

Policy 9A
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This policy should be read in conjunction with First Rung's:

- First Rung E-Safety policies
- Prevent Policy
- Staff Disciplinary Policy
- Staff Code of Conduct
- Guidance on Staff Behaviour Policy
- Recruitment Policy
- Safer Recruitment Policy
- Communications Policy (including ICT and mobile phone usage)
- Learner Acceptable Use of Computer Equipment Policy
- Learner Behaviour Policy
- Equality and Diversity Policy
- Online Safety Policy
- Anti-Bullying Policy
- Social Media Policy (including photography)
- Whistleblowing policy

Policy 9A - First Rung Safeguarding, Child Protection and Adults at Risk Policy.

1.Introduction

The trustees and staff at First Rung recognise that young people and vulnerable adults have a fundamental right to be protected from abuse and exploitation and that learners cannot study effectively unless they feel and are safe. We place a strong emphasis on prioritising and promoting the safeguarding and protection of children, young people, and vulnerable adults from harm.

First Rung is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering them support and protection. We have a legal and moral responsibility to implement rigorous procedures, to provide a duty of care to

young people and vulnerable adults, to safeguard their wellbeing and to protect them from abuse. This policy stipulates that it is the duty of all staff to work together to report and respond to concerns about the welfare and safety of young people and vulnerable adults. It is essential that everybody working in First Rung understands their safeguarding responsibilities. First Rung also recognises its duty to work with external agencies to ensure that potential risk of abuse or exploitation is properly reported, and immediate action taken.

First Rung's safeguarding policy and practice encompasses both child and adult protection and a preventative approach to keeping learners and apprentices safe. This includes early intervention and supporting learners who present with a wide range of concerns, including difficulties with emotional and mental health, abuse and bullying by their peers, sexual harassment and violence and child criminal exploitation. We are committed to ensuring that learners are safe online and aware of the risks associated with radicalisation and extremism.

2. Definition of safeguarding and promotion of learner welfare

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2022 as:

- protecting children from maltreatment.
- preventing the impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes. Abuse (physical, emotional, sexual or neglect) is a form of maltreatment of a child, young person, or vulnerable adult. An individual or individuals may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others, for example via the internet. They may be abused by an adult or adults, or another child or children. There is increased focus on the harm which can be caused through peer-on-peer harassment and violence of both a physical and sexual nature.

3. Purpose of Policy

2.1 First Rung recognises its safeguarding responsibilities to all its learners and staff. Drawing on the guidance and legislation detailed in Appendices the purpose of this policy is to:

- Set out the framework to safeguard children, vulnerable adults, and any learners to promote their welfare and safety.
- Outline the responsibilities within First Rung in relation to safeguarding child and vulnerable adults in line with current legislation, guidance, and best practice.

3. Scope

This policy concerns the safeguarding of all learners at First Rung's Colindale and Ponders End sites. The policy scope includes apprentices, learners on work placement or those undertaking any other form of authorised off-site activity.

The policy applies to all staff, agency staff, volunteers, trustees, and anyone working on behalf of First Rung. This includes employers offering work placements, transportation companies and contractors with direct access to children, young people, and vulnerable adults. In terms of definitions:

- a child is defined as anyone who has not yet reached their 18th birthday.
- a young person is defined as between 12 and 20.
- a vulnerable adult or adult at risk is a person aged 18 or over 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Law Commission Report 1997)

4. Policy statement

Section 175 of the Education Act (2002) requires local education authorities and the leaders of maintained schools, further education First Rungs, and training providers (such as First Rung) to make arrangements to ensure that their functions are carried out in a way that safeguards children and young people and promotes their welfare.

First Rung's ethos is to provide a safe and welcoming environment for learners, staff, and visitors at each of its sites. It is committed to promoting a culture of vigilance where young people and vulnerable adults can learn and be safe. First Rung prioritises its duty to safeguard and promote the welfare of learners and apprentices and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency. Staff are supported to understand vulnerability and risks among First Rung community and how to effectively identify and report these to the safeguarding team.

