

Rochdale Training's Safeguarding Policies



Review Date:	Reviewed By:	Next Review Date:
March 2022	R Yates	September 2022
September 2022	R Yates	September 2023
September 2023	R Yates	September 2024

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[A Guide to Anti-Cyberbullying](#)

What is Cyberbullying?

Cyberbullying is the use of information communication technology (ICT), particularly mobile phones and the internet, deliberately to upset someone else.

Please see below some key safety advice:

- Always respect others – be careful what you say online and what images you send.
- Be careful what content you download.
- Think before you send – whatever you send can be made public very quickly and could stay online forever.
- Treat your password like your toothbrush – keep it to yourself. Only give your mobile number or social media details to trusted friends.
- Block the bully – learn how to block or report someone who is behaving badly.
- Do not retaliate or reply!
- Save the evidence – learn how to keep records of offending messages, pictures or online conversations
- Keep your privacy settings on.
- Make sure you tell:
 - Your tutor, parent, carer or adult you trust or call a helpline like Childline on 0800 1111 in confidence;
 - The provider of the service; check the service provider’s website to see where to report incidents
 - Your Safeguarding Officers at Rochdale Training:

Rachel Yates
Operations Manager:

Landline: 01706 631417 ext 159

Mobile: 07860 919379

Email: safeguarding@rochdaletraining.co.uk

Josh Harper
Level 3 Engineering Mentor

Landline: 01706 631417 ext 155

Mobile: 07377 400379

Email: safeguarding@rochdaletraining.co.uk

Finally, don’t just stand there – if you see cyberbullying going on, support the victim and report the bullying. How would you feel if no one stood up for you?

This guide should be read in conjunction with the ICT Acceptable Usage Policy

ADMINISTRATION OF MEDICINES POLICY

1. Introduction

This guidance is designed to help Rochdale Training develop effective management systems to support individual learners with medicinal needs who require access to their medicines whilst in training and work. There is a legal right to safely self-medicate.

It is generally accepted that it is in the learner's best interests to be in training for as much time as possible and that the administering of medicines should not become a barrier to accessing training. Similarly, staff should be able to undertake their employment duties without restriction, notwithstanding their health needs. Rochdale Training aims to support all parties with medical needs.

This guidance is not a definitive interpretation of law. However, the Equality Act 2010, Health & Safety at Work Act, Corporate Manslaughter and Homicide Act, Mental Capacity Act and Medicines Act are relevant.

2. Staff with Medicinal Needs

A number of staff may take medication either on a short term or long term, permanent basis. Each person is responsible for the taking of and securing of their own medication. It is their responsibility to alert Management to their needs if the taking of the medication or indeed, the missing of a needed dose may affect either their safety or their work.

Rochdale Training will support all members of staff with such needs as far as is reasonably practicable. It is recommended that, where necessary and where a degree of risk is presented, either by the act of taking the medication or missing of a necessary dose, that a risk assessment can be undertaken to put in place the necessary controls. The responsibility to raise this issue lies with the staff member in question who should alert Rochdale Training's Health and Safety Manager to such matters.

3. Learners with Medicinal Needs

Learners with medical or medicinal needs have the same rights of admission to Rochdale Training as other learners. Most learners will at some time have short term medical needs, for example the need to complete a course of medicine such as antibiotics.

Others may have longer term medical needs and may require medicines on a long-term basis to keep them well, for example learners with Type 1 diabetes, well controlled epilepsy or cystic fibrosis. Others may require medicines in particular circumstances, such as learners with severe allergies who may need an adrenaline injection. Learners with severe asthma may have a need for daily inhalers and additional doses during an attack.

4. Medicines Act 1968

The Medicines Act 1968 specifies the way that medicines are prescribed, supplied and administered within the UK and places restrictions on dealings with medicinal products, including their administration. Anyone may administer a prescribed medicine, with consent, to a third party, so long as it is in accordance with the prescriber's instructions. This indicates that a medicine may only be administered to the person for whom it has been prescribed, labelled and supplied. No one other than the prescriber may vary the dose and directions for administration. The administering of prescription only medicine by injection may be done by any person but must be in accordance with directions made available by a doctor, dentist, nurse prescriber or pharmacist prescriber in respect of a named patient.

5. Anaphylaxis

Anaphylaxis is an acute, severe allergic reaction requiring immediate medical attention. It usually occurs within seconds or minutes of exposure to a certain food or substance although on rare occasions may happen after a few hours.

The most severe form of allergic reaction is anaphylactic shock, when the blood pressure falls dramatically, and the patient loses consciousness. Other symptoms may be exhibited. It is vital that the person receives an antidote or medical assistance immediately. The treatment for a severe allergic reaction is normally an injection of adrenaline (also known as epinephrine).

Rochdale Training's First Aiders are trained in the administering of an individual's own EpiPen (re-loaded injection device) should the individual have one and be unable to self-administer. Rochdale Training does not hold stock of EpiPen's in the First Aid Room as this is not permissible. If the individual has no EpiPen, the paramedic will administer it on arrival – having already being called in the event of a severe allergic reaction. Safe disposal of the device is available in a registered Sharps waste disposal unit located in the First Aid Room.

6. Medicines and Control

As stated above first aiders have received training in the administering of adrenaline in the form of an "EpiPen". General medications should be kept safe and secure within bags for learners or desk drawers or bags for staff and should never be left on general view. Any medication that goes missing must be reported immediately to a Manager. Any person who it appears may have taken medication belonging to another person should be advised to seek medical attention immediately.

For those staff and learners who administer insulin using an injector pen, the safe keeping and disposal of the needle end is the responsibility of the insulin dependent person.

Most learners with medical needs can attend Rochdale Training or associated settings regularly and take part in normal activities, occasionally with support. However, staff may need to take extra care in supervising some activities to make sure that these learners, and others, are not put at risk.

7. Declaration

Staff and learners need to make Management aware of their needs which can be kept confidential if they require it. The Health Declaration completed by the learners at enrolment should provide sufficient details for an assessment to take place. It may be necessary to share such information with other lecturing/delivery staff and Rochdale Training first aiders via the Rochdale Training Health and Safety Manager. People at risk of heart disease and angina should have their medication about their person and should be instructed at induction to inform first aiders where it is kept.

8. Rochdale Training Staff Giving Medicines

It is rare that the person who requires medication cannot administer it themselves. Any member of staff who agrees to accept responsibility for administering prescribed medicines to a person **must have** appropriate training and guidance from a person specifically qualified in NHS standards and be insured by Rochdale Training before they do so. They should also be aware of possible side effects of the medicines and what to do if they occur. This must include training on anaphylactic shock. The type of training necessary will depend on the individual case.

Staff who have been approved must be registered as approved by Rochdale Training in writing and have a written letter of appointment and instruction for their duties. Rochdale Training should ensure that they have sufficient members of staff who are appropriately trained to manage medicines. In practice it is rare that learners take long-term medication and would require help to do so.

9. Staff Training

Staff should not give medicines without appropriate training from qualified health professionals. When staff agree to assist a learner with medicinal needs, Rochdale Training will provide any necessary training.

10. Administering Medication

There is no legal or contractual duty on staff to administer medicine or supervise a learner taking it. The only exceptions are set out in the paragraph below. Certain staff may have specific duties to provide medical assistance as part of their contract as in the case of support staff for high dependency learners. Swift action needs to be taken by a member of staff to assist any person in an emergency. Rochdale Training provides appropriate insurance providing policies and procedures are adhered to.

11. Staff 'Duty of Care'

Anyone caring for learners under the age of 18, and more stringently, under 16 years of age, such as tutors and support staff have a **common law duty of care to act in such a manner** that reflects a reasonably prudent parent. Staff need to make sure that learners are healthy and safe. In exceptional circumstances the duty of care could extend to administering medicine and/or taking action in an emergency, this duty also extends to staff leading activities

taking place off site, such as trips and visits. If there is time, they should call upon the trained and approved person to take action.

Disciplinary proceedings may be taken if the correct safe procedure for disposal of needle end is not followed.

Rochdale Training provides a yellow sharps box if needle ends are found (or if there is a problem with disposal), located in the First Aid Room.

12. Learner Medication Guidelines

- i. The learner is to administer their own medication in all cases unless unable to do so.
- ii. If under 18 years of age the parental consent form (attached to this document) must be completed and kept on the learner's file in case the learner is unable to administer their own medication.
- iii. Staff must receive training on how to administer such medication.
- iv. The disposal of needle ends must be done in a safe and prescribed manner.
- v. All medication must be kept securely and never be left on public view.
- vi. Staff are not to give any learner any medication that is not prescribed for that learner i.e. no headache tablets are to be given to any learner at any time.

**PARENTAL AGREEMENT FOR ROCHDALE TRAINING TO ADMINISTER
MEDICINE (for learners under 18)**

Course Title:	
Name of Learner:	
Date of Birth:	
Medical Condition or illness:	
Medicine:	
Name/type of medicine (as described on the container)	
Dosage and methods	
Timing, if relevant	
Special precautions, if relevant	
Any side effects Rochdale Training should know about?	
Self-Administration Yes <input type="checkbox"/> No <input type="checkbox"/> <i>(Please tick appropriate box)</i>	
Procedures to take in an Emergency	
Contact Details	
Name:	
Daytime Telephone Number:	
Relationship to learner:	
Address:	
Doctor's details (GP)	
<p>Please read and agree the following very carefully</p> <p>I agree that appropriate Rochdale Training staff may undertake any necessary action in order to:</p> <ul style="list-style-type: none"> ▪ Administer the prescribed medication and ensure this is done in good faith. I will not hold Rochdale Training accountable in any way for these said actions. ▪ I accept that this is a service that Rochdale Training is not obliged to undertake. <p>I understand that I must notify Rochdale Training of any changes in writing.</p>	
SIGNATURE:	DATE:

ADULTS SAFEGUARDING POLICY

1. Definition and legal requirements

An adult is any person who has reached their 18th birthday. 'Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.'

It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, whilst at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

An adult may be unable to protect themselves from harm or exploitation due to many reasons, including their mental or physical incapacity, sensory loss or physical or learning disabilities or complex needs. This could be an adult who is usually able to protect themselves from harm but maybe unable to do so because of an accident, age, disability, frailty, domestic abuse, financial difficulty, seeking asylum, addiction, or illness.

Rochdale Training staff will act with care to ensure that all adults are protected from harm, on the same terms as children. All concerns raised regarding an adults welfare will be dealt with on an individual basis, meaning the approach taken will be person led and outcome focussed.

The key laws and statutory guidance documents are:

- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Mental Capacity Act 2005
- Protection of Freedoms Act 2012

Rochdale adheres to following the six key principles which underpin The Care Act 2014:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

2. Safeguarding

Safeguarding Adults is a term which is broader than 'adult protection' and relates to the action taken to promote the welfare of adults and protect them from **harm**. Safeguarding is everyone's responsibility.

Safeguarding adults at risk.

Any person has committed an offence in law if they have:

Harmed an adult through their actions or inaction (relevant conduct). This means a person has done something which may lead to harm or has failed to take action to prevent harm.

Staff will receive training on recognising the signs and indicators of abuse, neglect and radicalisation. Staff will be actively vigilant and if they form a concern about the safety of a learner, report to the Safeguarding Officer without delay (see flowchart 1 – referral of concerns).

If you are aware of an adult at risk, being in danger of abuse or who is being abused, you must act by reporting this to a Safeguarding Officer immediately. You cannot tell an adult that everything will be kept quiet to protect them or person connected to them otherwise the abuse or risk of abuse may continue.

Abuse should be considered in a wider context than just physical and can take numerous forms.

- **Sexual abuse**
- **Physical abuse**
- **Psychological abuse**
- **Domestic abuse**
- **Discriminatory abuse**
- **Financial abuse**
- **Self-neglect**
- **Acts of omission**
- **Organisational**
- **Modern Slavery**

In line with Government Legislation Rochdale Training aims to reduce the risk of harm to vulnerable adults from abuse, exploitation, or radicalisation. Rochdale Training will not tolerate the abuse of adults in any of its forms and is committed to prevention, detection, and reporting where appropriate.

Staff working with adults with at risk must always act in their best interests and ensure they take all reasonable steps to prevent harm occurring. Having safeguards in place within an organisation not only protects and promotes the welfare of adults but also it enhances the confidence of staff, volunteers, parents/carers and the general public.

These safeguards should include procedures for dealing with issues or concerns of abuse and safeguarding officers who liaise with the Local Adult Safeguarding Board for Rochdale and the Multi-Agency Safeguarding Hub (MASH) for Greater Manchester.

