uk/

Barnsley: https://barnsleyscp.trixonline.co.uk/

**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).
- Is experiencing, or at risk of abuse or neglect.
- 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. Protecting Staff Against Malicious, Unsubstantiated, or Unfounded Allegations**

The Group takes its safeguarding obligations with the utmost seriousness. Simultaneously, the Group recognises that false, malicious, or unfounded allegations can cause severe distress and lasting damage to a staff member's career, wellbeing, and reputation. The Group is committed to conducting all safeguarding investigations with fairness, objectivity, and confidentiality, ensuring appropriate support is provided to staff throughout the process.

9.1 In line with statutory guidance, allegations investigated under this policy will be categorised as follows upon conclusion of an investigation:

- Substantiated: Supported by clear evidence.
- Unsubstantiated: Insufficient evidence to prove or disprove the allegation (does not imply guilt or innocence).
- Unfounded: No evidence or factual basis to support the allegation, or a clear misinterpretation of events.
- Malicious: Clear evidence that the allegation was made deliberately falsely, with intent to cause harm, deceive, or mislead.

9.2 Action in the Event of Malicious Allegations

- Learner Allegations: If an investigation concludes that a learner made a deliberately false or malicious allegation against a staff member, the matter will be referred immediately for formal disciplinary action under the Group's Positive Behaviour Support and Engagement Policy. Sanctions may include formal warnings, suspension, or exclusion from the Group.

- Staff or Third-Party Allegations: If a member of staff or an external party is found to have made a malicious report, the Group will handle the matter under the Staff Disciplinary Procedure or appropriate contractual/legal channels.

9.3 Support for Affected Staff Where an allegation against a staff member is determined to be unfounded, unsubstantiated, or malicious:

- Immediate Support: The staff member will receive immediate written confirmation of the outcome, and their personnel file will reflect that the allegation was found to be unfounded or malicious.
- Wellbeing Services: The Group will provide access to independent Occupational Health and Employee Assistance Program (EAP) counselling support.
- Reintegration: If the staff member was suspended or placed on alternative duties during the investigation, a structured reintegration plan will be created to support their smooth return to normal duties.
- Reputational Protection: Every reasonable effort will be made to maintain strict confidentiality. In cases where the allegation has become public knowledge, the Group will consult with the staff member to agree on appropriate measures to restore their professional reputation.

9.3 Confidentiality and Anonymous Reporting:

- All allegations will be treated with strict confidentiality. Details will only be shared on a need-to-know basis with those directly involved in the investigation or safeguarding decision-making.
- While anonymous reports will be logged and assessed for genuine safeguarding risks, the Group acknowledges the difficulty in investigating anonymous claims and will guard against anonymous reporting being weaponised as a tool for harassment.

**10. 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' learner's life. However, it is important to note that the behaviour of learners at risk may present as challenging, defiant or withdrawn. The RNN Group aims to identify learners 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.

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 learners through:

- Forging excellent working partnerships with other Colleges, schools and agencies which can help to inform a learner's specific issues and needs. For example; LAC learners, previously LAC learners, 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 learners 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 learners 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 learners 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 Group 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.

**11. Safeguarding issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of. See Appendix 5: Definitions and terms for more information.

***12. Children with Special Educational Needs and Disabilities (SEND) and Medical Conditions / Severe Allergies***

Learners 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.
- Learners 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 learner 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 SEND Code of Practice 0-25 years and the NSPCC document 'We have the right to be safe – Protecting disabled children from abuse' (October 14). Additional support is available from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk).
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

12.1 Learners with Medical Conditions, Allergies, and Anaphylaxis

The Group recognises that unmanaged medical conditions and severe allergies (anaphylaxis) represent potential risks to learner safety and physical wellbeing.

- **Individual Care Plans (ICAs):** High-risk learners (including those with severe food, environmental, or medication allergies) will have an IHCP in place, detailing triggers, emergency contacts, and required interventions.
- **Allergen Management:** Tutors and staff conducting off-site visits, practical workshops, or catering activities must conduct risk assessments considering individual allergen triggers and emergency medication storage.
- **Emergency Response:** Staff must be aware of learners who carry prescribed adrenaline auto-injectors (AAIs) or require emergency medication and know how to call for immediate on-site First Aid and emergency services (999).

***13. Statutory Information Sharing Duty (Section 16LA Children Act 2004)***

In accordance with Section 16LA of the Children Act 2004 (as amended by the Children's Wellbeing and Schools Act 2026) and statutory guidance, the RNN Group and its staff are subject to a statutory duty to share information for the purposes of safeguarding and promoting the welfare of children and young people.

13.1 Principles of the Statutory Duty

- No Statutory Threshold: Staff must not wait for a child to reach a specific statutory threshold (such as Section 47 child protection enquiries or formal social care referrals) before sharing information. Information must be shared whenever it is relevant to early help, prevention, emerging welfare concerns, or unmet needs.

- Proactive Disclosure: Where staff hold information that may facilitate another relevant organisation (including Local Authorities, Police, Integrated Care Boards, NHS Trusts, Youth Justice Services, or schools/colleges) in exercising their safeguarding or welfare functions—including assessing risk, making decisions, or providing support—that information must be disclosed.

- Connected Individuals & Contextual Safeguarding: The duty to share applies equally to information held about other individuals connected to a child (including parents, carers, household members, or peers) where that information is relevant to the child's safety or welfare (e.g. domestic abuse, substance misuse, county lines exploitation, or adult mental health concerns).

13.2 Overcoming Barriers: Consent, Confidentiality, and Data Protection

- Displacement of Common Law Duty of Confidentiality (CLDoC): Compliance with the statutory information sharing duty under s16LA overrides the Common Law Duty of Confidentiality. Confidential information can be shared without consent and without needing to establish an overriding public interest.

- Consent Not Required: Staff do not require consent from parents, carers, or learners to share relevant safeguarding or welfare information under this duty. Information must never be withheld simply because:

    - A parent, carer, or learner objects or refuses consent;
    - There is a fear of parental complaint, criticism, or damaged working relationships;
    - A practitioner feels uncertain or uncomfortable (in such cases, advice must be sought immediately from the Designated Safeguarding Lead).

- Transparency: While consent is not a legal prerequisite for sharing under s16LA, practitioners should remain transparent with families about what information is being shared and why, provided doing so does not place the child at increased risk of harm.

13.3 Limitation: The "Detriment to the Child" Test The statutory duty to share information applies in all circumstances except in extremely limited scenarios where a practitioner, in consultation with the Designated Safeguarding Lead (DSL), determines through professional judgement that sharing the information would be more detrimental to the child than not sharing.

- Valid Grounds for Detriment: A decision to withhold or limit information on detriment grounds is rare and strictly limited to situations where sharing would:
    1. Place the child (or another child) at immediate and serious risk of harm (e.g. disclosing a hidden emergency shelter location to an abusive family member or unverified portal);
    2. Directly prejudice an ongoing police investigation in a manner that increases risk to a child;
    3. Contravene a specific Court Order or Family Procedure Rules.
- Mandatory Risk Mitigation: Where potential detriment is identified, staff must seek to mitigate the risk (e.g. sanitising location-specific details, restricting distribution to a strict need-to-know basis, or redacting sensitive third-party identifiers) so that vital safeguarding intelligence can still be shared safely.
- Recording Requirements: Every decision to withhold or restrict information on detriment grounds must be formally recorded on the safeguarding system with clear rationale and reviewed regularly.