In accordance with the Counterterrorism and Security Act (2015), there is a statutory duty on First Rung to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty. To fulfil this duty, First Rung liaises closely with the local and regional Prevent leads to receive updates regarding local concerns and where necessary to refer learners to the Channel process. This priority is detailed in First Rung's Prevent Strategy and Prevent Risk Assessment and Action Plan.

5. Safeguarding legislation, statutory guidance, and departmental advice

This policy is underpinned by two key pieces of statutory guidance:

- **Keeping Children Safe in Education (KCSIE) 2022**
- **Working Together to Safeguard Children, July 2018**

First Rung is committed to working in partnership with external agencies to perform its duties under the Education Act 2002, Children Act 2004, Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021.

The policy is informed by and meets the requirements of the following:

Children's Safeguarding and Child Protection

- Keeping Children Safe in Education (KCSIE 2022)
- Sexual violence and sexual harassment between children (2021)
- Guidance for Safer Working Practice in Education Settings (2020)
- Mandatory reporting of female genital mutilation: procedural information (updated 2020)
- Inspecting Safeguarding in Early Years, Education and Skills Settings (2019)
- Working together to Safeguard Children (2018)
- Information sharing: advice for practitioners providing safeguarding services (2018)
- Mental health and behaviour in schools (2018)
- Sexual violence and sexual harassment between children in schools and First Rungs (2018)
- Promoting the education of looked- after children and previously looked- after children: Statutory guidance for local authorities (2018)
- Criminal exploitation of children and vulnerable adults: county lines (2018)
- Children and Social Work Act 2017
- What to do if you're worried a child is being abused: advice for practitioners (2015)
- Children and Families Act 2014
- Preventing youth violence and gang involvement (2013)
- The Children Act 2004
- Education Act 2002

Adults at risk

- The Care Act 2014 – statutory guidance
- Safeguarding Vulnerable Groups Act 2006

Preventing radicalisation and extremism

- Prevent Duty Guidance for Further Education Institutions (2019) updated April 2021
- The Prevent Duty (2015) updated April 2021
- Counter Terrorism and Security Act 2015

Safer recruitment

- Sexual Offences Act 2003
- Disclosure & Barring Service 2013

6. Types of abuse

There are four types of abuse that children may be subject to. These are:

- Physical
- Emotional
- Sexual
- Neglect

Vulnerable adults may be subject to the following forms of abuse:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse

- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission.
- Self-neglect

7. Partnership with Parents and Carers

First Rung recognises the contribution that parents and carers can making in keeping children safe. First Rung will always seek to ensure that its approach to safeguarding is clear to parents. We are committed to working in partnership with and carers to keep learners safe.

8 SEND

Research shows that learners with additional and special educational needs (SEN) are more vulnerable to abuse, exploitation and other safeguarding concerns. This is because of the way that SEN can affect processing, cognition, and communication. Learners with SEN may have greater need in the areas of comprehension, communication, weighing up information and making judgements which can leave them open to being taken advantage of. At First Rung we take the safety of our SEN learners very seriously. We actively work with them, their families, and caregivers to ensure that their comprehension and communication needs are met, and learners feel safe. Staff use appropriate communication methods and visual resources to remove barriers to disclosure and ensure that learners are able to communicate their experiences or concerns. Their main programmes are planned holistically so that alongside their academic and skills development, learners also progress in their ability to advocate for themselves and communicate clearly with those around them.

9, Children missing in education

A child missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation, or radicalisation. First Rung monitors attendance carefully and addresses poor or irregular attendance without delay. A young person (14-16) joining First Rung must be placed on the Arbor register at the beginning of the first day of attendance. Should the young person not arrive at First Rung, his/her parent(s)/carer(s) must be contacted immediately. Where the young person's absence cannot be accounted for and his/her whereabouts cannot be established, the Referral School should be informed. When a 14-16-year-old learner leaves First Rung before the completion of the programme of study the Referral School must be informed immediately. In addition, it may be appropriate to highlight any contextual information concerning a vulnerable young person who is missing education, especially in the case of safeguarding concerns which must be reported.