Rochdale Training will ensure that safe and effective working practices are in place with robust referral pathways and reporting mechanisms both internally and externally.

Safeguarding Adults in General

Irrespective of the above constraints on regulated activity, adults shall not receive or come to harm or be placed at risk of harm by any act of neglect, failure to act, inadequate staff training or management or for another reason within our control.

This policy is a statement of intent that demonstrates a commitment to safeguard adults involved in vocational or classroom learning or coming into contact with Rochdale Training in any other capacity, from harm.

To understand the detailed procedures and other aspects behind this policy please refer to the **separate** document: **Rochdale Training – Adult Safeguarding Procedure.**

ADULTS SAFEGUARDING PROCEDURE

SECTION 1

Procedures

Adult protection procedures and systems

a. Safeguarding Officers are:

Rachel Yates and Josh Harper

b. Responsibilities overview

Designated Safeguarding Officer

- Will always be someone with authority in Rochdale Training such as a Manager or Team Leader or will report to the Safeguarding lead on the SLT.
- Will be a paid member of staff
- Will have a full Disclosure and Baring Service (DBS) check.
- Will have at least two references which are followed up.

A deputy has been appointed (in case of sickness or leave) who has been checked with the same rigour.

c. Detailed Responsibilities

The Designated Safeguarding Officers are the first point of contact for all staff and volunteers to go to for advice if they are concerned about an adult (this may also need to be out of hours so staff and volunteers should always know how to contact them)

Rachel Yates Tel: 01706 631417 Mob: 07860 919379 safeguarding@rochdaletraining.co.uk
ryates@rochdaletraining.co.uk

(DSL):

Josh Harper: Tel: 01706 631417 Mob: 07377 400379 safeguarding@rochdaletraining.co.uk
jharper@rochdaletraining.co.uk

Staff holding this formal appointment have a higher level of safeguarding training and knowledge than the rest of the staff and should have read the DoH policy on adult protection and be aware of the role of the Local Authority Adult Protection Team.

They are responsible for ensuring that the organisation's safeguarding policy is kept up to date.

They ensure that they comply with safe recruitment procedures for new staff members and their induction.

They assess information from staff regarding concerns about adults and make decisions about whether staff concerns are sufficient enough to notify the local Adult Protection Team at Social Work Services or whether other courses of action are more appropriate – for example – police involvement.

They make formal referrals to the local authority Duty and Advice Team:

They ensure that concerns are logged and stored securely.

They have joint responsibility with the Rochdale Training management committee to ensure that the organisation's safeguarding policy and related policies and procedures are followed and regularly updated;

They are responsible for promoting a safe environment for adults

They know the contact details of relevant statutory agencies

Please note: It is not the responsibility of the designated safeguarding officer to decide whether an adult has been abused or not - that is the responsibility of investigative statutory agencies

However, keeping all adults safe is everybody's role and all staff should know who to go to and how to report any concerns they may have about an adult being harmed or at risk of being harmed.

Further information below shows some of the risk areas you should be aware of.

Rochdale Training Designated Safeguarding Lead and Officer are registered with the Local Adult Safeguarding Board to ensure that they are kept up to date with all the latest safeguarding information in the local and national regions and details of events and training.

2. Concerns over Adult Abuse

The DoH gives the following advice which may help safe-guarders to recognise harm and abuse even though it does not meet the legal requirements for adult regulated activity.

Abuse in the home

An adult is more at risk of abuse at home if:

- They are isolated and don't have much contact with friends, family or neighbours i.e., during lockdowns.
- Have memory problems or have difficulty communicating
- Become dependent on someone as a carer
- Don't get on with their main carer.

- That carer is addicted to drugs or alcohol
- The carer relies on them for a home, or financial and emotional support.

Spotting signs of abuse: advice for staff

It's not always easy to spot the symptoms of abuse. Someone being abused may make excuses for the abuser, they may not want to talk or be ready to talk about the situation.

Therefore, it is important for staff to know the signs of abuse and, how to support adults who require it. If you wait, hoping the person will tell you what's been happening to them, you could delay matters and allow the abuse to continue.

Signs of abuse in an adult could include:

- Becoming quiet and withdrawn
- Being aggressive or angry for no obvious reason
- Looking unkempt, dirty or thinner than usual
- Sudden changes in their normal character, such as appearing helpless, depressed or tearful
- Physical signs of abuse, such as bruises, wounds, fractures and other untreated injuries
- The same injuries happening more than once
- Not wanting to be left on their own or alone with particular people, not wanting to go home.
- Being unusually light-hearted and insisting there's nothing wrong.
- Taking a sudden interest in religion/new groups.

Other signs to watch out for include a sudden change in their finances, not having as much money as usual to pay for shopping or regular outings or getting into debt.

Rochdale Training acknowledge that peer on peer abuse could take place within the centre. Bullying behaviours will not be tolerated, and sanctions will be applied to perpetrators.

If you feel a learner is showing signs of abuse or is at risk of abuse, report it to the Safeguarding Officer immediately.

If a learner makes a disclosure. It is up to the staff member that the disclosure is made to, to complete the Safeguarding incident form and pass it on to the safeguarding team immediately.

Don't ignore your concerns. That could allow any abuse to carry on or escalate.

I'm worried about a learner who may be experiencing abuse or neglect. What should I do?

Start by talking to the person in private if you feel able to do so. Mention some of the things that concern you – for instance, that they've become depressed and withdrawn, have been losing weight, or seem to be short of money.

Let them talk as much as they want to, but be mindful that if they've been abused, they may be reluctant to talk about it because they're afraid of making the situation worse, because they don't want to cause trouble or they might be experiencing coercion by someone or being threatened in some way.

Do not promise the person you won't tell anyone what you've heard. If an adult is being abused or neglected, it's important to find help for them and stop the harm. Stay calm while the person is talking, even if you're upset by what you hear, otherwise they may become more upset themselves and stop telling you what's been going on.

It can be very difficult for an abused or neglected person to talk about what's been happening to them.

If the adult has been abused or neglected, report it to the Safeguarding Officer without delay.

How to respond and Report

There are three types of reporting:

- a. The member of staff who notices abuse or harm or the risk of harm to an adult must tell a Safeguarding Officer. They must initially record their concerns or the disclosure on the safeguarding reporting form.
- b. The Safeguarding Officer must act immediately by reporting it to the local Adult Safeguarding Board or police.
- c. The Regulated Activity Provider (RAP) (Chief Executive) in liaison with the Safeguarding Officer must complete the Disclosure & Barring Service Documents if a staff member has caused harm, is likely to have caused harm, has resigned, retired or escaped – but only where an adult was within regulated activity at the time.

Please note:

Staff members accused of harm may not be guilty. They may have been deliberately or mistakenly accused. If they are sent home from work this is not a disciplinary action. It is merely an administrative procedure to allow for further investigation.

Keeping reports:

All reports and incidents must be stored securely until destruction is directed by police or the Disclosure & Barring Service. The GDPR storage requirements do not apply to the preservation or records of abuse or possible abuse, since the

Disclosure & Barring Service reporting forms require details of previous or ongoing concerns at the time of final reporting.

3. Information Sharing

The protection of the adult is the most important consideration. You cannot keep abuse or harm secret. During your staff training you will be shown how to obtain key information whilst ensuring the confidence of the person who may have been abused. All actions should be carefully thought through, empathetic to the plight of the adult and reassuring that help will be obtained. There is to be no draconian interrogation of an already alarmed adult.

Ask your Safeguarding Officer for advice.

4. Code of Behaviour

Rochdale Training has policies which set out the standards of behaviour at work and when representing Rochdale Training in public and to visitors or telephone enquirers.

As staff you must have read and signed to accept the following policies:

- Disciplinary and grievance procedures
- Whistleblowing
- Staff conduct (including misuse of social media)
- Health & safety at work
- Anti-radicalisation
- Equality & diversity
- Anti-harassment & bullying policy
- Safeguarding children
- Safeguarding adults
- Remote Learning Policy Statement and Protocols
- Online safety
- Sexual violence and harassment

5. Safe Recruitment and Selection

Rochdale Training requires and will ensure safe recruitment, selection and vetting procedures that include checks into the eligibility and the suitability of all staff and volunteers who have direct or indirect (e.g. helpline, email) contact with adults in regulated activity only.

The Rochdale Training Management team are to be fully familiar with all aspects of the Disclosure and Barring Service Regulations and procedures and current protection legislation. They are empowered to consult with external agencies in cases of doubt over technical or complicated issues.

6. Complaints

Rochdale Training has a fully available and well-promoted complaints procedure which encourages and enables any child or adult learner or staff member to complain about the treatment of adults.

7. Whistleblowing

Nothing in any staff contract prevents the truth from emerging. You all have full permission to report wrongdoing or harm without prejudice to your own employment or career potential.

8. Staff Supervision and Monitoring

Rochdale Training has systems to ensure that all staff and volunteers working with adults are monitored and supervised and that they have opportunities to learn about adult protection in accordance with their roles and responsibilities; safeguarding training is mandatory for all those who work directly with adults in regulated activity.

9. Staff Training

In addition to learning about all forms of harm to adults in regulated activity and our safeguarding procedures all Rochdale Training staff and volunteers will regularly learn at induction and at regular intervals about these further adult protection concerns in accordance with and as appropriate to, their roles and responsibilities:

- Online Safety,
- Domestic violence
- Forced marriage
- Female genital mutilation
- Race and racism
- Violent extremism
- Safeguarding adults from abuse
- Sexual violence and harassment

ALCOHOL & DRUGS POLICY (Learner)

Rochdale Training recognises that we have a responsibility to provide clear guidance to all Learners who enter our premises, on the issue of drugs and alcohol.

Rochdale Training has a duty of care under the Health and Safety at Work Act to safeguard the health and wellbeing of all learners and staff especially where the operation of machinery can cause injury to the individual or to others.

Therefore, Rochdale Training reserves the right, where serious grounds of concern exists that a learner or an apprentice is under the influence of drugs or alcohol, to suspend the individual and contact the employer & parents (subject to age). Certain employers may want to investigate further including enforcing their Company Policy to drug test/randomly test staff where applicable. Also, depending on the seriousness, we reserve the right to contact the Police.

We also reserve the right where reasonable grounds for suspicion exist to search Learners' Lockers. We can also search learners with their consent for any item

Such action will be based upon:

- Direct observation by staff or others via our Whistleblowing Policy.
- A learner showing physical symptoms of being under the influence or having a pattern of abnormal, erratic behaviour.

What do we mean by "Drugs"?

By drugs we are referring to any Class A, B or C controlled substance, as well as alcohol and solvents.

Class A Drugs include: Heroin, cocaine (including crack), methadone, ecstasy, LSD and magic mushrooms.

Class B Drugs include: amphetamines, barbiturates, codeine, cannabis and synthetic cannabinoids.

Class C Drugs include: benzodiazepines (tranquilisers), GHB/ GBL, tretamine, anabolic steroids and spice (BZP).

Where Learners are taking legally prescribed controlled drugs, we would ask them to make us aware immediately. **Please note that it is illegal to sell or pass these on.**

What if someone is suspected of possessing or selling drugs?

They will be reported to the Departmental Manager. Unauthorised use of drugs will be viewed as Gross Misconduct and will mean exclusion from our premises and may result in dismissal.

In instances where criminal activity is involved, we will inform the Police.

What if you are approached or witness anything?

You should inform a member of Rochdale Training Staff immediately. Please be aware that although information given to us will be treated in confidence, our priority will be to eliminate risk to others.

What if someone comes to training under the influence of drugs/alcohol?

If staff suspects someone is under the influence of drugs/alcohol on Rochdale Training premises, they will be sent home immediately and if appropriate, they will not be paid a training allowance for that day. Employers of employed status Learners will be informed. Our aim is always to ensure a safe training environment for all.

First and foremost, WE ARE HERE TO HELP.

If you feel you have an issue with regards to drugs or alcohol, you can **CONFIDENTIALLY** speak with one of our Safeguarding/Welfare Officers; Rachel Yates or Josh Harper.

Rachel Yates: LL: 01706 631417

Mob: 07860 919379

E: safeguarding@rochdaletraining.co.uk

Josh Harper:

LL: 01706 631417

Mob: 07377 400379

E: safeguarding@rochdaletraining.co.uk

There are also many local support organisations that we work with, which individuals can be referred to.

What if I need help or advice?