13.4 Cross-Boundary Information Sharing When a learner relocates, transfers between institutions, or moves across local authority boundaries in England, all relevant safeguarding and welfare history must be proactively shared with the recipient organisation under s16LA. The absence of a formal multi-agency Data Sharing Agreement (DSA) between institutions or local authorities must never delay or prevent the sharing of safeguarding information.

## 14. Intimate Care

Intimate care may be defined as any activity required to meet the personal care needs of each individual young person/ adult. Parents have a responsibility to advise staff of the intimate care needs of their young person, an assessment will be required to ensure the RNN Group can meet the needs of the individual. Identified staff have a responsibility to work in partnership with learners and parents.

## 15. 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.

## 16. Care experienced student (Looked after Children and Previously Looked After Children)

A care experienced student, (may be called a Looked after Child (LAC) or someone who was previously in care (PLAC)) 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 learners 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.

## 17. 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 attendance and progress of these learners in college and any areas of concern within or outside of the Group. Fortnightly 'at risk' meetings are held with key members of staff, where these learners will be discussed to allow any issues and/ or support needs to be identified 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.

**18. Attendance, Children Absent from Education (CAE) and Children Missing Education (CME)**

Good attendance is a core safeguarding mechanism. The RNN Group recognises that persistent absence, sudden changes in attendance patterns, or persistent lateness are rarely isolated administrative issues; they are frequently vital warning signs of underlying safeguarding concerns, including neglect, domestic abuse, child sexual exploitation (CSE), child criminal exploitation (CCE / County Lines), serious violence, or unaddressed mental ill-health.

**Emergency Contact Information:**

In accordance with statutory guidance, the RNN Group mandates that **a minimum of TWO up-to-date emergency contact numbers** must be collected and retained for every enrolled learner. Parents, carers, and guardians must notify the Group immediately of any changes to contact details. Holding multiple contacts ensures that the Group can swiftly reach a responsible adult in an emergency or when investigating unexplained absences.

**Absence Tracking & Day-1 Outreach Protocol:**

The Group maintains daily attendance monitoring across all courses and provisions:

- **General Learners:** Automated outreach initiates on **Day 1** of any unexpected or unauthorised absence, this includes full and part days and individual lessons.
- **High-Risk & Vulnerable Cohorts:** Direct, immediate outreach is initiated on **Day 1** for care-experienced learners (LAC/PLAC), those on a Child Protection (CP) or Child in Need (CiN) plan, learners with High Needs, Year 11 Equivalent (15/16 year olds) and young carers, , this includes full and part days and individual lessons.. If contact cannot be established by the end of the day, the learner's assigned Social Worker, local authority key worker, or emergency contacts will be formally notified.

Children Missing Education (CME) Protocol: Where a learner under 18 fails to attend for 10 consecutive school days without explanation, or where a learner moves away without a known destination, the Group will execute joint enquiries with the Local Authority. If the learner remains untraced after 20 consecutive days of unauthorised absence, a formal Children Missing Education (CME) notification will be submitted to the Local Authority in accordance with statutory regulations.
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.

**19. 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. The Personal Development curriculum provides practical advice on how to keep themselves safe, as our learners become more independent.

**20. 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
https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims

**21. 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) such as online fraud, hate speech, stalking, or child sexual abuse material or 'cyber dependent' (crimes that can be committed only by using a computer) such as malware attacks, hacking, or denial-of-service (DoS) attacks.

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.
- 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

**22. 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 or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a parent or carer in custody, or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves.
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

**23. 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.

**24. Online Safety**

The RNN Group ensures learners are aware of appropriate behaviours and critical thinking skills to enable them to remain safe and legal when using technology across all group settings, in line with the Acceptable Usage Policy (AUP) and ICT Guidelines. Staff must remain aware that risks occur online and offline simultaneously.

The predominant online risks are categorised as:

- Content: Exposure to illegal, harmful, or inappropriate material, including pornography, fake news, extreme misogyny/misandry, and hate speech. This includes exposure to harmful, unverified, or non-consensual content generated by Artificial Intelligence (AI) tools.
- Contact: Harmful interactions with others, including online grooming, commercial exploitation, and peer targeting.
- Conduct: Personal online behaviour causing harm, such as online bullying, harassment, and the creation or sharing of explicit imagery.

Generative AI, Deepfakes, and Synthetic Media:

The RNN Group strictly prohibits the creation, possession, requesting, or distribution of explicit, nude, or semi-nude images and videos—whether real or synthetically generated using Artificial Intelligence (AI deepfakes).

- Both consensual and non-consensual sharing of self-generated or AI-altered explicit media involving minors (under 18) is illegal and treated as a serious child protection issue.
- Incidents involving AI deepfakes or youth-produced sexual imagery will be escalated immediately to the DSL and managed under statutory safeguarding protocols and police guidelines.

Governance and Technical Oversight:

In accordance with DfE technical standards, the RNN Group maintains active filtering and monitoring systems managed jointly by the Director of IT & Digital and the DSL.

- Filtering and monitoring systems are configured to block and alert on harmful material, including self-harm, radicalisation, and AI-assisted creation of illegal content.
- The Governing Body and Senior Leadership Team review filtering and monitoring reports at least termly to evaluate system effectiveness, oversee response protocols, and verify that cyber-security controls remain robust.

24.1 IT Filtering, Monitoring, and Extremism Incident Escalation - Digital Standards & Technical Controls

In compliance with DfE *Meeting Digital and Technology Standards in Schools and Colleges*, the RNN Group implements automated filtering and monitoring systems (managed by IT and Digital Services) across all campus networks, Group-owned devices, and guest/public Wi-Fi services.

Technical controls block access to:

- Known extremist or terrorist websites and domain lists (including proscribed organisations).
- Material promoting hate speech, violence, or illegal radicalisation.
- Anonymising tools and proxy sites used to bypass network filters (e.g., VPNs).

24.1.2 Automated Alert Triage Protocol

- **Immediate Triage:** Automated monitoring software flags high-risk search terms, attempt logs, or document content related to radicalisation, weapons, or terrorism.
- **Escalation to Prevent Lead:** All automated flags categorised as extreme/radicalisation are routed immediately to the Prevent Lead and DSL team for review.
- **Investigation Procedure:** The Prevent Lead will determine whether the search or download was part of legitimate academic research (e.g., Higher Education dissertation or specific course unit) or represents an immediate safeguarding concern. Academic research involving sensitive material must receive prior clearance via the formal Research Ethics framework.

## 25. Information security and access management

The RNN Group is responsible for ensuring the appropriate levels of security protection procedures are in place in order to safeguarding their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber – crime technologies.

### 25. Mental Health

All staff must be aware that mental health problems can be an indicator that a child or young person is suffering, or is at risk of suffering, abuse, neglect, or exploitation. Conversely, severe mental health challenges increase a learner's vulnerability to external risks, peer exploitation, and online harm.