10. Looked after children (LACs)

First Rung recognises that learners in the care system, looked after children (LACs) and care leavers (CLs) may potentially be more vulnerable or more at risk than other learners. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. Staff are aware of the vulnerabilities of Looked After Children and Care Leavers and plan carefully to support and provide appropriate interventions for Looked After Children and Care Leavers. First Rung liaises with social workers, local authorities, and virtual schools to monitor the progress of Looked After Children and Care Leavers where there are concerns about their attendance, progress, or safety.

11. Supporting Learners' mental health and wellbeing

First Rung has in place pastoral support systems that reflect the organisation's legal obligation and commitment to safeguard and promote the welfare and wellbeing of all learners as outlined in KCSIE (2022). First Rung recognises the value of early help, early intervention and coordinated support through full cooperation with interagency working arrangements.

First Rung will support learners to be successful and feel confident in terms of their:

- Physical, mental health and emotional wellbeing
- Protection from harm and neglect
- Education, training, and recreation • Contribution to society
- Social and economic wellbeing

First Rung provides clear guidance on how best to the varied needs of different learner First Rungs, including the engagement and support to those deemed as vulnerable.

12. Safeguarding apprentices and learners on work placement

We recognise that we have a particular responsibility to ensure the safeguarding of our apprentices and learners on work experience as they spend most of their time in the work setting. When developing an apprenticeship or work placement, we carry out a safeguarding risk assessment on the employer and ensure they have appropriate safeguarding arrangements in place. We also provide the employer with an induction to First Rung's Safeguarding Policy and secure their formal agreement to comply fully with all of its provisions.

Apprentices and learners on work placement are provided with a full induction to safeguarding policy of the work setting and are required to comply fully with it as part of their apprenticeship agreement. Employers are required to report any safeguarding concerns they may have, relating to the apprentice, to First Rung. Apprentices and learners on work placement are encouraged to immediately report any safeguarding concerns they may have in relation to their work setting. Safeguarding is also covered as an issue at all visits carried out by First Rung staff to the work setting. In addition, apprentices are asked if they are any safeguarding concerns at their regular progress reviews.

Employers are expected to ensure appropriate initial and refresher safeguarding training has been provided for their staff. This may necessitate the service provider undertaking the training offered by First Rung.

11. Criminal convictions

All enrolling learners will be asked whether they have any criminal convictions, cautions, reprimands, final warnings, or prosecutions pending, or whether they have been released by the police subject to investigation or are under youth triage or on police/court bail. How we ask this question will be reviewed to ensure that it does not deter learners from disclosing. An individual risk assessment will be done by the campus safeguarding lead before a learner who declares is enrolled. The main purpose of this risk assessment is to ensure that we can put support in place to support the learner at First Rung. However, we will also ensure that we are assessing any risks to First Rung community, and we do reserve the right to refuse to enrol a learner. Where data sharing agreements exist with local police, we will check the conviction with our police in order that we are fully informed regarding the case.

All reported safeguarding concerns about apprentices will be considered by the Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Lead (DDSL) with appropriate action being taken where deemed necessary. Where necessary, First Rung will work in collaboration with other stakeholders including local authorities, police, employers, and parents/carers.

13 Keeping safe online.

First Rung reviews its approach to online safety annually and its response to the growing dangers faced by young people and vulnerable adults, through safeguarding training, awareness raising activities aimed at learners, First Rung's Acceptable Use Policy and issues as identified in KCSIE (2022) The range of issues classified within online safety is considerable, but can be categorised into four key areas of risk:

- *Content*: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- *Contact*: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- *Conduct*: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- *Commerce*: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

8. Safeguarding arrangements

First Rung has a Designated Safeguarding Lead (DSL) who is a member of the senior management team and has overall responsibility safeguarding matters across the

organisation. The DSL role is currently carried out by the Deputy Chief Executive and includes the following duties:

- maintaining links with local multi-agency safeguarding agencies
- providing advice, guidance, and training for staff on safeguarding issues
- managing agency referrals, such as those made to Social Services and Channel
- maintaining robust records of safeguarding incidents including the actions taken and when the case has been signed off as completed.
- ensuring a robust system for monitoring vulnerable students
- holding details of the local authority Personal Advisor that has been appointed to guide and support students who are care leavers and liaising with them as necessary regarding any issues of concern affecting the care leaver.
- providing an annual report to the Board of Trustees on safeguarding issues
- ensuring that organisation safeguarding policy is known, understood, and used appropriately.
- reviewing the safeguarding policy at least annually
- ensuring all staff training and safeguarding teams is up-to-date and relevant.
- liaising with the nominated Safeguarding Trustee

The DSL is supported by the Deputy Designated Safeguarding Lead (DDSL) who is currently the Head of Centres and Inclusion.

Both the DSL and the DDSL form part of the First Rung Safeguarding Team along with the Colindale and Ponders End centre managers and the ICT Lead who acts as Online Safeguarding Officer. The team deal with all safeguarding issues that are identified within the organisation.

9. Staff Responsibilities

Safeguarding is the responsibility of all First Rung staff, trustees, and volunteers.

- All members of staff must develop their understanding of the signs and indicators of abuse and their responsibility for referring any concerns.
- All new members of staff must receive a copy of First Rung safeguarding and child protection procedures as part of their First Rung induction.
- All members of staff must read Keeping Children Safe in Education and sign the declaration that they have.
- All members of staff must read the Safeguarding Policy and Annex and/or be aware of where to use it as a reference. The safeguarding team will support staff in understanding of these key documents and implementing it in their practice.
- All staff must attend relevant all staff safeguarding training.
- All members of staff must know how to respond to a learner who discloses abuse.

10. Procedures to follow in the Event of a Disclosure or Suspicion of Abuse

All complaints, allegations or suspicions must be taken seriously when there is a possibility that abuse, or considerable harm may be involved. Staff should remain calm and reassuring

throughout any discussions with a learner who is disclosing abuse, suspected abuse or issues which may (or may not) be below the threshold of the definition of abuse. Learners (or anyone making the disclosure) should always be reassured and listened to.

Under no circumstances should staff promise confidentiality to a learner who is declaring abuse or suspected abuse. Under no circumstances should staff make decisions whether the disclosure is under the threshold. **Having recorded the details of the concern or allegation they must always refer the matter to the safeguarding team.** The staff member should explain that if what the learner wishes to say or has said relates to the learner's own safety or that of another person, then the staff member will have to inform First Rung's Designated Safeguarding Officer.

10.1. Dealing with a disclosure or concern

When dealing with a disclosure, the following communication and recording method should be followed:

Receive

- What is said
- Accept what is said.
- Listen without displaying shock, disbelief, or opinion.

Reassure

- the learner
- Acknowledge their courage in reporting it.
- Do not promise confidentiality.
- Remind them that they are not to blame – avoid criticism of the alleged perpetrator.
- Do not promise that “Everything will be alright now” (it may not be)
- Try to remain neutral.

React

- Respond to the learner but do not interrogate.
- Avoid leading questions but ask open ended ones.
- Seek clarification from the learner.
- Explain the next steps.

Record

- Make notes as soon as possible (during the meeting if possible)
- Use the learner's own words – do not assume – ask e.g. “Please tell me what xxxx means?” Describe observable behaviour and appearance.
- Do not destroy any original notes – these should be given to the senior manager or police dealing with the case.

Support

- Consider what support needs of the learner and contact the relevant safeguarding staff.
- Such incidents can be stressful and time-consuming. If dealing with such a situation the member of staff should feel free to speak to a manager, a member of the Senior Management Team (SMT) or someone from HR or indeed any colleague with whom you feel comfortable discussing the matter.
- If necessary, the designated safeguarding officer will take responsibility for the matter and will take all necessary actions.