The following organisations are able to offer help:

- **National Drugs Helpline:** Tel: 0800 776 600
- **Lifeline:** Tel: 01254 677 493
- **Drugs Information Service:** Tel: 01254 680 520
- **Early Break:** Tel: Tel: 0161 723 3880
- **Rochdale Active Recovery (Roar):** Tel: 03005 550 234
- **Rochdale Borough Council:** Drug & Alcohol Outreach Team: Tel: 01706 924883

If you have any questions about this policy or want to talk over any concerns, your Tutor will be available to offer advice and support.

FOR YOUR OWN SAFETY

You cannot work in the Training Centre under the influence of drugs or alcohol.

If this occurs:

- Your Tutor will be informed.
- You will be sent home.
- Your employer will be informed.
- Your parents/carer will be informed if you are under the age of 18.
- Rochdale Training reserves the right to inform the Police.
- It may result in dismissal from the centre and therefore, discontinuation of your qualification.
- If you feel you need advice or support with drugs or alcohol, please speak to one of the Safeguarding Officers:

Rachel Yates – 07860 919 379

Josh Harper – 07377 400379



ALCOHOL & DRUGS POLICY **(staff)**

The use or possession of alcohol, illicit drugs or controlled substances is strictly **NOT** permitted on the premises.

You are also strictly **NOT** permitted to attend work under the influence of any of these substances. For the purpose of this Policy, "under the influence" means having consumed *any* of the above substances in *any* quantity.

Where it is believed that you may be under the influence or in possession of illicit drugs or controlled substances, the Company reserves the right to contact the Police.

The Company accepts that there are occasions when you may need to take prescription medication whilst attending work. Where possible side effects are listed such as drowsiness, dizziness, tiredness etc, it is essential that you notify your Manager or the Chief Executive so that any necessary measures can be taken to ensure your safety.

Any employee who is concerned that they may have a dependence on drugs or alcohol is encouraged to seek help from their GP. They should also notify their line manager so that appropriate workplace support can be considered to assist rehabilitation and aid recovery.

Breach of this Company Policy is classed as gross misconduct and may result in summary dismissal.

Anti-Cyber-Bullying Policy & Guidance for Staff

Policy Statement

Staff and learners are not to use our technology to bully, harass or discriminate against any person who works or visits the training centre or comes into contact with the staff or learner outside of it.

Do not misuse email, social media, mobile phone, internet or any other form of electro-magnetic communication.

Do not allow others to use your equipment. Do not post offensive items or images on the Internet or transmit them to any other person.

Do not connive, associate with or support persons who misuse technology in this way as a 'bystander'.

If you are found to have breached this policy in a minor way in the judgement of a Safeguarding Officer, you will be counselled.

There will be no second chances for serious offences or repetition following first-time counselling. Your communication equipment will be confiscated, and you will be reported to the police.

Any messages or images that have caused offence will be preserved and passed to the Courts.

As a staff member, please note that, if proven, this is a disciplinary offence amounting to a gross breach of discipline for which termination of employment is almost certainly to be the judgement of the Chief Executive.

As a learner, if Rochdale Training have *in loco parentis* responsibility for you, we will inform your parents or guardians no matter where they may live, in the UK or outside it.

Having a criminal record for harassment, bullying or discrimination may mean that you can no longer obtain certain jobs, since your Disclosure and Barring Service check may show the offence.

If you use technology to help or encourage the passing of drugs, or are found to have encouraged terrorism then it is almost certain that you will be arrested and barred for life from working in some 11 million jobs where children and vulnerable adults may be found.

Please think before misusing electronic-equipment. Do NOT ruin your life.

See Staff Guidance for more information or contact Safeguarding Officers:

Rachel Yates
Operations Manager:

Landline: 01706 631417 ext 159

Mobile: 07860 919379

Email: safeguarding@rochdaletraining.co.uk

Josh Harper
Engineering Mentor

Landline: 01706 631417 ext 155

Mobile: 07377 400379

Email: safeguarding@rochdaletraining.co.uk

Understanding Cyber-Bullying

1. Cyberbullying can be defined as the mis-use of Information and Communications Technology (ICT), particularly mobile phones, social media and the internet, deliberately to upset someone else. This may be by sending upsetting or bullying messages by text, email, social media or gaming sites, or sending saved or live images of an offensive, pornographic or politically dangerous nature.

The range of offences is vast and recent cases have included sending threatening messages to teachers and trainers, using a mobile phone camera on a stick to film a college staff member sitting on the toilet, tricking children, young people or adults in need into stripping off in front of mobile phone cameras and then posting their pictures on the Internet, Catfishing, downloading films of ISIS and encouraging adults in need and children to commit suicide.

Cyberbullying can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target. However, it differs in several significant ways from other kinds of bullying: the invasion of home and personal space; the difficulty in controlling electronically circulated messages; the size of the audience; perceived anonymity; and even the profile of the person doing the bullying and their target.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children can abuse each other online, this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of indecent images and pornography to those that do not wish to receive such content.

2. Research into the extent of cyberbullying indicates that it is a feature of many young people's lives. It also affects members of provider staff and other adults; there are examples of staff being ridiculed, threatened and otherwise abused online by learners.
3. Initial research has further shown that throughout the Covid-19 pandemic, cyberbullying increased by 70% amongst teenagers on social media and 40% on gaming platforms. This has remained a constant part of many children's lives.
4. Cyberbullying, like all bullying, should be taken very seriously. It is never acceptable, and a range of Education Acts and government guidance outline schools' duties and powers in relation to bullying. For example, the

Education and Inspections Act 2006 (EIA 2006) includes legal powers that relate more directly to cyberbullying; it outlines the power of head teachers to regulate the conduct of learners when they are off-site and provides a defence in relation to the confiscation of mobile phones and other items.

5. Although cyberbullying is not a specific criminal offence, there are criminal laws that can apply in terms of **harassment and threatening and menacing communications**. Rochdale Training Safeguarding Officers should contact the police if they feel that the law has been broken.
6. Cyberbullying takes different forms: threats and intimidation; harassment or “cyber-stalking” (e.g. repeatedly sending unwanted texts or instant messages); vilification / defamation; exclusion or peer rejection; impersonation; unauthorised publication of private information or images (including what are sometimes misleadingly referred to as ‘happy slapping’ (group violence images); and manipulation.
7. Some cyberbullying is clearly deliberate and aggressive, but it is important to recognise that some incidents of cyberbullying are known to be unintentional and the result of simply **not thinking about the consequences**. What may be sent as a joke may not be received as one, and indeed the distance that technology allows in communication means the sender may not see the impact of the message on the receiver. There is also less opportunity for either party to resolve any misunderstanding or to feel empathy. It is important that learners are made aware of the effects of their actions and the potential sanctions/consequences.
8. In cyberbullying, bystanders can easily become perpetrators – by passing on or showing to other images designed to humiliate, for example, or by taking part in online polls or discussion groups. They may not recognise themselves as participating in bullying, but their involvement compounds the misery for the person targeted. Our anti-bullying policy refers to these **‘bystanders’** who actively support cyberbullying and set out sanctions for this behaviour. It is important that learners are aware that their actions have severe and distressing consequences and that participating in such activity will not be tolerated.

Preventing cyberbullying

9. The Safeguarding Officers will lead on the prevention of cyberbullying. However, all staff have a role to play in reporting any incidents to the Safeguarding Officers immediately.
10. Essential elements of prevention are **awareness-raising** and **promoting understanding** about cyberbullying. Awareness can be raised and understanding promoted through **discussion and activity** around what cyberbullying is and how it differs from other forms of bullying. These activities will include staff and learners.
11. Our anti-bullying policies have been reviewed to include cyberbullying. We must ensure that learners and staff are all aware of the procedures and sanctions for dealing with cyberbullying.

12. We will be reviewing existing, Acceptable Use Policies (AUPs), referencing responsible use of IT networks and equipment, Virtual Learning Environments (VLEs) and mobile phones. It is also important that we review how our network is monitored and check whether existing procedures are adequate. A Mobile and Smart Technology Policy has been developed.
13. We will record and monitor incidents of cyberbullying in the same way as all other forms of bullying and use this information to develop our policies and practices.
14. Publicising reporting routes is an important element of prevention, raising awareness of the issue but also ensuring that any incidents can be stopped before they become too serious or upsetting. We must ensure that learners and staff are all aware of the different ways available to report cyberbullying incidents. In addition, we can signpost information about external reporting routes, providing information about contacting service providers directly.
15. Education and discussion around the responsible use of technologies and e-safety are key to preventing cyberbullying and helping children, young people or adults in need deal confidently with any problems that might arise, whether in or out of training. Technology can have a positive role in learning and training practice, and there is a need for staff to be confident about ICT in order to model the responsible and positive use of technologies and to respond to incidents of cyberbullying appropriately.
16. Stay up to date – prevention and responding strategies require continuous review and refinement as new technologies and services become popular. This guidance, similarly, will be updated periodically as technologies develop.

Responding to cyberbullying

17. Cyberbullying is a form of bullying, and as such we are already equipped to deal with the majority of cyberbullying cases through our existing anti-bullying and behaviour policies and procedures. However, we should recognise the ways in which cyberbullying differs from other forms of bullying and reflect that in how we respond to it. In addition to considerations about the invasiveness of cyberbullying, the size of the audience, and other such factors, cyberbullying yields evidence in a way that other forms of bullying do not.
18. The person being bullied will usually have examples of texts or emails received and should be **encouraged to keep these** to aid in any investigation. There are also additional reporting routes available, through mobile phone companies, internet service providers and social networking sites: so
 - retain evidence,
 - contain incidents, and
 - contacting the relevant organisations to report offences or misuse of technology

19. Some forms of cyberbullying involve the distribution of content or links to content, which can exacerbate, extend and prolong the bullying. There are advantages in trying to contain the spread of these, and options here include contacting the service provider, confiscating phones, and contacting the police (in relation to illegal content). Learners who attend Rochdale Training will not have access to the wi-fi network. Monitoring and Filtering applies to all devices both on and off Rochdale Trainings Network.
20. Advise those experiencing cyberbullying on steps they can take to avoid recurrence – for example, advise those targeted not to retaliate or reply; provide advice on **'blocking' or removing people from 'friends lists'**; and ask them to **think carefully** about what private information they may have in the public domain.
21. Take steps to identify the person responsible for the bullying. Steps can include looking at the provider's IT system and computer logs; identifying and interviewing possible witnesses; and, with police involvement, obtaining user information from the service provider.
22. Once the person responsible for the cyberbullying has been identified, it is important that, as in other cases of bullying, **sanctions** are applied. Steps should be taken to change the attitude and behaviour of the bully, as well as ensuring access to any help that they may need. We will have existing sanctions in place for bullying behaviour, and these should apply equally to cyberbullying. In addition, it is important to refer to the Use of IT Policy and apply sanctions where applicable and practical. Technology-specific sanctions for learners engaged in cyberbullying behaviour could include limiting internet access for a period of time or removing the right to use a mobile phone on the training site, for example.

Anti-Harassment & Bullying Policy

POLICY

Rochdale Training recognises that all employees and learners have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. Rochdale Training are committed to eliminating intimidation.

The policy applies to all types of harassment including on the grounds of disability, marriage and civil partnership, pregnancy and maternity, gender (sex), age, sexual orientation, nationality or national origin, skin colour, perceived race or racial group, ethnic origin and religion/belief, or under criminal law, or bullying and/or discrimination amounting to harassment.

Harassment breaches the company equality and diversity policy and is classified as a serious offence, which may result in dismissal from the company. Some types of harassment and bullying are criminal offences necessitating police action. The policy applies to all staff, learners, subcontractors and associates.

DEFINITION

In law harassment is described as 'unwanted conduct which affects the dignity of men and women at work; it includes unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory'. The characteristic of harassment is that action(s) is/are unwanted by the recipient. The following examples of harassment may assist in determining whether harassment has taken place:

SEXUAL HARASSMENT

Sexual harassment can happen to males or females. It includes behaviour of a sexual nature, which is unwelcome to the receiver. It is unreciprocated and unwanted verbal or physical approaches, sexually explicit and derogatory statements which are found objectionable and offensive and make the employee/learner towards whom they are addressed, feel threatened or humiliated.

Sexual harassment can involve intimidation, which could create a hostile or offensive working or learning environment; interfere with an individual's training; prevent an individual's full enjoyment of education opportunities or induce conformity, stress, anxiety, fear or sickness on the part of the harassed person.

Sexual harassment could include:

- Unnecessary and unwelcome physical contact, touching or patting
- Suggestive and unwelcome comments or gestures emphasising the sexuality of an individual or of a group
- Unwelcome or derogatory remarks regarding the sexual orientation or preference of an individual or of a group
- Unwelcome requests for social sexual encounters and favours

- Display of pornographic pictures and internet downloading of offensive material at work or when training
- Criminal acts such as indecent exposure or sexual assault

RACIAL HARASSMENT

Racial harassment includes racial abuse, and racial derogatory statements that are found objectionable and offensive and make the employee/learner towards whom they are addressed, feel threatened or humiliated. Offensive jokes of a racial manner in communication that is not used with other employees/learners are likely to constitute racial harassment.