Staff are not expected to diagnose conditions, but they must maintain professional curiosity. Sudden changes in behaviour, withdrawal, self-harm, persistent absence, or severe anxiety must be reported to the Safeguarding Team as potential indicators of underlying safeguarding concerns. The Group ensures clear internal referral pathways to student support/wellbeing staff and external signposting to Child and Adolescent Mental Health Services (CAMHS) or Adult Mental Health Services.

### 26. 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.

### 27. 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.

### 28. Learners who are lesbian, gay, bisexual, or gender questioning

LGBTQ+ and gender-questioning learners may face heightened safeguarding risks, including peer isolation, discriminatory bullying, and mental health challenges.

Gender-Questioning Framework & Social Transition:

In line with statutory guidance, the RNN Group applies a cautious, compassionate, and evidence-informed approach when supporting gender-questioning learners:

- Exploration vs. Requests for Social Transition: Staff must distinguish between a learner exploring feelings about their gender and a formal request to socially transition (e.g., changes to preferred names, pronouns, or uniform).
- DSL/DDSL Lead & Decision-Making: Any request regarding social transition must be referred to the Designated/Deputy Safeguarding Lead (DSL/DDSL). Staff must not independently implement social transition measures without a formal decision.

- Parental Engagement: Parents and carers will be involved in discussions regarding social transition, except in rare circumstances where the DSL assesses that involving parents would expose the learner to a significant risk of harm.
- Single-Sex Provisions: Support for gender-questioning learners will be balanced against legal obligations to maintain single-sex facilities as outlined in Section 29.

**29. Toilet and Changing Facilities: Safety, Privacy, and Dignity**

The RNN Group is committed to ensuring that all learners and staff have access to safe, clean, and appropriate toilet and changing facilities that uphold their dignity and privacy. This commitment is underpinned by statutory requirements, best practice guidance, and the implications of recent legal rulings, particularly the UK Supreme Court's clarification on the definition of "sex" in the Equality Act 2010.

Core Principles:

- Legal Compliance: The Group adheres to all relevant legal obligations regarding toilet and changing facilities, including the School Premises (England) Regulations 2012 (where applicable) and the Equality Act 2010.
- Safeguarding Priority: The design, management, and use of all facilities prioritise the safeguarding and well-being of all individuals, preventing opportunities for bullying, harassment, or abuse.
- Dignity and Privacy: All facilities are maintained to ensure maximum privacy and dignity for users, with appropriate locks, cubicle designs, and ventilation.
- Implications of the UK Supreme Court Ruling on "Sex" (For Women Scotland v The Scottish Ministers, 2025):
- The Supreme Court has clarified that, for the purposes of the Equality Act 2010, the term "sex" refers to biological sex (a person's sex assigned at birth). This ruling has direct implications for the provision and use of single-sex facilities within educational settings:
- Single-Sex Facilities (Pupils aged 8+ / Staff): The RNN Group will ensure the provision of separate single-sex toilet facilities for boys and girls aged 8 and over, and for male and female staff, in accordance with legal requirements. Where facilities are lawfully designated as single-sex, access will be restricted based on biological sex. This approach is taken to uphold the privacy, dignity, and safeguarding of individuals and to maintain the legal status of single-sex spaces.
- Transgender and Gender-Questioning Individuals: The Group recognises its duty to treat all individuals with dignity and respect, including transgender and gender-questioning learners and staff. Where single-sex facilities are provided based on biological sex, the Group will make suitable alternative provision available for transgender and gender-questioning individuals who may not feel comfortable using facilities aligning with their biological sex. This alternative provision aims to ensure that all individuals have access to appropriate and safe facilities without being "outed" or discriminated against. Such alternative provisions may include clearly designated individual, lockable, gender-neutral toilets.
- Maintaining Single-Sex Status: Any exceptional circumstances that might permit temporary access by a person of the opposite biological sex to a single-sex facility (e.g., a genuine emergency) will be clearly justified, carefully documented, strictly time-limited, and must not undermine the overall legal status of the single-sex provision.
- No Blanket Exclusion: The Supreme Court ruling does not mandate a blanket exclusion of transgender individuals from all areas of Group life. The Group will continue to apply a nuanced approach, considering the specific context, age, maturity, and safeguarding concerns in all decisions, while ensuring compliance with legal requirements and fostering an inclusive ethos.

**30. Child on child/ peer on peer abuse**

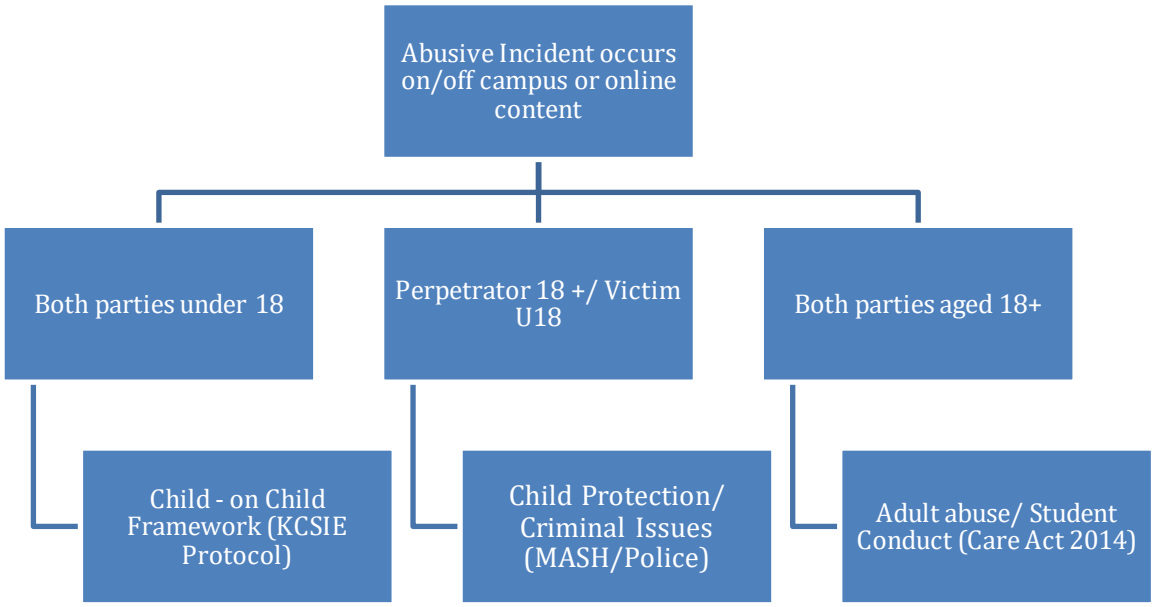
29.1 Terminology Alignment and Compliance

While historical internal guidance within the RNN Group utilised the term "Peer-on-Peer" abuse, this policy formally aligns with statutory Department for Education (DfE) guidance by implementing the mandatory term "Child-on-Child Abuse" for all incidents involving minors.

In a Further Education (FE) setting where adult learners (aged 18–25+) study alongside children (including 16–18 learners and 14–16 Electively Home Educated learners), a strict legal and operational distinction must be maintained based on the ages of the parties involved. Abuse is abuse and will never be tolerated, downplayed, or dismissed as "banter" or a normal part of growing up.