It is strongly recommended that during any disclosure interview you stick to the following line of questioning:

- Name and date of birth of learner
- Date, time, and location of incident
- Names of people present and relationship (if any) to learner.
- A description of the incident / events Finish by asking the learner: is there anything else you wish to tell me?

10.2. Dealing with Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of learners. However, information about safeguarding should only be shared on a need-to-know basis, as advised by the safeguarding team and/or external agencies. Any personal and sensitive data should be processed in accordance with the terms of Data Protection legislation as amended by GDPR and as interpreted in First Rung's data management, storage, retention, and related policies.

11. Allegations relating to staff and/or volunteers

First Rung will deal immediately and urgently with any safeguarding allegations or concerns regarding a member of staff. The type of allegations involved are ones where the staff member concerned may have:

- 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; or
- behaved towards a learners or learners in a way that indicates that they are unsuitable to work with children, young people, or vulnerable adults.

Process to be followed:

- Where a learner raises a concern, inform the Chief Executive. In the absence of the Chief Executive the Chair of the board should be informed.
- Should staff have concerns about another member of staff, they must take these to the Chief Executive directly. In the absence of the Chief Executive the Chair of the Chair of the board of trustees should be informed.

- If the Chief Executive is the subject of an allegation the matter must be referred to the Chair of board who will inform the Local Designated Officer or team of Officers.
- Every effort to maintain confidentiality and guard against unwanted publicity will be made.

The Chief Executive will seek advice within one working day from the local authority Designated Officer (LADO), or team of officers giving the content and context of the allegation and agree a course of action, including any involvement of the police. Discussions will be recorded in writing and communication with both the individual and the parents / carers of the child/children agreed. Careful consideration will be given to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The organisation will make every effort to ensure confidentiality.

The organisation will not undertake its own investigations without prior consultation with the local authority Designated Officer, or team of officers, or in the most serious cases, the Police.

The following procedures must be followed in recording a child's allegation or concern concerning a staff member or volunteer:

- The learner should be listened to but not interviewed or asked to repeat the account.
- Avoid questions, particularly leading questions.
- Avoid offering alternative explanations for the learner's worries.
- Avoid interrupting the learner.
- Note all information carefully, including timings, settings, who was present, what was said using the learner's own words.
- Do not make assumptions about what the learner is saying.
- The person making the written record must sign and date it.

Learners under 16 years old who are enrolled at schools or other organisations are, in normal circumstances, also subject to the policy of the referring organisation, however, in urgent situations First Rung safeguarding staff will contact external agencies without delay and then coordinate with the sending institution.

The learner's allegation(s) and concern(s) will then be investigated thoroughly by the DSL or DDSL reporting to the DSL. Where the allegation(s) or concern(s) are substantiated, appropriate sanctions will be applied. These include:

- dismissal of staff member or volunteer concerned.
- non-renewal of a fixed term contract.
- no longer engaging/refusing to engage a temporary staff member provided by an agency.
- terminating the placement of a learner teacher or other trainee
- no longer using staff employed by contractors.
- no longer using volunteers provided by particular placement agencies.

Where the allegation(s) or concerns(s) are substantiated, the staff member or volunteer concerned will be reported to the DBS. Where a crime is judged to have potentially occurred, the matter will be referred to the police.

12. Low level concerns about staff members

As part of their organisation approach to safeguarding, schools, colleges, and training providers are expected to ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school, college, or training providers (including freelance staff, supply tutors, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- encourage an open and transparent culture • enable schools and colleges to identify inappropriate, problematic, or concerning behaviour early.
- minimise the risk of abuse, and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within
- minimise the risk of abuse and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

12.1 What is a low-level concern?

Since September 2021, KCSIE has required education providers to record and report low level concerns that may exist about staff members. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
 - being over friendly with children • having favourites
 - taking photographs of children on their mobile phone, contrary to school policy
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating learners.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

12.2. Sharing low-level concerns

If you have any concerns, doubts, or uneasiness about the conduct of a First Rung Staff member, volunteer or an outside person engaged by the organisation, you must immediately inform a member of the Safeguarding Team. We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. We create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the First Rung's safeguarding system.