This includes:

- Ridicule of an individual for cultural differences.
- Exclusion from normal study activities or social events
- Unfair allocation of work or responsibilities
- Racist graffiti or insignia
- Verbal abuse including the use of specific words deemed to be criminally racist or threats
- Physical attack

Although differences of attitude or culture and the misinterpretation of social signs can mean that what is perceived as racial harassment by one person may not seem so to another. The defining features, however, are that the behaviour is offensive or intimidating to the recipient and would be regarded as racial harassment by any reasonable person.

CHILD ON CHILD ABUSE

Child on child abuse is any form of physical, sexual, emotional, financial and/or coercive control exercised between children and young people; this includes intimate and non-intimate relationships.

Like any form of abuse, child on child abuse will not be tolerated and will not be passed off as "banter", "just having a laugh" or "just part of growing up".

Rochdale Training aims to minimise the risk of child on child abuse by promoting respect amongst staff and peers and challenging inappropriate behaviour.

Any child is capable of abusing their peers and such instances will be dealt with following the Harassment and Bullying Policy.

OTHER FORMS OF HARASSMENT

There are other forms of harassment that equally can cause misery for those who suffer them including harassment via mobile phones and electronic communication. Such harassment may occur in any teaching/working environment used by employee/learners. It may be:

- Bullying, intimidation, threats, abuse or venting your anger on others

- Insults or ridicule about a person’s work, attitudes, character or personal life
- Derogatory remarks concerning personal or physical characteristics or appearance
- Persistent teasing
- Constant unfounded criticism of the performance or work tasks
- Offensive and continued use of inappropriate terminology

CYBERBULLYING AND MISUSE OF THE INTERNET, INFORMATION TECHNOLOGY, COMMUNICATIONS OR ELECTRONIC DEVICES

Staff and learners are to note that cyberbullying by learners, staff members or between learners is a reportable disciplinary offence. It is our policy not to allow any misuse of the internet or Technology devices. See our separate policy on Cyberbullying.

RESPONSIBILITY

Any employee/learner who suffers harassment will have the support of Rochdale Training in putting a stop to it. Anyone who experiences or witnesses an incident of harassment should not wait until the situation reaches an intolerable level. Action taken early is proven to be most effective.

You are strongly advised to take action as early as possible because memories of incidents may fade. A lapse of time may mean that it is unreasonable for a complaint to be pursued. It is in everyone’s interests for a complaint to be dealt with as quickly as possible.

If a learner makes a disclosure of harassment or bullying to a staff member, the staff member is responsible for reporting the incident immediately to the Safeguarding Officers. Rochdale Training will follow the same procedure to investigate and deal with instances of harassment and bullying that have taken place outside of the centre.

WHAT YOU SHOULD DO AS THE VICTIM OF HARASSMENT

There are various ways in which an individual can deal with harassment, ranging from simply asking the person to stop, to taking up a formal complaint.

Step one

Act promptly – don’t wait until the situation reaches an intolerable level or your personal wellbeing is put in jeopardy. In some cases, the person against whom you have a complaint may be unaware that his/her words or actions have been misinterpreted. In such cases the misunderstanding needs to be cleared up speedily. Even where the behaviour was intentional, a swift and clear indication that the behaviour is objectionable may well prove to be sufficient.

Although an objection is often most effective when delivered face-to-face, there may be good reasons why you choose not to speak directly to the person against whom you have a complaint. If this is the case, you have the following options:

- Asking a fellow employee/learner or a member of staff to go with you to speak to the person, or to go in your place.
- You might write to the person against whom you have a complaint, being specific about what offends you. You should keep a copy of the letter in case further action is necessary.
- Taking the matter up with a member of staff in whom you have confidence.
- You should write down details of any subsequent incidents.

Step two

If the behaviour persists, or if further action is seen as necessary, learners should get in touch with their Instructor or Tutor, employees with your line manager who will listen to you in confidence, advise you how to proceed and explain how the complaint can be taken up more formally.

Step three

Serious or persistent cases of harassment will need to be considered as potential disciplinary matters and must therefore be raised with a senior manager. If a formal complaint is made, the senior manager will prepare a written report on the basis of interviews conducted with the complainant and the harasser, in accordance with approved disciplinary procedures. In certain circumstances the police may be involved.

IF YOU WITNESS HARASSMENT

You may feel that the person experiencing harassment is unable to take the appropriate actions in Steps 1-3 you may give support as necessary and/or take action as explained in Step 1.

If you want to take action beyond Step 1, you should seek permission from the person experiencing harassment. If this is not forthcoming, you may report the incident as in Step 2, but you must protect the identity of the person who experienced the harassment. Action beyond Step 2 requires that person's permission.

If the harassment is of a more general nature (such as public disparagement of a group), you may take Step 1 or Step 2 as appropriate.

All complaints will be handled with the utmost confidentiality.

WHAT ROCHDALE TRAINING WILL DO IN RESPONSE TO A COMPLAINT

Informal action

Any member of staff who is approached informally by a complainant is expected to:

- Act speedily by listening and reporting the allegation to one of the Safeguarding Officers
- Respond sensitively to the complaint
- Provide advice, including information about the procedure if a formal complaint becomes necessary

Take up the matter informally with the person against whom the complaint has been made and involve their Instructor or Tutor, or Line Manager if requested to do so. In this event, the complainant should be asked for permission to give their name and a copy of the complaint, if in writing, to the person against whom the complaint has been made. Anonymous complaints can be pursued only in general terms and are less likely to bring about the desired change in behaviour. The person against who the complaint has been made will be advised of the nature of the complaint, be given a copy of any statement of the complaint and be given the opportunity to respond. Any written responses will be made available to the complainant.

Both the complainant and the person against whom the complaint has been made should also be advised of the procedure to be followed if a formal complaint were to be made.

FORMAL COMPLAINTS

Any formal complaint shall be brought to the attention of a senior manager who must arrange for the complainant to be interviewed within five working days. In the case of sexual harassment, a member of senior staff of the same sex as the complainant, to minimise any feeling of embarrassment, will if possible, conduct the interview. If there are religious sensitivities, especially with regards to women within the matter under investigation, then these will be taken into account. A fellow employee/learner or member of staff in whom they have confidence may accompany complainants. If the interviewer's report indicates that the matter should be pursued the senior manager may exercise powers according to the disciplinary procedure.

These procedures are designed so that Rochdale Training can fulfil its obligations:

- To the complainant – to take the matter seriously, to investigate the allegation thoroughly and if it is proved, to take swift and effective action to prevent a recurrence.
- To the person against whom the complaint is made – to investigate impartially, to make sure that the person has the opportunity to be represented, and to give a clear account of the allegation so that a case can be started and witnesses can be called or interviewed.

SUBSEQUENT ACTION

The disciplinary procedures allow a senior manager to exclude employees/learners from the Centre for good cause, and serious cases of harassment would be such a cause. In other cases, warnings about future conduct would be appropriate. If a formal complaint is lodged and written records are made, Rochdale Training will need to take these matters into account in considering:

- Whether to recommend that an employee or learner should be excluded from future attendance at Rochdale Training.

- Whether the appointment of a member of staff should be continued; or whether further disciplinary action should be taken.
- Whether and at what stage disciplinary proceedings should be initiated against a member of staff.
- Whether support measures for both the victim and perpetrator are required.
- Nothing in this will prevent the employees/learners from exercising their legal rights.

RECORDS

Record of informal action

Where a complaint is found not to have substance, no formal record will be kept unless the individual against whom the complaint has been made asks for a record to be made.

Where it is accepted by the person against whom the complaint has been made that there is substance, a record will be kept within their employee/learner file for 12 months, including correspondence relating to the informal complaint and the outcome. At the end of this period, provided no further accusations of harassment have been made and found to have substance, the record will be removed and may not be referred to again.

Where, after investigation it is not possible to decide whether there is any substance to the complaint; either party may request an appeal to the Chief Executive or the Chairperson in their absence.

Record of formal action

A record of formal action will be held in accordance with the appropriate disciplinary procedures. If disciplinary action is taken because the harassment was against a person under 18 or a vulnerable adult and the type of harassment falls under the Safeguarding Vulnerable Groups Act 2006, then the harasser may be in breach of safeguarding law. If disciplinary action is taken, a formal report about the harasser will be passed to the Disclosure and Barring Service.

COMMUNICATION

Staff will be made aware of the harassment policy and the procedure. They will be re-assured regarding:

- Fear that no action will be taken against a person guilty of harassment
- Fear that the complaint will not be taken seriously
- Fear of retaliation or victimisation in registering a complaint either informally or formally through the grievance procedure.

This policy will be included in the staff induction programme.

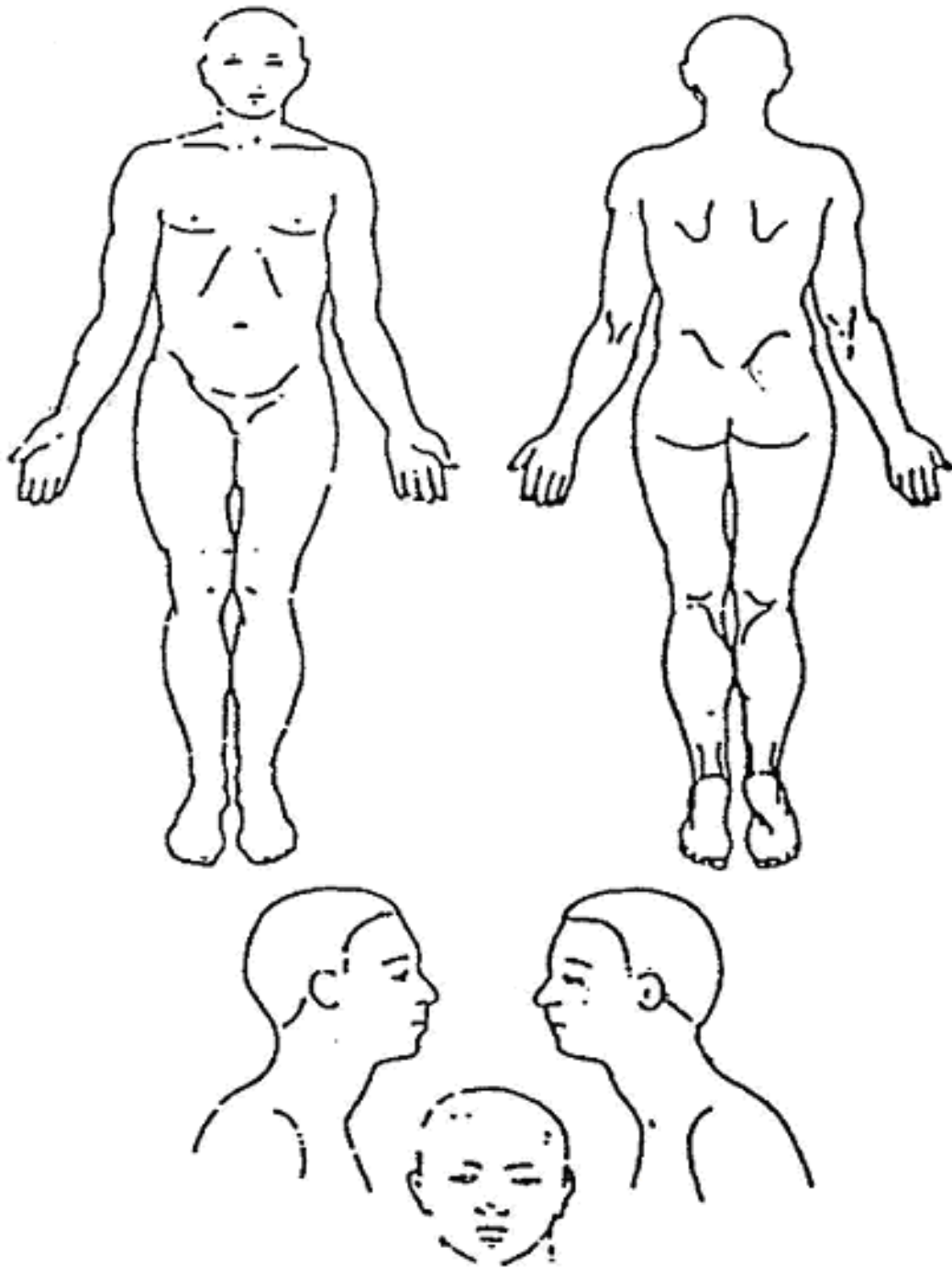
TRAINING

Training will be provided for those employees who may be involved with dealing with complaints and implementing the policy and procedure.