Culture & Misogyny:
Abuse will never be tolerated, downplayed, or dismissed as "banter," "just having a laugh," "part of growing up," or "boys being boys." Dismissing inappropriate behaviours or sexual harassment in this manner normalises harmful behaviour and leads to a culture of misogyny, misandry, and disrespect. All staff have a mandatory duty to challenge and report such behaviours immediately.

29.2 The Legal and Operational Divide
To satisfy statutory safeguarding compliance and ensure accurate external reporting, the RNN Group manages, tracks, and escalates incidents through three distinct age-based legal pathways:




1. Both Parties Under 18: Statutory Child-on-Child Abuse
If an incident occurs where both the victim and the alleged perpetrator are under the age of 18, it is legally classified as Child-on-Child Abuse.

Framework: Managed strictly under the statutory protocols of Keeping Children Safe in Education (KCSIE).

Action: Immediate logging via the Safeguarding Team on CPOMS, multi-agency risk assessment, and potential referral to the Local Authority Multi-Agency Safeguarding Hub (MASH).

2. Perpetrator 18 or Older and Victim Under 18: Child Protection & Adult-on-Child Abuse
If an incident involves an alleged perpetrator who is an adult (aged 18 or older, including adult learnerss, staff, apprentices, or visitors) and a victim who is a child (under 18), this is not a "peer" or "child-on-child" issue.

Framework: This is legally treated as a Child Protection matter and potentially a major criminal offense or a breach of a "Position of Trust."

Action: Escalated immediately to the Designated Safeguarding Lead (DSL) and external authorities (MASH/Police). If a staff member is involved, the Local Authority Designated Officer (LADO) protocol will be triggered within 24 hours.

3. Both Parties 18 or Older: Adult Abuse and learner Conduct
If an incident occurs between two adult learners (both aged 18 or older), standard child protection frameworks do not apply unless an individual meets the criteria of an "adult at risk."

Framework: Managed via the Behaviour Support and Intervention Policy and corporate disciplinary procedures.

Vulnerable Adults: If the victim is a vulnerable adult with care and support needs, the case is managed under the statutory duties of The Care Act 2014 and escalated to Local Authority Adult Social Care.

29.3 Scope of Abuse
Staff must remain vigilant to the fact that child-on-child and mixed-age abuse can occur inside learning environments, off-site (such as on work placements or industry trips), or wholly online. This includes, but is not limited to:

- Bullying (including cyberbullying, prejudice-based, and discriminatory bullying).
- Sexual violence (rape, sexual assault) and sexual harassment (unwanted online/offline sexual comments, memes, or targeting).
- Consensual and non-consensual sharing of nude and semi-nude images/videos (including AI-generated or altered explicit images/deepfakes).
- Upskirting and initiation/hazing rituals.

Scope & Gender Disparities:
While any learner can be a victim or perpetrator, staff must recognise that for many (though not all) forms of child-on-child abuse and sexual harassment, it is more likely that females will be victims and males will be perpetrators. Staff must remain alert to all forms of abuse, including:

- Physical assault and harm, or the threat of harm with a weapon.
- Harmful sexual behaviour, including misogyny and misogynistic harassment.
- Extra-Familial Harm & Contextual Safeguarding: Recognising that risks, exploitation, and threats of violence frequently occur outside the home, in public spaces, or online.

29.4 Trauma-Informed Response and Support
The RNN Group recognizes that individuals who cause harm may have experienced harm themselves. In all instances across the mixed-age demographic, the Group is committed to providing non-judgmental, trauma-informed support to all parties. Victims will be immediately reassured that they are being taken seriously, and protective measures will be enforced to maintain a safe campus environment while external and internal investigations proceed.

**31. Child Sexual Exploitation (CSE) and Criminal Exploitation of Children (CCE)**
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, the Group 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.

Further information on signs of a child's involvement in sexual exploitation is available in the Home Office guidance: Child sexual exploitation: guide for practitioners

**32. Organised 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.
- 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

**33. Preventing Radicalisation and Extremism (Prevent Duty)**

33.1 Statutory Framework & Risk Context

Under Section 29 of the Counter-Terrorism and Security Act 2015, the RNN Group has a statutory duty to have "due regard to the need to prevent people from being drawn into terrorism" (the Prevent Duty). The Group recognises that radicalisation—the process by which an individual comes to support terrorism and extremist ideologies associated with terrorist groups—can affect individuals of any age, background, or delivery pathway (including 14–16, 16–18, Higher Education, Adult Learners, Apprentices, Subcontracted, and Distance Provision).

In line with statutory guidance, the Group assesses the local and national threat landscape, acknowledging that radicalisation risks encompass:

- **Islamist Terrorism**
- **Extreme Right-Wing Terrorism (ERWT)**
- **Mixed, Unclear, or Unstable Ideologies** (including extreme misogyny/incel culture or conspiracy-driven extremism)

Staff must understand that individuals may demonstrate **susceptibility to radicalisation** through personal vulnerabilities, social isolation, exposure to online extremist material, or ideologically driven propaganda, even in the absence of traditional safeguarding indicators.

33.2 Leadership, Risk Assessment, and Subcontracting

- **Prevent Lead:** The Director of Safeguarding and Student Support serves as the designated **Prevent Lead** for the RNN Group.
- **Prevent Risk Assessment & Action Plan:** The Prevent Lead maintains a live **Prevent Risk Assessment and Action Plan**, which is formally reviewed annually and presented to the Governing Body. This document evaluates campus security, IT networks, external venue bookings, curriculum engagement, and local threat levels.
- **Subcontractors & Employers:** The Prevent Duty extends to all work-based learning, apprenticeships, and subcontracted provision. Employers hosting RNN Group apprentices must confirm during onboarding that they provide a safe working environment free from extremist influences and comply with the Prevent Duty.

33.3 Channel Referral Pathway & Triage

**Channel** is a multi-agency, voluntary early-intervention program designed to support individuals identified as susceptible to being drawn into terrorism.

**Standard Referral Pathway:**

1. **Identify & Record:** Any staff member who observes indicators of extremist engagement, radicalising language, or access to proscribed material must log an immediate concern via the electronic safeguarding reporting system, assigning it directly to the Prevent Lead.
2. **Triage:** The Prevent Lead / Deputy DSL will review the concern, exercise professional curiosity, gather context from relevant teams (e.g., tutors, IT, attendance), and assess against local counter-terrorism risk thresholds.
3. **Police & Channel Liaison:** Where a risk of radicalisation is identified, the Prevent Lead will consult with the local Police Prevent Team / Local Authority Prevent Lead to determine whether a formal **Channel Referral** is required.
4. **Consent & Information Sharing:**
    - Information may be shared with multi-agency partners **without prior consent** for the explicit purpose of assessing risk and preventing crime or terrorism (under UK GDPR Part 2, Schedule 8).
    - If the case is deemed suitable for Channel, the individual (and/or parent/carer if under 18) will be invited to give informed consent to receive tailored support from the multi-agency Channel Panel.

**34. Electively Home Educated**

For learners who are registered as Elective Home Educated with the Local Authority, the RNN Group can offer supplementary learning on a part time basis to these 14 – 16 year-old learners. These learners must have an Additional Learning Support assessment, parents must attend this assessment and complete an agreement of expectations prior to enrolling on our Engage transition course or if a returning learner enrolling onto a curriculum course. Information is shared with Local Authority and any other statutory services involved with the young person.