12.3, Action to deal with low level concerns

Following an investigation of the concern raised, the DSL/DDSL should then review the information and determine whether the behaviour:

- is entirely consistent with their staff code of conduct and the law.
- constitutes a low-level concern.
- is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.
- when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation, and should be referred to the LADO / other relevant external agencies, or
- with the additional information shows that the concern itself now meets the threshold of an allegation and should be referred to the LADO / other relevant external agencies.

Consideration should be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again. It is important that the DSL/DDSL makes appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern and all those discussions held as part of the investigation into the matter.
- all external conversations – for example, with the LADO/other external agencies
- their determination
- the rationale for their decision
- any action taken/recommendations made.

12.4 Recording a low-level concern.

All low-level concerns must be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records relating to low level concerns will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see KCSIE 2022 for more information).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate conduct can be identified. Where a pattern of such conduct is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO and further advice will be taken. The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation/concern if that is longer, at which point the record will be securely destroyed.

13. Procedures in the Event of a Sexual Harassment, Sexual Assault or Rape disclosure

First Rung has a zero-tolerance policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images. We are committed to supporting learners who experience any form of sexual abuse, including online abuse. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE (2022), victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'.

First Rung takes the report of any sexual abuse, assault, or rape extremely seriously and supporting learners who have been the victims of such crimes quickly, effectively, and sensitively is of paramount importance to the organisation. First Rung has delivered a range of training to all staff to ensure that the organisation is in a position to support learners who experience or are the victims of sexual harassment, sexual assault and rape.

First Rung provides staff with training support that enables them to identify and address any inappropriate behaviour. Learners also access training provision that develop their understanding of consent, safe relationships and reporting sexual violence and crimes against them.

Staff are aware they must follow all reporting procedures, as set out above, including in the cases of disclosures of Sexual Assault or Rape, the additional steps:

- Call the DSL or DDSL immediately The DSL or DDSL must call the police immediately.
- The Police must be called within ONE HOUR
- SMT and the Safeguarding Trustee must be made aware.
- Support for the learner (or learners in the case of child-on-child abuse) must be put in place or offered.

14, Dealing with Allegations of Abuse: Child-on-Child Abuse

First Rung actively works to minimise the risk of child-on-child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. First Rung ensures, through regular training, that staff are alert to any signs of it and are confident in challenging unacceptable behaviour immediately and following First Rung's processes. In line with KCSIE 2022 (2022), First Rung should ensure that both victim and perpetrator and any others involved are well supported.

First Rung recognises that learners are vulnerable to abuse by their peers. There are many forms of child-on-child abuse. It can be physical, emotional, sexual and/or financial and can impact any young person, although the characteristics/experiences of some can be exploited by their peers, making them more vulnerable to abuse than others.

Clearly, child-on-child abuse should never be tolerated or passed off as “banter” or “part of growing up” and such abuse is subject to the same child protection procedures as abuse by adults. While bullying, fighting and harassment between young people are not generally seen as child protection issues, a learner’s behaviour may be regarded as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the 14 young people concerned: or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

Examples of child-on-child abuse that may be regarded as safeguarding concerns include, but are not limited to, (online) bullying, gender-based violence, sexual assaults, and ‘sexting,’ sharing of nudes and semi nudes without consent.

First Rung’s procedures to minimise the risk of child-on-child abuse include:

- Vigilance – staff and learners have a clear method of making referrals to the Safeguarding Team.
- Referrals – where concerns about learners are raised by staff or other learners, these are fully investigated. Where necessary, the First Rung Disciplinary procedure is enacted.

All staff should

- Be vigilant to child-on-child abuse and be aware of the potential uses of information technology for bullying and abusive behaviour between young people, including the sharing of nudes and semi-nudes.
- Be aware of the added vulnerability of young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children or young people.
- Be aware that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to others. Be aware of appropriate actions. Where concerns have been raised regarding [on-line] bullying, fighting and harassment, staff should follow the disciplinary procedures identified in First Rung’s Anti Bullying and Harassment Policy. However, where there are concerns raised or disclosures of abuse (such as, but not limited to, gender-based violence, sexual harassment, sexual assaults, and ‘sexting’).