MONITORING AND REVIEW

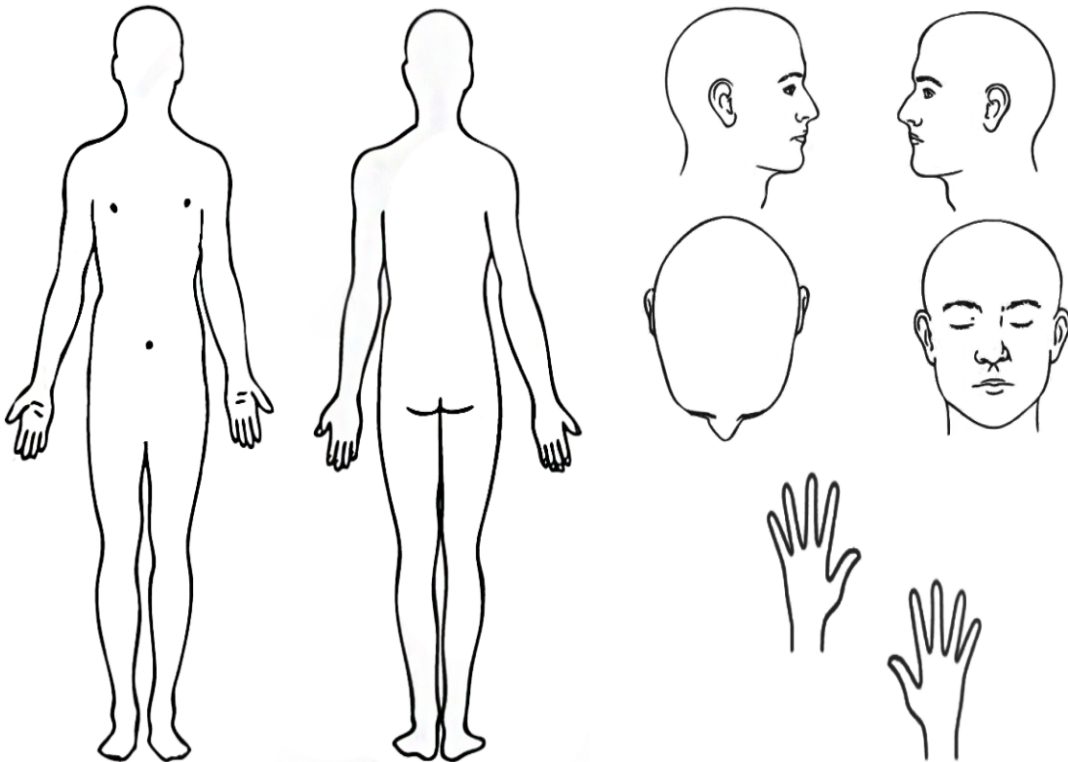
Strict confidentiality will be maintained complying with Data Protection and GDPR on all monitoring activities in respect of the complaints of harassment. Senior Management will evaluate the effectiveness of the procedure and ensure the continuous improvement of all procedures and processes.

BODY MAP & Incident Recording Sheet



INCIDENT RECORDING SHEET

Child, young person or vulnerable adults name	
Date of birth:	
Name of member of staff who witnessed the injuries (if any)	
Date and time injuries seen:	
Date and time info recorded:	
Details of injuries and location on body: (Where they are, what they look like, there colour, shape, size and condition. Is the injury healing or worsening?)	
How was the injury sustained according to the child, young person, vulnerable adult and/or parent or carer?	



Name of member of staff recording incident:	
Current date and time:	
Name of learner:	
Organisation:	
Who was present at the disclosure?	
Names of any other staff informed:	
Names of any other learners involved:	
Are parents/carers aware? (Give details)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Nature of concerns:	
Account of full incident:	
Action taken:	
Date and time reported to SG Officer:	
SG Officer Action Taken:	
Name of any other agencies involved:	
Updates:	
Signed:	
Date:	

BOMB THREAT PROCEDURE

PROCEDURE FOR BOMB THREATS

1. INTRODUCTION

The purpose of this safety specification is to ensure that any employee likely to receive a bomb threat over the telephone can respond to the situation in a structured and calm manner. This will assist in obtaining maximum information from the caller therefore minimising the subsequent risk of injury to all persons on site.

The safety specification also deals with the actions to be taken by the Manager who is contacted by the person who receives the call, after the call has been completed.

2. RESPONSIBILITIES

2.1 The person receiving the telephone call is responsible for attempting to obtain the maximum amount of information from the caller by following procedures detailed in Section 3.

2.3 The Manager (see 3.1.2), who is contacted by the person who receives the call, is responsible for ensuring that the building is evacuated, that the police are informed and the Health & Safety Manager is contacted. The Health & Safety Manager is also responsible for ensuring that the Chief Executive Officer of the Company is informed of the threat at the earliest possible time and that instructions are passed to the Fire Wardens to evacuate the site.

3. PROCEDURES

Reception staff are most likely to handle the initial telephone call, so should be made aware of this procedure, a copy should be to hand or easily accessible on their PC.

3.1 In the event of an employee receiving a bomb threat over the telephone, they must take the following actions:

3.1.1 Refer to the instruction sheet (see Appendix A).

3.1.2 Immediately upon completion of the telephone call contact one of the following personnel:

Health and Safety Manager
or
Chief Executive Officer
or
The most senior person on site

and inform them of the call giving as much detail (ref. Appendix A) as it has been possible to gain.

3.1.3 At some point later, after the building has been evacuated, Appendix B should be completed as far as practically possible.

- 3.2 The Manager who is contacted must take the following actions:
- 3.2.1 Activate the Fire Alarm to evacuate the building.
 - 3.2.2 Contact the Police and give them any details available.
 - 3.2.3 Contact the CEO or any other Senior Manager who may be on site. If there are no Senior Managers on site, steps should be taken to contact at least one of them at home.
 - 3.2.4 Contact the Fire Brigade to inform them that there is a bomb threat, the Police have been contacted and the building has been evacuated.
 - 3.2.5 After first assembling at the Fire Assembly Point, Fire Wardens and their groups should gather on the PAVEMENT at least 100 metres away from the building (and away from any windows as broken glass is a major hazard) until permission to return has been given by the Police.

APPENDIX A

**ACTION TO BE TAKEN ON RECEIPT
OF A BOMB THREAT**

STAY CALM AT ALL TIMES

Immediately alert someone else if possible (so that the Health and Safety Manager may be contacted), **BUT DO NOT PUT DOWN THE HANDSET OR CUT OFF CONVERSATION**

1. Obtain as much information as you can.
2. Try to keep the caller talking
(apologise for the bad line, ask him to speak up etc).
3. Complete this form as you go along asking questions in sequence as necessary.

EXACT TIME OF CALL _____

MESSAGE (EXACT WORDS)

Where is it? _____

When will it go off? _____

What does it look like? _____

What kind of bomb is it (type of explosive)? _____

Why are you doing this? _____

**HAND THIS FORM IN TO THE MANAGER DEALING WITH
THE SITUATION.**

DO NOT LEAVE IT IN THE BUILDING

ADDITIONAL QUESTIONS IF OPPORTUNITY PRESENTS

The following additional questions should be asked if the caller seems willing to continue talking.

1. Time of detonation (when bomb will go off) _____

2. Location of bomb _____

Method of detonation:

Remote Control	<input type="checkbox"/>
Timer	<input type="checkbox"/>
Booby Trap	<input type="checkbox"/>
Other	<input type="checkbox"/>

4. Type of bomb:

Gelignite	<input type="checkbox"/>	TNT	<input type="checkbox"/>
Dynamite	<input type="checkbox"/>	Mine tec	<input type="checkbox"/>
Military device	<input type="checkbox"/>	Other	<input type="checkbox"/>

5. Container:

Paper bag	<input type="checkbox"/>	Package	<input type="checkbox"/>
Box	<input type="checkbox"/>	Can	<input type="checkbox"/>
Bottle	<input type="checkbox"/>	Carton	<input type="checkbox"/>
Briefcase	<input type="checkbox"/>	Pipe	<input type="checkbox"/>
Other	<input type="checkbox"/>		

6. Delivery: (how it was planted)

In person	<input type="checkbox"/>	Posted	<input type="checkbox"/>
Message service	<input type="checkbox"/>	Other	<input type="checkbox"/>