**35. 16-19 Study Programmes/Adult Entry**

These programmes are designed to provide learners 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 learners 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.

**36. 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 learners 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. Contact will be made when there is a concern for the learner's safety, this may differ depending on the situation but examples could include; suicidal ideation, mental ill health, escalating self-injury, relationships that may be unsafe/dangerous. 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 e.g., illness, a child going missing or a safeguarding concern.
- Full details of any other adult authorised to discuss learner concerns.

The RNN Group will retain this information on its management information systems for the respective period of time. The RNN Group will only share information about learners to individuals or organisations who have the relevant responsibility for the learner. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

**37. 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.

**38. Safeguarding in Sport**

When RNN Group engages with organisations to provide sporting facilities or activities, including those procured through a tender process, we hold them accountable for their safeguarding responsibilities. These organisations must demonstrate that the clubs they host or services they provide have robust measures in place to ensure the safeguarding and welfare of children and young people are a top priority. Our policy requires that all such providers adhere to our high standards for child protection and are able to provide evidence of their safeguarding practices upon request.

Use of External Organisations

RNN Group's policy on the use of external organisations for sporting activities is as follows:

- Due Diligence: All external providers, including those selected through a formal tender process, will undergo a thorough vetting process to ensure they have appropriate safeguarding policies, procedures, and training in place.
- Contractual Obligations: Contracts with these organisations will explicitly state their responsibility for child safeguarding and the promotion of welfare. This includes requiring them to adhere to all relevant statutory guidance and best practices.
- Monitoring and Review: RNN Group will regularly review the safeguarding practices of all external providers to ensure they are consistently meeting the required standards.
- Reporting Concerns: All staff, learners, and parents must be aware of how to report any safeguarding concerns related to external sporting activities. Concerns will be managed in line with the RNN Group's overarching safeguarding policy.

For Organisations Providing Facilities

Organisations that provide facilities for sporting clubs or activities, whether they are a direct service provider to RNN Group or a third-party, have a responsibility to ensure that those clubs have everything in place to ensure the safeguarding of children and the promotion of their welfare is a priority. This includes:

- Verification of Safeguarding Policies: Checking that clubs have up-to-date and effective safeguarding policies.
- DBS Checks: Ensuring that all staff and volunteers who work with children have appropriate and current DBS (Disclosure and Barring Service) checks.
- Training: Verifying that staff and volunteers have received relevant safeguarding training.
- Reporting Procedures: Having clear procedures for reporting and managing safeguarding concerns.

Our expectation is that any organisation we work with will actively champion a culture of safeguarding and will be proactive in their approach to child protection.

## 39. Commercial Outlets, Public-Facing Facilities, and External Speaker Vetting

### 39.1 External Speaker & Event Booking Protocol

To protect learners, staff, and visitors from exposure to extremist ideas or hate speech, all requests to invite external speakers or host external organisations in RNN Group facilities (including commercial outlets, room hires, and public spaces) are subject to a risk-based vetting procedure.

**Procedure:**

1. **Notice Period:** Any event involving an external speaker or external venue hire must be submitted to the Commercial/Facilities/Safeguarding team at least **14 working days** prior to the event date.
2. **Vetting & Due Diligence:** The organiser must provide the speaker's name, topic outline, presentation materials, and organizational affiliations. Checks will be conducted to ensure the speaker or organisation does not promote views that breach British Values, incite hatred, or support proscribed extremist groups.
3. **Risk Mitigation & Cancellation:**
    - Where potential risks are identified, the Prevent Lead may impose strict conditions (e.g., requiring pre-approved slides, setting ground rules, or assigning senior staff to monitor the event).
    - The RNN Group reserves the right to refuse or cancel any booking where the risk of radicalisation, hate speech, or breach of the peace cannot be safely mitigated.

## 40. Learner Taxi Bookings

To ensure the safety and well-being of our learners when travel by taxi is required, the RNN Group maintains a strict policy regarding the booking and use of taxi services.

Key Safeguarding Measures for learner Taxi Bookings:

- Approved Providers Only: The RNN Group will only utilise pre-approved and vetted taxi firms for any learner taxi bookings. These firms undergo rigorous due diligence checks, including verification of driver licensing, DBS checks, insurance, and adherence to safeguarding standards. A list of approved providers is maintained by the Group's transport or administrative department.
- Booking Procedures: All taxi bookings for learners must be made through designated Group staff following established internal procedures. Learners or parents/carers should not book private taxis independently for journeys related to Group activities without prior authorisation and arrangement via the approved channels.
- Emergency journeys - In emergency situations like a trip to A&E or an early departure due to illness, we will use our pre-approved transport providers wherever possible.
- Unforeseen closures - If there is an unexpected closure, for example due to bad weather, and a parent needs to book their own transport, the details must be confirmed with a key member of staff before the learner leaves the premises. This includes a tutor, Director of Campus, or Learning Support Assistant.
- Driver Identification: Learners will be instructed on how to identify their pre-booked taxi and verified driver. This may include confirming the driver's name, vehicle registration, and the booking reference with the learner or accompanying staff member before commencing the journey.
- Journey Monitoring: For vulnerable learners or in specific circumstances, the Group may implement additional monitoring procedures for journeys, which could include confirming pick-up and drop-off times.
- Reporting Concerns: Any concerns regarding a taxi journey, driver conduct, or vehicle safety, whether raised by a learner, parent/carer, or staff member, must be reported immediately to the Designated Safeguarding Lead (DSL) or a senior member of staff. All incidents will be investigated promptly and appropriate action taken.
- Appropriate Vehicle Use: Taxis booked for learners must be appropriate for the number of passengers and any specific needs (e.g., accessibility requirements). Overcrowding is strictly prohibited.
- Communication with Drivers: Drivers from approved firms are briefed on the RNN Group's expectations regarding professional conduct and safeguarding, including maintaining appropriate boundaries and avoiding unnecessary conversation unrelated to the journey.

## 41. 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 candidates successful at interview together with references. Candidates are informed at the point of offer which checks will be carried out, including online searches.

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.
- Online searches for successful candidates (those staff recruited after 1st September 2023).
- 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 establishment in respect of the 'types of work that is undertaken' 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 with the Group. This second consideration will be reviewed on an annual basis to see if the RNN Group still meets the definition of a "Specified Establishment".

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 learners 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 Policies section of the RNN Group Website. Records of all staff are kept confidentially by HR in the single central record.

## 42. Staff Conduct, low level concerns & the use of 'Reasonable Force'

Guidance about acceptable conduct and safe practice is provided to all staff, agency workers, and volunteers during induction and reinforced through the Staff Code of Conduct. This guidance outlines the professional standards and boundaries required in daily interactions with learners.

Low-Level Concerns & Professional Boundaries

A 'low-level' concern is any anxiety, discomfort, or observation regarding the conduct of a staff member, volunteer, or contractor that does not meet the statutory harm threshold, but is inconsistent with the RNN Group Staff Code of Conduct (whether occurring inside or outside the workplace). Examples include boundary blurring, inappropriate or suggestive jokes, informal messaging via personal channels, or unsanctioned line-of-sight exceptions.