15. Recording safeguarding concern

Concerns about learners should be recorded on First Rung’s Arbor learner management platform and the First Rung central ‘at risk’ register. The register will keep a log of all events and actions to the concern including communication with parents/carers and external agencies. A confidential safeguarding file will also be set up for each learner to hold key documentation such as referrals to Children’s Social Care and Child Protection Conference and First Rung meeting minutes. Records should be signed and dated and kept in chronological order.

First Rung actions minuted in child protection conferences/strategy meetings must be implemented. Recording is a tool of professional accountability and is central to safeguarding and protecting learners. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason, it is vital that

concerns are recorded accurately so that they can be monitored, and emerging patterns noticed.

Where a learner is transferring to another provider, First Rung's Designated Safeguarding Lead should liaise with First Rung or establishment and forward them copies of the learner's safeguarding records.

16. Safeguarding training for First Rung staff

Safeguarding our learners is a key priority for First Rung and we are committed to ensuring that all staff are well trained and feel confident to carry out their safeguarding duties and responsibilities. First Rung's nominated designated safeguarding staff undergo a dedicated induction course and refresher training every two years. Ongoing safeguarding training as new guidance and local and national priorities emerge will be undertaken to ensure they are aware of current safeguarding issues and best practice.

All staff will undertake initial (induction) Safeguarding, Child protection and Adults at Risk and Prevent Duty training; they will undertake to ensure that their training is refreshed on an annual basis. The responsibility of ensuring that all staff employed by First Rung receive appropriate training rests with First Rung Director Human Resources. 8.5 A central record of mandatory Safeguarding staff training is held with First Rung's HR team.

Organisations which provide a service on behalf of First Rung such as security, catering, hourly paid teaching, or support staff are

17. Safer Recruitment and Staff Appointments

First Rung is committed to the process of maintaining a culture of safer recruitment and adopting recruitment processes that will help to deter, reject, or identify unsafe adults who might abuse learners or who are unsuitable to work with them. First Rung is committed to evidencing this practice in relation to all staff working with learners in First Rung. All managers and staff involved in recruitment will undertake appropriate safer recruitment training so as to ensure that they are following the required processes.

All staff recruited to First Rung will be subject to appropriate identity, qualification, and health checks. References will be verified, and enhanced Disclosure and Barring Services (DBS) checks will be undertaken in accordance statutory guidance and codes of practice as issued by the DBS. It is First Rung's policy to undertake DBS re-checks every three years First Rung will continue to uphold best practice in safer recruitment as outlined in KSCIE 2022.

All applicants for employment are required to complete either an approved application form or a CV, which requires them declare if they have a criminal conviction. First Rung reserves the right to decline any applicant who fails to answer the question. First Rung shall consider taking disciplinary action in accordance with the staff disciplinary procedures if it is discovered that a member of staff has provided false or incomplete information as part of the recruitment process.

First Rung will only use employment agencies which can demonstrate that they have carried out pre-employment checks on their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the Local Authority's Designated Officer (LADO). Staff joining First Rung on a permanent or temporary basis will be given a copy of

this policy or the executive summary and contacts for First Rung where they work. Additionally, induction briefings will include safeguarding procedures, the Staff Code of Conduct, and the allegations against staff procedures within First Rung.

All learners and applicants for admission to a programme of study offered by First Rung are required to complete either an approved application form or an enrolment form, which requires them declare if they have a criminal conviction. As applicants are required to disclose details of criminal convictions, First Rung reserves the right to decline any applicant who fails to answer the question. First Rung shall consider taking disciplinary action in accordance with the learner disciplinary procedures if it is discovered that a learner has provided false or incomplete information as part of the enrolment process. Where it is revealed that during a course a learner has obtained a criminal record and not disclosed this, First Rung may consider appropriate disciplinary action, dependent on the severity and impact of the disclosure.