7. Any other useful information _____

BOMB THREAT CHECK LIST

Name of person receiving call _____

Date _____

Time _____

1. DETAILS OF CALLER

Male

Female

Adult

Child

2. VOICE CHARACTERISTICS

Tone

Loud
Soft
High pitched
Low pitched
Raspy
Nasal
Laughing
Impatient

Manner

Calm
Angry
Emotional
Rational
Irrational
Deliberate

Speech

Fast
Slow
Coherent
Incoherent
Distinct
Muffled

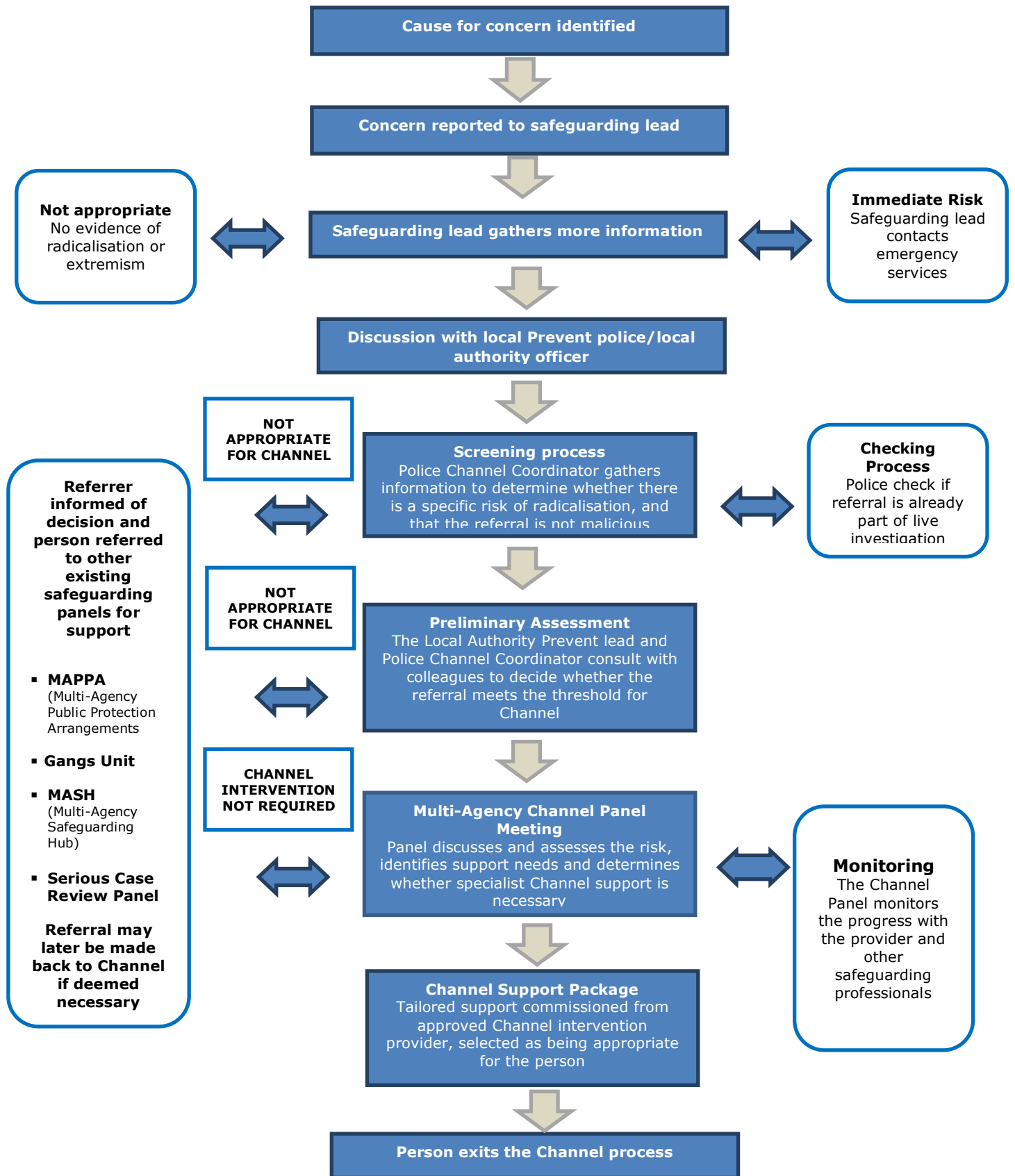
Language

Excellent
Good
Fair
Poor
Cursing

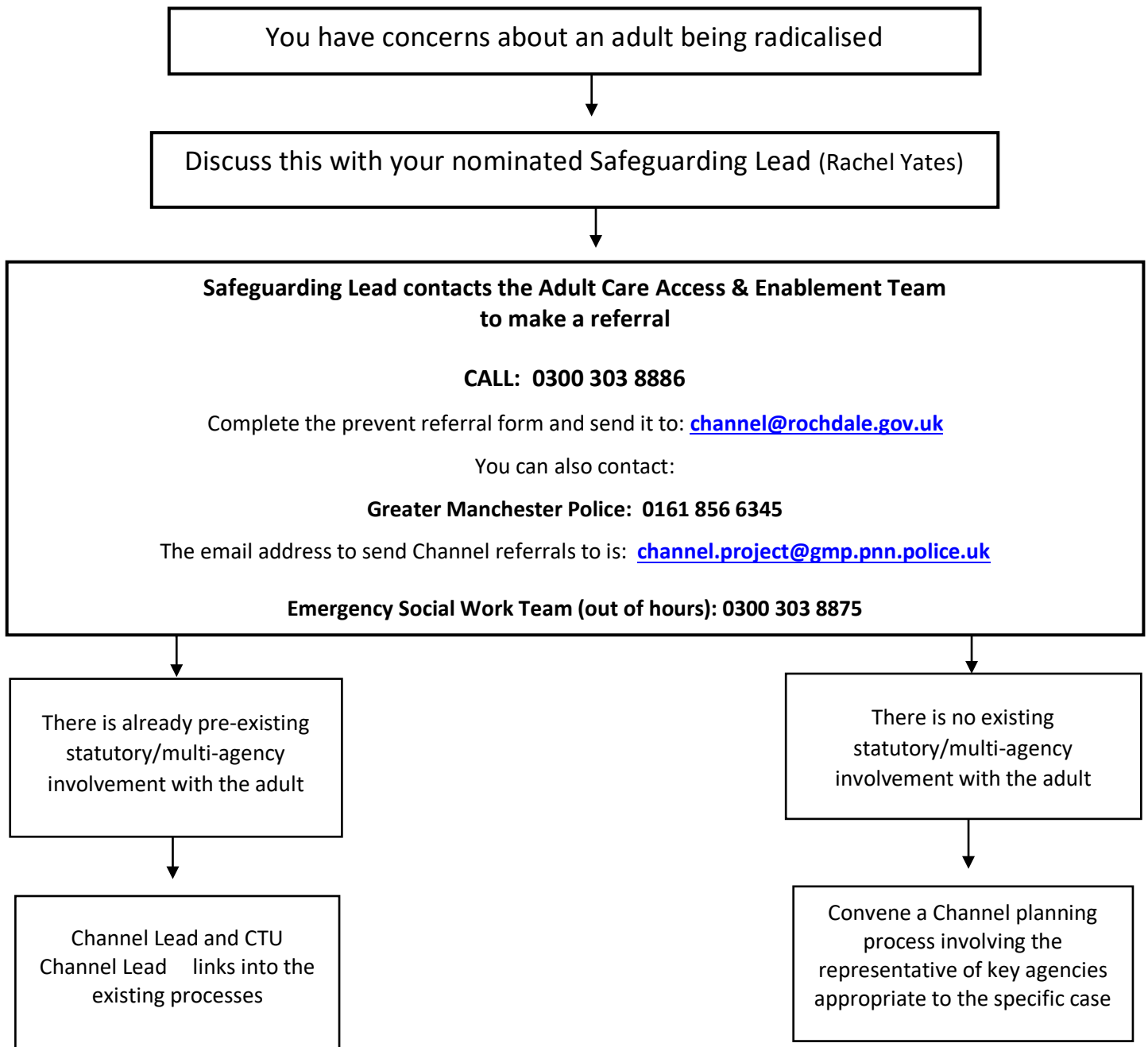
Accent

English
Other
please specify:

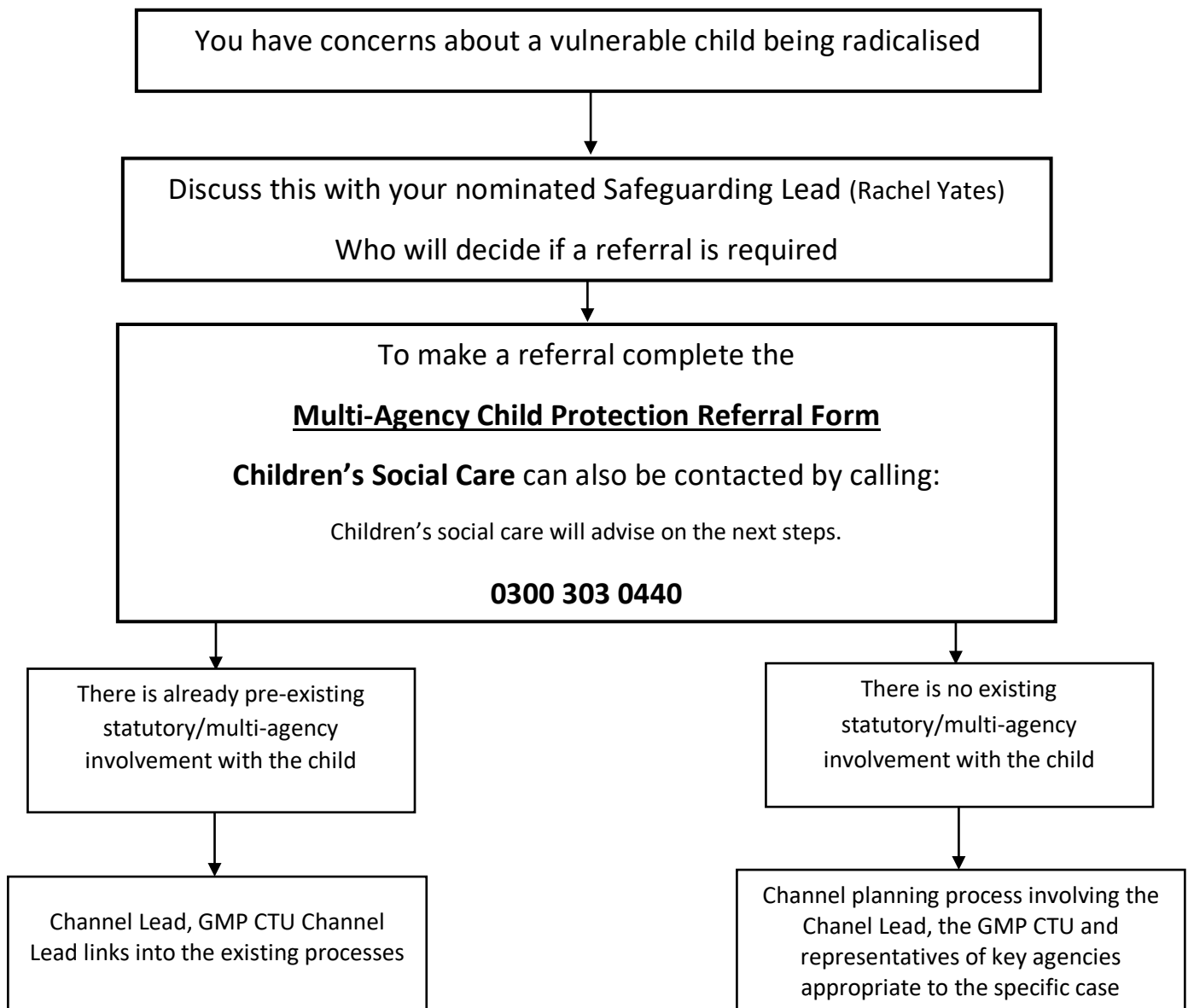
CHANNEL PANEL PROCESS



CHANNEL PANEL REFERRAL PATHWAY FOR ADULTS



CHANNEL PANEL REFERRAL PATHWAY FOR CHILDREN



CHILDREN'S SAFEGUARDING POLICY

1. Definition and legal requirements

A child in law is any person who has not reached their 18th birthday.

Children and young people under 18 years of age are an especially vulnerable group and therefore the law requires they must be specially protected from harm. Rochdale Training staff are therefore to act with common sense and care to ensure that children are protected from harm.

The key laws and statutory guidance documents are:

- Children's Act 1989
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Working together to Safeguard Children 2018 (updated 2020)
- Keeping Children Safe in Education 2023
- The Children's act 2004
- Children & Social Work Act 2017

All organisations including vocational training companies are expected to comply with the government inter-agency statutory guidance **Working together to Safeguard Children 2018 (updated 2020)**, 'unless exceptional circumstances arise'.

The law requires that professionals and organisations protecting children need to reflect on the quality of their services and learn from their own practice and that of others. Good practice should be shared so that there is a growing understanding of what works well. Conversely, when things go wrong there needs to be a rigorous, objective analysis of what happened and why, so that important lessons can be learnt, and services improved to reduce the risk of future harm to children.

2. Safeguarding

Safeguarding is a term which is broader than 'child protection' and relates to the action taken to promote the welfare of children and protect them from **harm**. Safeguarding is everyone's responsibility. Safeguarding is defined in **Working together to Safeguard children 2018 (Updated 2020)**:

- Protecting children from maltreatment
- Preventing impairment of children's health and 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

Harm is explained here:

Any person has committed an offence in law if they have:

Harmed a child or an adult in need, through their actions or inaction (relevant conduct). This means a person has done something which may lead to harm or has failed to take action to prevent harm.

Staff will receive training on recognising the signs and indicators of abuse, neglect and radicalisation. Staff will be actively vigilant for these signs and indicators and if they form a concern about the safety of a learner, report to the Safeguarding Officer without delay. (See flowchart 1 referral of concerns)

If you are aware of a child being in danger of harm, or who is being harmed you must act by reporting this to a Safeguarding Officer immediately. You cannot tell a child that everything will be kept quiet to protect them or person connected to them otherwise the harm or risk of harm may continue.

Harm should be considered in a wider context than just physical and can take numerous forms.

Types of harm relating to children can include (but are not limited to):

- **Emotional / Psychological** - Action or inaction by others that causes mental anguish.
- **Physical** - Any intentional physical contact that results in discomfort, pain or injury.
- **Sexual** - Any form of sexual activity with a child under the age of consent.
- **Neglect** - Failure to identify and/or meet care needs.
- **Child on Child abuse (see separate child on child abuse policy)**

Domestic Abuse:

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.

Any reports of domestic abuse must be reported to a safeguarding officer immediately (see separate Domestic Abuse Policy).

Staff working with vulnerable groups, including children, must always **act in their best interests** and ensure they take all reasonable steps to prevent harm to them. Having safeguards in place within an organisation not only protects and

promotes the welfare of children but also it enhances the confidence of staff, volunteers, parents/carers and the general public.

These safeguards should include a child protection policy and procedures for dealing with issues of concern or abuse and a safeguarding team headed by a senior safeguarding officer who liaises with the Rochdale Borough Safeguarding Children Partnership and the Multi-Agency Safeguarding Hub (MASH) for Greater Manchester.

Rochdale Training operates a “whole organisation approach to Safeguarding; safeguarding is everyone’s responsibility.

3. Striving to Protect Children

Children shall not receive or come to harm or be placed at risk of harm by any act of neglect, failure to act, inadequate staff training or management or for any other reason within our control.