The RNN Group fosters an open culture where staff are encouraged to report any behaviour that causes concern, no matter how minor it may appear. All staff concerns follow a single reporting pathway to remove any ambiguity around self-triaging:

Reporting Pathway: All concerns regarding staff conduct—whether minor or severe—must be reported immediately via email to concerns@rnngroup.ac.uk or discussed directly with the Director of Safeguarding and Student Support.

Escalation Exception: If a concern involves the Director of Safeguarding and Student Support, it must be reported directly to the CEO. Concerns regarding the CEO must be reported directly to the Chair of Governors.

Assessment & Resolution: Concerns are jointly assessed by the Director of Safeguarding and Student Support and an HR Business Partner to determine the appropriate course of action. Low-level concerns will be addressed supportively through targeted feedback, training, and line management. If the concern reveals a pattern of behaviour or meets the harm threshold, it will immediately escalate to formal safeguarding protocols, LADO referral, or disciplinary procedures under Appendix 3: Low-Level Concerns Procedure.

For further information please see appendix 3.

Use of 'Reasonable Force'.

Under exceptional circumstances, designated staff are permitted to use 'reasonable force' to safeguard children and young people. Reasonable force encompasses a spectrum of physical interventions used to control or restrain individuals to prevent harm such as injury to themselves, refusal of medical intervention e.g. a distressed or panicked child resists a life-saving injection during anaphylaxis, damage to property or another person through causing disorder—ranging from low-level actions, such as guiding a learner by the arm, to higher-level interventions, such as breaking up a physical fight or restraining someone to prevent immediate injury.

This policy aligns with Section 3 of the Criminal Law Act 1967, which establishes that any person—including members of the public (MOPs) and police officers—may use force that is reasonable under the circumstances to prevent a crime, assist in the lawful arrest of offenders or suspects, or apprehend individuals unlawfully at large.

Any physical intervention executed by RNN Group staff must be legally and operationally justifiable. Staff must ensure that force is applied only when strictly necessary, using the minimum level of restraint required, and that the action taken is proportionate to the specific risk present at the time.

### 42.1 Staff Conduct, Extremist Ideologies, and Low-Level Concerns

**Professional Neutrality and Proscribed Groups:**

All staff, contractors, and volunteers are expected to uphold the Staff Code of Conduct and model fundamental British values (individual liberty, mutual respect, tolerance of different faiths and beliefs, rule of law, and democracy).

- **Low-Level Concerns involving Extremism:** Staff must report any concern—however minor—regarding a colleague's conduct or comments that suggest support for violent extremism, proscribed terrorist organisations, anti-democratic ideologies, or discriminatory/hate-based views.
- **Reporting Procedure:** Such concerns must be reported immediately to the Executive Director of Human Resources or the Principal & CEO, following the *Low-Level Concerns Procedure* detailed in **Appendix 3**.

**43. 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 learners 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 learners 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/ chief Executive Officer or the Executive Director of HR, OD and Marketing in the Principal's absence.

All learners 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 learners 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 learners 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.

**44. 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.
- 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 learners 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.

***45. Training***

All RNN Group staff undergo mandatory safeguarding training as part of their induction, with regular refresher training in line with statutory guidance (Keeping Children Safe in Education).

45.1 Mandatory Safeguarding & Health Awareness Training Schedule:

- Induction & Annual Refresher: All staff receive training on recognising signs of abuse, neglect, radicalisation (Prevent), online safety, and physical wellbeing risks.
- Medical Conditions & Allergy Awareness: Staff receive awareness training on common medical emergencies—including recognising the signs of anaphylaxis, severe allergic reactions, and the location/use of emergency First Aid resources.
- Designated Role-Specific Training: Designated Safeguarding Leads (DSLs), DDSLs, and First Aiders receive specialised higher-level training updated every two years, including advanced medical emergency response and AAI administration.
- Record Keeping: Human Resources maintains centrally audited records of all completed staff training modules via the employee portal.
- 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.
- Training includes information on roles and responsibility relating to filtering and monitoring.
- 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.

**45. 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 or concern that someone may be drawn into extremism 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 learner behaviour and discipline will also be followed. For concerns of a Prevent nature, they should be reported into the Safeguarding Team like all other safeguarding concerns, they may be referred into the Police and/ or MASH for further investigation. The RNN Group uses the local Prevent Referral paperwork to share concerns with the Police.

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 learner'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 learners are aware of the referral should also be included.

For learners 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 learners' 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 deputies and the safeguarding team are all unavailable and they are convinced that a direct report is the only way to ensure the learner'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.

**46. Professional Confidentiality**

A member of staff must never agree with a learner 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.

**47. Records & Monitoring**

The RNN Group maintains up to date and accurate records of all learners 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 learners.

The designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between secondary education and colleges, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, specifically the Data Protection Act 2018 and GDPR.
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

**48. Visitors to the Group premises**

The RNN Group have a signing procedure to ensure that all visitors are known and aware of the Group 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 Attendance and Punctuality.
- RNN Group Visitors Guidelines.
- Feedback and Complaints Policy.
- Behaviour Support and Intervention Policy.
- Freedom of Speech Policy.
- Grievance Policy and Procedure.
- Health & Safety Policy.
- Security Policy.
- Staff AUP.
- Student AUP.
- Health and Wellbeing Policy.
- Lone Workers Policy (Estates).
- Preventing Hidden Labour and Exploitation (Modern Slavery) Policy.
- Anti-Slavery and Human Trafficking statement.
- SEND Policy.
- Prevent Action Plan.
- Recruitment and Selection Policy.
- DBS and Safeguarding Checks Policy.
- Guidance for use of the Reflection Room.
- Fairness, Respect, Equality, Diversity, Inclusion, Engagement (FREDIE) Policy (referring to Single Equality Scheme Duty).
- Whistleblowing Policy and Procedures.

Statutory guidance
RNN Group operates its Safeguarding for All Policy through its acknowledgement and acceptance of its responsibilities set out in the following legislation and guidance:

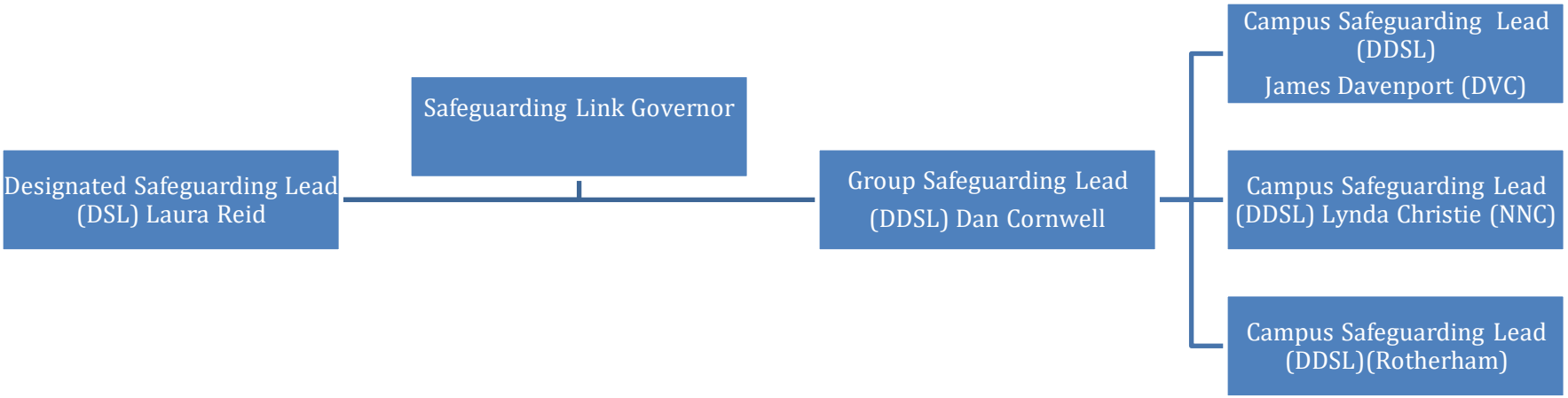
- DfE (updated March 2026) Working Together to Safeguard Children.
- DfE (September 2026) Keeping Children Safe in Education.
- DfE (2021) Relationships Education, Relationships and Sex Education (RSE) and Health Education.
- DfE (2016) 'Disqualification under the Childcare Act 2006'.
- HM Government (2023) Revised Prevent Duty Guidance for England and Wales.
- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'.
- The Human Rights Act 1998.
- The Equality Act 2010.

Non-statutory guidance

- DfE (2026) Allergy safety in schools
- DfE (2018) 'Information sharing: advice for practitioners'.
- DfE (2017) 'Child sexual exploitation'.
- DfE (2016) 'Children missing education'.
- DfE (2018) 'Mental Health and Behaviour in Schools'.
- DfE (2019) 'Teaching Online Safety in Schools'.

**Appendix 2: Safeguarding Team Structure**

**RNN Safeguarding Team**



**Appendix 3: Low Level Concerns *Procedure***

**1. Introduction and Purpose**

At RNN Group, we are committed to creating a safe, supportive, and transparent environment for all learners and staff. A culture of openness is vital to ensuring that safeguarding is everyone's priority. The purpose of this procedure is to provide a framework for reporting and managing low-level concerns. By addressing these concerns early, the Group can proactively support staff, correct well-intentioned but inappropriate behaviours through training, and prevent minor issues from escalating into serious safeguarding risks.

**2. What is a Low-Level Concern?**

A low-level concern is any anxiety or discomfort felt by a staff member, volunteer, or contractor about the behaviour of a colleague that does not meet the harm threshold but is inconsistent with the RNN Group Staff Code of Conduct.

**What it Looks and Feels Like**

Low-level concerns often exist in a "grey area." They are the things that make you pause or feel slightly uncomfortable, even if you cannot quite articulate why.

- **What it looks like (Examples):**
  - Being overly friendly with a learner (e.g., excessive favouritism or informal messaging outside of official channels).
  - Using inappropriate or slightly suggestive language, even if framed as a joke.
  - Inviting a learner into a private space without a clear professional justification.
  - Consistently drifting into personal topics during professional conversations.
- **What it feels like:**
  - A nagging feeling that "something isn't quite right."
  - Believing a colleague's behaviour is unprofessional, even if you think they "didn't mean anything by it."
  - Feeling hesitant to mention it because you worry you are overreacting or being "a snitch."

**Note:** In the majority of instances, these behaviours are entirely well-intentioned. Most often, they represent a slip in professional boundaries that can be easily put right with targeted training and support.

**3. The Harm Threshold: When it is NOT a Low-Level Concern**

It is vital to understand the difference between a low-level concern and a serious allegation that meets the Harm Threshold.

If you witness or hear about behaviour that suggests a colleague poses an immediate risk of harm to a learner, you must not treat it as a low-level concern. You must report it immediately and urgently.

**The Harm Threshold Criteria**

A concern moves from "low-level" to an immediate safeguarding/HR issue if a member of staff has:

- Behaved in a way that has harmed a learner, or may have harmed a learner;
- Possibly committed a criminal offence against or related to a learner;
- Behaved towards a learner in a way that indicates they may pose a risk of harm to students; or
- Behaved in a way that indicates they may not be suitable to work with learners.

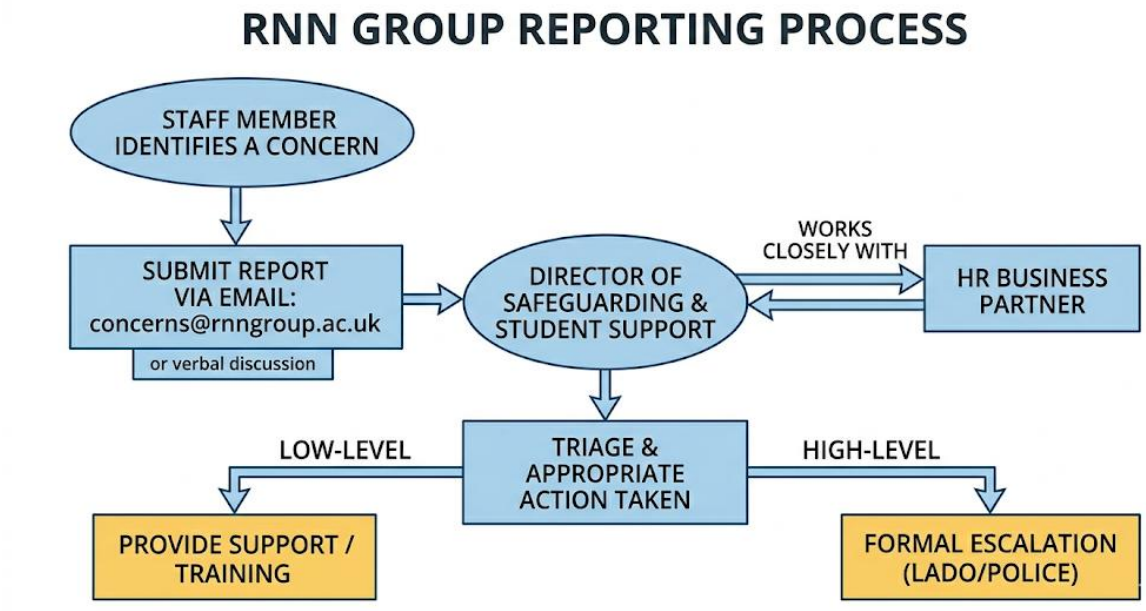
**4. Why Reporting Matters**

Reporting a concern is not about getting a colleague into trouble; it is an essential part of your safeguarding duty.

- **Early Intervention:** It allows the Group to manage behaviour before it becomes a higher risk. Addressing minor boundary blurring early protects both the learners and the staff member involved.
- **The Bigger Picture:** While an incident may seem isolated or minor to you, it could be part of a wider pattern of behaviour. The Group can only identify these patterns if individual concerns are shared. Failing to report leaves a potential blind spot that could pose a risk to individuals and the Group.

**5. The Reporting Process**

Regardless of whether you think the issue is minor (low-level) or severe (harm-threshold), all reports follow the same single pathway. You do not need to self-triage or determine the risk level yourself—the Director of Safeguarding and Student Support and HR Business Partner will handle the assessment.




**Step 1: Initial Report**

All concerns must be emailed to **concerns@rnngroup.ac.uk** or discussed verbally in the first instance with the Director of Safeguarding and Student Support.