This policy is a statement of intent that demonstrates a commitment to safeguard children coming into contact with Rochdale Training, from harm. Key factors are:

- The welfare of the child is paramount – you must do your very best to protect them
- No child or group of children must be treated any less favorably than others in being able to access our services which meet their particular needs
- All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs
- This policy is reviewed, approved and endorsed by Rochdale Training Chief Executive annually or when legislation changes
- The policy applies to all staff and volunteers and relevant connected persons including those with sub-contracts or service level agreements
- Children and parents are to be informed of the policy and procedures as appropriate and a list of parent or guardian (in loco parentis) addresses and contact details will be kept.
- All concerns, and allegations of abuse will be taken seriously by the safeguarding team and all managers, staff and volunteers and responded to appropriately - this may require a referral to children’s social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees and other volunteers, and in emergencies, the police (see safeguarding contact information and safeguarding LADO information)

We are committed to safe recruitment, selection and vetting

- We will abide by the principles, legislation and guidance that underpin the policy
- We will continuously review the policy and its procedures and forms
- All staff will comply with the associated policies and procedures which promote children's safety and welfare e.g. with regards to health and safety and anti-bullying

This Policy is amplified by a separate document entitled:

Rochdale Training – Child Safeguarding Procedure and should be read in conjunction with:

- Online Safety Policy
- Sexual Violence and Harassment
- Child on Child Abuse
- Staff Conduct Policy
- As well as the supporting documents named throughout the policy

CHILDREN'S SAFEGUARDING PROCEDURE

Guidance for Safeguarding Officers and Staff

As detailed in the Rochdale Training Child Safeguarding Policy, the types of harm relating to children can include (but are not limited to):

- **Emotional / Psychological** - Action or inaction by others that causes mental anguish.
- **Physical** - Any intentional physical contact that results in discomfort, pain or injury.
- **Sexual** - Any form of sexual activity with a child under the age of consent.
- **Neglect** - Failure to identify and/or meet care needs.

Safeguarding Officers and staff are to note that:

Child abuse is categorised in the following ways:

- **Emotional Abuse**
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
- **Physical Abuse**
Any non-accidental injury to a child and can include hitting, biting, burning, throwing and shaking or otherwise causing physical harm to a child.
- **Sexual Abuse**
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
- **Neglect**
The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

The Protection of Freedoms Act 2012

This Act of Parliament amended and enhanced the Safeguarding Vulnerable Groups Act 2006 and established the DBS (Disclosure and Barring Service) which processes criminal records checks and manages the Barred Children's and Barred Adults' Lists of unsuitable people who must not work in regulated activities with these groups.

The DBS decides who is unsuitable to work or volunteer with vulnerable groups and it is illegal for a barred person to apply for such work (paid or voluntary), or for a charity to employ a barred person in such work. It is also a legal requirement for employers to refer someone to the DBS if they:

- Dismissed them because they harmed a child or adult in need

- Dismissed them because they might have harmed a child or adult in need otherwise
- We're planning to dismiss them for either of these reasons, but the person resigned first

1. Child protection procedures and systems

A. Safeguarding Officers:

The Safeguarding Officers are: Rachel Yates and Josh Harper.

B. Responsibilities overview

Designated Safeguarding Officer

- Will always be someone with authority in Rochdale Training such as a Manager or Team Leader
- Will be a paid member of staff
- Will have a full Disclosure and Baring Service (DBS) check.
- Will have at least two references which are followed up.

A deputy has been appointed (in case of sickness or leave) who has been checked with the same rigour.

C. Detailed Responsibilities

The Designated Safeguarding Officers are the first point of contact for all staff and volunteers to go to for advice if they are concerned about a child (this may also need to be out of hours so staff and volunteers should always know how to contact them):

Rachel Yates	Tel: 01706 631417	Mob: 07860 919379	safeguarding@rochdaletraining.co.uk ryates@rochdaletraining.co.uk
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(DSL):

Josh Harper:	Tel: 01706 631417	Mob: 07377 400379	safeguarding@rochdaletraining.co.uk jharper@rochdaletraining.co.uk
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Our staff holding these formal appointments have a higher level of safeguarding training and knowledge than the rest of the staff and will have completed regular training (at least yearly).

They are responsible for ensuring that their organisation's safeguarding policy is kept up to date.

They ensure that they comply with safe recruitment procedures.

They assess information from staff regarding concerns about children and make decisions about whether staff concerns are sufficient enough to notify Children's Social Work Services or whether other courses of action are more appropriate.

They make formal referrals to the local authority Duty and Advice Team;

They ensure that concerns are logged and stored securely.

They have joint responsibility with the Rochdale Training management committee to ensure that the organisation's safeguarding policy and related policies and procedures are followed and regularly updated;

They are responsible for promoting a safe environment for children and young people;

They know the contact details of relevant statutory agencies e.g. Children's Social Work Services (CSWS), Police, Rochdale Borough Safeguarding Children's Partnership (RBSCP) and the Local Authority Designated Officer (LADO) for allegations against staff.

Please note: It is not the responsibility of the designated Safeguarding Officer to decide whether a child has been abused or not - that is the responsibility of investigative statutory agencies such as Children's Social Work Services or the police.

However, keeping children safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child being harmed or at risk of being harmed.

Rochdale Training's Designated Safeguarding Officers are to register with the RBSCP to ensure that they are kept up to date with all the latest safeguarding information from the Board and details of events and training.

2. Child Sexual Exploitation

In Rochdale and many other towns and cities, the prevalent offence within child abuse is Child Sexual Exploitation. All staff are to be aware of the following:

When referring to Child Sexual exploitation the RBSCP has adopted the definition developed by the National Working Group:

"Someone taking advantage of you sexually, for their own benefit. Through threats, bribes, violence, humiliation, or by telling you that they love you, they will have the power to get you to do sexual things for their own, or other people's benefit or enjoyment (including: touching or kissing private parts, sex, taking sexual photos)"

Child sexual exploitation (CSE) relates to children under 18 years old and is child abuse. It can occur face to face or online. Online Child Sexual Exploitation is often thought of as adults abusing children. However, research indicates that more and more child exploitation material is being shared via social media and is being produced by children themselves. Child sexual exploitation not only relates to adults abusing those under 18, children and young people can be exploited by their peers.

CSE involves the child being deceived/ manipulated or forced into taking part in sexual activity either in person or via the use of technology. It could occur in what may be a seemingly consensual relationship or in return for attention, affection, money, drugs, alcohol or somewhere to stay. The child may not be aware, recognise or acknowledge that they are in an exploitative or abusive situation.

a. Who does it affect?

CSE can affect all children and young people from any background. It happens to boys and young men as well as girls and young women. However, some groups of children are particularly vulnerable such as, disabled children, children looked after, care leavers, migrant children, unaccompanied asylum-seeking children, homeless children and those missing from home and care.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

b. What do we all need to do?

Child sexual exploitation affects thousands of children and young people across the UK every year. As professionals working with children and young people, we all have an important role to play in working together to safeguard children from Child Sexual Exploitation to ensure that every child and young person in Rochdale is protected from being at risk of or experiencing sexual exploitation.

We can do this by:

- **Identification** - We should all be aware of the risk indicators relating to the vulnerability of CSE to enable us to identify whether a child is at risk of sexual exploitation.
- **Acting** - We should act upon early indicators relating to children and young people in order to protect them and prevent them from further harm. If someone identifies that a child may be at risk of CSE, they should contact a Rochdale Training Safeguarding Officer at work or if outside of work then the Local Authority Children Services Duty and Advice Team to discuss this. If a child is believed to be at immediate risk of harm, ring the Police on 999.
- **Vulnerability and Risk Management** - where it has been recognised that a child is at risk, has been targeted or is being exploited, services should work together to manage vulnerability and risk. This is usually coordinated by Children's

Social Work Service and involves multi-agency partnership working.

- **Disruption** - Services should work in partnership to disrupt perpetrator activity. This will include early identification and the sharing of information about individuals or groups who are believed to be exploiting children, between the police and services working with children and adults, the business sector and the wider community.

Staff are to note these risk indicators and factors to consider identifying Child Sexual Exploitation

(The list is not exhaustive, and the indicators are simply those mostly commonly recognised to indicate a risk of sexual exploitation.)

- **Education** - Regular non-attendance, excluded, change in attitude, behavioural or management problems, missing from education.
- **Missing / run away** - Comes in late, stays out overnight without permission, persistently reported as missing, whereabouts often unknown, missing for short periods of time on a regular basis, from education, home or care.
- **Sexualised risk taking** - Inappropriate dress/change in physical appearance.
- **Meeting:** unknown adults / getting into unknown cars. Internet used to meet adults. Older partner, associating with other children /young people/adults known to be involved with sexual exploitation
- **Rewards** - Unaccounted for money, or items such as new mobile phone, jewellery, and /or money spent or to spend that the child is unable to provide explanation for.
- **Contact** - with risky adults / environments - Associating with other known sexually exploited children and / or unknown adults. Extensive / secretive use of mobile phone / internet. Accessing unknown premises (homes) or known risky areas. Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- **Coercion / control** - Reported limited /reduced contact with friends, family or in placement, disclosure of physical /sexual assault (later withdrawn), physical injuries, whereabouts unknown/estranged from family
- **Sexual health** - Reported STI(s), miscarriage(s), termination(s) physical symptoms suggestive of sexual assault, pregnancy
- **Substance use** - Level of drug and alcohol use different / increased/concerning/chronic

- **Emotional Health** - Low self-esteem, self-harm, eating disorder, attempted suicide, violent behaviour, angry outbursts, risk taking behaviours, offending.
- **Online Safety** – refer to online safety policy.
- **Serious Violence** – Child criminal exploitation often includes serious violence. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include: increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are, involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- **Child on Child Abuse** – refer to peer on peer abuse policy.

3. How to respond and Report

All safeguarding concerns and disclosures must be reported without delay.

There are three types of reporting:

- d. The first staff member who notices abuse or harm or the risk of harm to a child must tell a Safeguarding Officer. If a learner makes a disclosure. It is up to the staff member that the disclosure is made to, to complete the Safeguarding incident form and pass it on to the safeguarding team immediately.
- e. The Safeguarding Officer must act in an immediate emergency by reporting to police – Otherwise, the MARF (Multi-Agency-Reporting-Form) must be completed and submitted to children’s services.
- f. The Regulated Activity Provider (RAP) (Chief Executive) in liaison with the Senior Safeguarding Officer must complete the Disclosure & Barring Service Documents if a staff member has caused harm, is likely to have caused harm, has resigned, retired or escaped.

Please note:

Staff members accused of harm may not be guilty. They may have been deliberately or mistakenly accused. If they are sent home from work this is not a disciplinary action. It is merely an administrative procedure to allow for further investigation.

All reports and incidents must be stored securely until destruction is directed by police or the Disclosure & Barring Service. The GDPR storage requirements do

not apply to the preservation or records of abuse or possible abuse, since the Disclosure & Barring Service reporting forms require details of previous or ongoing concerns at the time of final reporting.

4. Main Contact Agencies

Local Authority Children's Services: Tel: 0300 303 0440

Police: Tel: 0161 872 5050

Local Authority Designated Officer (LADO): Tel:0300 303 0350

NSPCC helpline: Tel:0808 800 5000

Child Exploitation Online Protection Centre (CEOP)

for Online Safety concerns: web address: www.ceop.police.uk

5. Information Sharing

The protection of the child is the most important consideration. You cannot keep abuse or harm secret. During your staff training you will be shown how to obtain key information whilst ensuring the confidence of the person who may have been abused. All actions should be carefully thought through, empathetic to the plight of the child and reassuring that help will be obtained. There is to be no draconian interrogation of an already alarmed child.

Ask your Safeguarding Officers for advice.

6. Code of behaviour

Rochdale Training has policies which set out the standards of behaviour at work and when representing Rochdale Training in public and to visitors or telephone enquirers.

As staff you must have read the following policies:

- Disciplinary and grievance procedures
- Whistleblowing
- Staff conduct (including misuse of social media)
- Health & safety at work
- Anti-radicalisation
- Equality & diversity
- Anti-harassment & bullying policy
- Safeguarding children
- Safeguarding adults

- Remote Learning Policy Statement and Protocols
- Online Safety (including filtering and monitoring).
- Sexual Violence and Harassment
- Child on child Abuse

7. Safe Recruitment and Selection

Rochdale Training requires and will ensure safer recruitment, selection and vetting procedures that include checks into the eligibility and the suitability of all staff and volunteers who have direct or indirect (e.g. helpline, email) contact with children.

The Rochdale Training Management Team are to be fully familiar with all aspects of the Disclosure and Barring Service Regulations and procedures and current protection legislation.

They are empowered to consult with external agencies in cases of doubt over technical or complicated issues.

In addition to DBS checks, all staff and volunteer recruitment will include interview questions about safeguarding and checking suitability to work with children with previous employers.

8. Complaints

Rochdale Training has a fully available and well-promoted complaints procedure which encourages and enable any child or adult learner or staff member to complain about the treatment of children.

9. Whistleblowing

Nothing in any staff contract prevents the truth from emerging. You all have full permission to report wrongdoing or harm without prejudice to your own employment or career potential.

10. Staff Supervision and Monitoring

Rochdale Training has systems to ensure that all staff and volunteers working with children are monitored and supervised and that they have opportunities to learn about child protection in accordance with their roles and responsibilities; safeguarding training is mandatory for all those who work directly with children, young people, their families and/or carers.