- *Note:* If the concern is about the Director of Safeguarding and Student Support, it must be reported directly to the CEO. If the concern is about the CEO it must be reported directly to the Chair of Governors.

**Step 2: Collaboration and Assessment**

Upon receiving the concern, the Director of Safeguarding and Student Support will work closely with a HR Business Partner to review the information. Together, they will determine the risk level and the most appropriate next steps, in most cases this will involve the appropriate line manager.

**Step 3: Resolution**

- **Support & Training:** If the behaviour is deemed a low-level concern (well-intentioned but inappropriate), the staff member will be given constructive feedback and professional training to correct the behaviour.
- **Escalation:** If the review reveals that the behaviour meets the harm threshold or forms part of a dangerous pattern, the matter will be escalated immediately to formal safeguarding, Local Authority Designated Officer (LADO), or disciplinary procedures.

**6. Confidentiality and Support**

RNN Group will handle all concerns with the utmost confidentiality and sensitivity. Staff who report concerns in good faith will be fully supported, and their identity will be protected wherever possible. *Safeguarding is a collective responsibility. Trust your instincts—if it feels wrong, report it.*

**Appendix 4: Procedure for managing Abuse**
(including bullying, cyber-bullying, sexting, sexual violence, up skirting and sexual harassment)

1. Purpose and content

The purpose of this appendix of the Group 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 use the term '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 Group 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
- Harmful Sexual Behaviour (HSB) & Misogyny: Any sexual behaviour, attitude, or expression that causes physical or psychological harm, rooted in or demonstrating hostility, prejudice, or contempt towards women and girls.
- Synthetic Intimate Imagery (AI Deepfakes): The creation, distribution, or possession of nude or semi-nude images/videos created or altered using Artificial Intelligence, managed under child protection protocols regardless of whether the image is real or synthetically generated.
- Cyber-bullying: 'Virtual' bullying using technology (e.g., chat rooms, instant messaging, email and mobile phone) which can occur in or outside the Group. 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 within the Group. 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 (The Group will consider 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) 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.'

Staff must never dismiss reports of sexual violence or harassment as "banter," "just having a laugh," or "boys being boys." Allowing these attitudes to go unchallenged leads to a culture of misogyny and prevents victims from coming forward. For many forms of peer abuse, females are statistically more likely to be victims and males perpetrators.

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 Group 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 (teenage relationship abuse) 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 Group 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/ learner Support 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 Group premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the learner 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 Director 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/or CPOMs as appropriate 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 Director 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 Group 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 5: Office for Students (OfS) Condition E6: Harassment and Sexual Misconduct in Higher Education**

The RNN Group is committed to providing a safe, respectful, and inclusive environment for all learners and staff, especially within our Higher Education (HE) provision, including University Centre Rotherham (UCR) and other HE offerings across the Group. In alignment with the Office for Students (OfS) Condition E6, we take proactive and credible steps to prevent and respond effectively to all forms of harassment and sexual misconduct.

5.1 In-House Management, Distinct HE Pathways, and Statutory Overrides
While the RNN Group maintains a unified commitment to campus safety, Higher Education (HE) adult learners are subject to a distinct regulatory pathway under Office for Students (OfS) Condition E6.

- Independent HE Pathways: Disclosures of harassment or sexual misconduct involving adult HE learners (aged 18+) will be managed and supported in-house by the HE Safeguarding and Support team in the first instance. The Group will not involve external agencies unless specialised support is explicitly requested by the learner (e.g., Police or Sexual Assault Referral Centres).
- Privacy and Autonomy: Adult HE learner disclosures do not automatically default into statutory local authority MASH reporting pathways. This separation respects the adult learner's legal autonomy, privacy, and consumer rights.
- MANDATORY STATUTORY OVERRIDE: Notwithstanding the above, the HE pathway is immediately overridden by statutory Child Protection protocols if:

1. The victim or alleged perpetrator is under 18 years of age (including under-18 HE enrolled learners); or
2. The disclosure involves an adult at risk with care and support needs under The Care Act 2014; or
3. There is an immediate, severe life-safety risk or evidence of an ongoing threat to the wider community.

In such instances, standard statutory escalation protocols to Children's Social Care (MASH), Adult Social Care, or the Police take immediate precedence over in-house HE mechanisms.

5.2 Trauma-Informed Framework and Independent Support Networks
All HE disclosures and formal reports are managed through a specialised, trauma-informed framework that prioritises the learner's agency and well-being.

- Independent Advocacy and Signposting: HE learners affected by harassment or sexual misconduct will be immediately connected to support networks. This includes Mentors, confidential counselling services, and external specialist advocacy agencies (e.g., local sexual assault referral centres).
- In strict compliance with OfS regulations, the RNN Group completely prohibits the use of Non-Disclosure Agreements (NDAs) in relation to any complaints or allegations of harassment and sexual misconduct. learners will never be restricted from sharing their experiences or seeking external support.

5.3 Academic Adjustments and Consumer Protections
To protect the academic continuity and success of learners going through a disclosure or an active investigation, the Group will implement rapid, non-punitive Academic Adjustments. These are

designed to minimise academic disadvantage and are entirely separate from disciplinary outcomes. Adjustments may include, but are not limited to:

- Changes to timetables to prevent contact between parties.
- Formally agreed extensions for assessments, coursework, or exams without penalty.
- Supervised alternatives for exams or practical modules.
- Authorised, temporary leaves of absence with protected status regarding tuition fees and learner finance configurations.

5.4 Fair, Impartial, and Distinct Disciplinary Investigations

When an HE learner chooses to progress a formal internal complaint, the process is handled under a dedicated, impartial HE non-academic misconduct pathway.

- Both the reporting learner and the responding party will be kept clearly informed of the timelines, key milestones, and the final outcomes of any investigation, including any institutional sanctions applied, ensuring total transparency.

**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 learners in this age group attending a further education course and young people aged 14 –16 who attend at the Group as part of a school links course. The term 'learner' for this policy covers all individuals who study within the Group or at any of the outreach/ community centres. The policy also covers those learners who are on placement as part of their course and school links learners. In addition, it covers learners visiting the Group 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.
- 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 take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
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.
- 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.
- 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.
- 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**
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.

- 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 learners will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the RNN's student Behaviour Support and Intervention Procedures. Staff recognise that in some situations, individuals who have caused harm may have also been harmed themselves. Non-judgemental support is offered to all parties involved. The most important thing is to prioritise the well-being of all involved and ensure everyone feels respected and heard.

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.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate

**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.

**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.

**Teenage Relationship Abuse**
Teenage relationship abuse is a pattern of controlling, coercive, threatening behaviour, violence, or abuse within a current or former intimate relationship between young people. It is a form of domestic abuse that involves one partner attempting to gain or maintain power and control over the other.
This abuse is not limited to physical harm; it also encompasses:

- Emotional and Psychological Abuse: Including extreme jealousy, constant monitoring (online or in person), isolation from friends and family, humiliation, put-downs, and threats (including threats of self-harm).
- Controlling and Coercive Behaviour: Such as dictating clothing, checking digital devices, or controlling finances/access to money.
- Sexual Abuse: Including unwanted sexual contact, pressuring for sex, or non-consensual sharing of intimate images.

**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.