11. Staff Training

In addition to learning about all forms of harm to children, our safeguarding procedures and child sexual exploitation, all Rochdale Training staff and volunteers will regularly learn at induction about these further child protection concerns in accordance with and as appropriate to, their roles and responsibilities:

- Online Safety- including filtering and monitoring,
- domestic violence,
- forced marriage,

- female genital mutilation,
- children who live away from home or go missing,
- child sexual exploitation,
- race and racism
- violent extremism
- bullying
- involvement with serious crime
- radicalisation
- hate crime
- drug abuse
- children with family members in prison
- honour based violence
- homelessness
- private fostering
- gang and county line activities
- upskirting
- child on child abuse
- sexual violence and harassment
- domestic abuse and violence

CODE OF BEHAVIOUR

Practices to be avoided:

- Staff **should not** spend excessive amounts of time alone with children, young people or adults in need away from others. Meetings with individual children, young people or adults in need should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff should be aware of the meeting.
- Staff should not conduct 1-to-1 online teaching/training sessions unless they are recorded. Permission slips are also required for learners under the age of 18.
- Staff are **advised not to** make unnecessary physical contact with children, young people or adults in need. However, there may be occasions when physical contact is unavoidable, e.g. providing comfort at times of distress. In all such cases contact should only take place with the consent of the children, young people or adults in need.
- It is **not good practice** to take children, young people or adults in need alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians).
- Staff **should not** meet children, young people or adults in need outside of the work environment.
- Staff **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should record the facts and report these to the Safeguarding Officer.
- Staff should **never** (even in fun):
 - Initiate or engage in sexually provocative conversations or activity
 - Allow the use of inappropriate language to go unchallenged
 - Do things of a personal nature for children, young people or adults in need that they can do themselves.
 - Allow any allegations made by a children, young people or adults in need go without being reported and addressed.
 - Trivialise or exaggerate children, young people or adults in need abuse issues
 - Make promises to keep any disclosure confidential from relevant authorities.
- Staff **should not** show favouritism to any one children, young person or adult in need, nor should they issue or threaten any form of physical punishment.

Practices to be encouraged:

- Staff **must respect** children, young people or adults in need rights to privacy and encourage children, young people or adults in need to feel comfortable enough to report attitudes or behaviour they do not like.
- Staff **will be expected** to act with discretion with regards to their personal relationships. They should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff and children, young people or adults in need **must** be declared
- All staff **should be aware** of the procedures for reporting concerns or incidents and should familiarise themselves with the contact details of the Safeguarding Officers.
- If a member of staff finds himself or herself the subject of inappropriate affection or attention from a child, young people or adult in need, **they should** make others aware of this.
- If a member of staff has any concerns relating to the welfare of a child, young person or adult in need, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the child, young person or adult in need particularly where the child, young person or adult in need makes an allegation, they should report this to a Safeguarding Officer. (Read in conjunction with low level concerns policy)

Safeguarding Children, Young People or Adults in Need – a quick guide for staff

It is important that children, young people or adults in need are protected from abuse, neglect or significant harm. It is the responsibility of all Rochdale Training's employees to safeguard and promote the welfare of children, young people or adults in need participating on programmes. Employees should report any allegations or concerns regarding the welfare of these groups using the following guidelines.

What is abuse and when is a person at risk

For children and young people this includes:

- **physical** abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm
- **emotional** abuse which is the persistent emotional maltreatment so as to cause severe and persistent adverse effects on their emotional development
- **sexual** abuse which involves forcing or enticing a child, young person or adult in need to take part in sexual activities, including prostitution, whether or not the child, young person or adult in need is aware of what is happening.

- **neglect** consisting of the persistent failure to meet a child, young person or adult in need basic physical and/or psychological needs, which is likely to result in the serious impairment of their health or development
- Other forms of abuse include child on child abuse, bullying and cyberbullying, CSE and CCE.

For adults in need abuse can mean:

- **physical** abuse including hitting, slapping, punching, kicking, misuse of medication, restraint or inappropriate sanctions.
- **sexual** abuse including rape, sexual assault, or sexual acts to which the victim has not consented, could not consent to or was pressurised into consenting to.
- **psychological** abuse including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, verbal abuse, isolation, or withdrawal of services or supportive networks.
- **discriminatory** abuse including racist, sexist, religious abuse or abuse that is based on a person's disability.
- **financial** abuse including fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.
- **Self-neglect** including ignoring physical or medical care needs, failure to provide access to appropriate services or withholding of necessities of life.
- Other forms of abuse include Acts of omission, organisational, domestic abuse, bullying/cyberbullying and modern slavery.

What to do if

A child, young person or adult in need discloses abuse to you

Take the disclosure seriously and never dismiss the allegation of abuse. Provide a quiet and supportive environment to help the person feel at ease. Remember that an allegation of abuse or neglect may lead to a criminal investigation and asking leading questions or attempting to investigate the allegations yourself may cause problems for any subsequent court proceedings. Make notes declaring exactly what has been disclosed and complete a body map if required - complete the safeguarding referral form.

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with the Safeguarding Officer. The Safeguarding Officer will, where possible, respect the wishes of the individual; however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

Report the disclosure to the Safeguarding Officer immediately. Complete the Report Form and forward to the Safeguarding Officer within 24 hours. The Safeguarding Officer will identify the appropriate next steps and keep in contact with you to ensure that our Duty of Care is fulfilled (see flow chart)

What to do if.....

You are concerned a child, young person or adult in need may be at risk

- Contact the Safeguarding Officer for advice and guidance
- Make and keep a record of your concerns and forward to the Safeguarding Officer within 24 hours
- Discuss your concerns with the child, young person or adult in need if appropriate (see flow chart)

What to do if.....

A child, young person or adult in need accuses you or another member of staff of abuse

- Contact your Manager and the Safeguarding Officer for advice and guidance.
- Make and keep a record of the accusation and actions taken and forward to the Safeguarding officer within 24 hours (see flowchart)

CONTACT INFORMATION

Rochdale Training Safeguarding Officers

Rachel Yates (Lead):

Mob: 07860 919379

Confidential Email: safeguarding@rochdaletraining.co.uk

Josh Harper:

Mob: 07860 919389

Confidential Email: safeguarding@rochdaletraining.co.uk

ORGANISATION and Address	ACCESS TIMES	CONTACT DETAILS
Childline 1 Sickle Street Manchester M2 1DL	24-hour	Tel: 0800 1111 www.childline.org.uk
Children's Social Care Floor 4 Number One Riverside Rochdale OL16 1XU	Weekdays 08:30am-4:45pm	Office Hours - Tel: 0300 303 0440 Out of Hours – Tel: 0300 303 8875 ehash@rochdale.gov.uk
Adult Care Services Floor 4 Number One Riverside Rochdale OL16 1XU	Weekdays 08:30 – 16:45 Out of Hours	Tel: 0300 303 8886 Tel: 0300 303 8875 Adult.care@rochdale.gov.uk
Greater Manchester Multiple Safeguarding Hub		www.gmsafeguardingchildren.co.uk
The specialist Police Public Protection & Investigation Unit Rochdale Division can also be contacted, weekdays 08:30 to 17:00 on (NOT IN AN EMERGENCY)		
Rochdale Police Station The Esplanade Rochdale OL16 1AG	8am – 8pm	Tel: 0161 856 8530 www.gmp.police.uk
Police Emergency	Immediate Safety	Tel: 999
Police non-emergency	To report crime and other concerns that do not require an emergency response	Tel: 101
GMP Central Switchboard	Say you have a child protection concern and where the child lives	Tel: 0161 872 5050

DBS REVIEW FORM

Name:

Disclosure Number:

Date of Issue:

Based on recent Government guidelines on safeguarding and vetting for teaching and training institutions.

1. The Nature of the Offence

Conviction/Information: *(interviewer to complete as detailed on the Disclosure form with further information from interviewee as required).*

Disclaimer from Vetted person: *(interviewer to ask for explanation of offence detailed on Disclosure form from interviewee and complete in this section).*

2. The Nature of the Appointment *(Details of the job role and main responsibilities)*

Role: _____ responsible for:

-
-
-
-
-
-

3. The Age of the Offence *(Interviewer to complete details of date and age of the offence)*

The date of the conviction was ___/___/_____ ___ years ago

4. The frequency of the Offence *(interviewer to discuss frequency of the offence with the interviewee obtaining details as required).*

Isolated conviction/Repeat Offence

5. Outcome of the Review *(Decision made following the review in line with the CRB policy and procedure)*

Date of Review:	___/___/_____	Interviewer:	
Interviewer Signature:		Date:	___/___/_____
Interviewee Signature:		Date:	___/___/_____

Domestic Abuse Policy

Scope

The impact of domestic abuse is wide-ranging and will inevitably affect employees. Abuse can take many forms which includes psychological, financial, emotional, sexual and physical. It also includes controlling or coercive behaviour as well as stalking, forced marriage, so called honour crimes and female genital mutilation, as well as online or digital abuse.

The effects of domestic abuse can be far-reaching. Home and work issues cannot always be separated. Domestic abuse can affect job performance. It is important to remember that victims/survivors of domestic violence may be at increased risk of harm in their workplace if they leave an abusive partner, as it may be the only place they can be located.

Principles and Commitment

Every employee who is experiencing or has experienced domestic abuse has the right to raise the issue with Rochdale Training in the knowledge that we will treat the matter effectively and confidentially. This policy also covers the approach we will take where there are concerns that an employee may be the perpetrator of domestic abuse.

We are committed to developing a workplace culture that recognises that some employees may be experiencing domestic abuse and that the workplace should be a place of safety and one that recognises that perpetrators of domestic abuse are responsible for their behaviour and for addressing this.

Definition of Domestic Abuse

The Domestic Abuse Act 2021 states Domestic violence and abuse is best described as the use of physical and/or emotional abuse/violence including undermining of self confidence, sexual violence or the threat of violence, by any person, who is or has been in a close relationship with the victims/survivors, including abuse of parents or adult children.

The Government Definition

“Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.”

Domestic abuse and other forms of violence normally take place against women and are perpetrated by males. However, Rochdale Training recognises that controlling and abusive behaviour can also occur in same sex relationships and can be perpetrated by women against men.

Rochdale Training Recognises That:

- Domestic abuse occurs in all social classes, cultures and age groups whatever the sexual orientation, gender identity, mental or physical ability.
- Once it has started, it often becomes more frequent and more violent.
- It can severely affect children emotionally and physically.
- Victims/survivors are sometimes harassed by members of their immediate/extended family.
- Domestic abuse is gendered – the majority of perpetrators are men and between 80-90% of those who experience it are women.

- Domestic abuse is not a “one off” occurrence but it is frequent and persistent.

Identification of Domestic Abuse at Work

Whilst it is for individual themselves to recognise that they are a victim/survivor of domestic abuse, there are signs which may indicate an employee may be a victim/survivor. These may include the following:

- The member of staff may confide in their colleagues/manager.
- An employee may directly report the abuse of another colleague.
- There may be obvious effects of physical abuse.
- It may come to light after a drop in performance/change in mood.
- Poor attendance or the employee may prefer to be at work rather than home.

It is essential to understand that any of the above may arise from a range of circumstances – not just domestic abuse. It is important to respect the employees’ right to privacy. Whilst we encourage victims/survivors of domestic abuse to disclose domestic abuse for the safety of themselves, we will not force them to share this information if they do not want to.

Disclosure of Abuse

Staff experiencing domestic abuse may choose to disclose, report or seek advice from a manager. Managers will not counsel victims/survivors, but offer information, workplace support and signpost to relevant organisations.

Members of the Safeguarding Team have been trained in domestic abuse and will act as an additional confidential contact for staff.

All employees are encouraged to report any suspicions they have that a colleague is suffering from domestic abuse to the Safeguarding Lead.

Although Rochdale Training will respect the individual’s right to privacy, there are however some circumstances in which confidentiality cannot be assured i.e. concerns about children or vulnerable adults. In circumstances where Rochdale Training needs to breach confidentiality, we will seek specialist advice before doing so. Information will be shared on a need to know basis.

Rochdale Training will prioritise the safety of employees if they make it known that they are experiencing domestic abuse. As an organisation, we will need to consider incidents such as violent partners or ex-partners visiting the workplace, abusive phone calls, intimidation or harassment of an employee by the alleged perpetrator. Rochdale Training will encourage any employee who discloses domestic abuse to contact a specialist support agency. The agency will be able to help to create a safety plan/complete a risk assessment and advise what actions can be taken to increase their personal safety.

Perpetrators of Domestic Abuse

Rochdale Training recognises that they have a role to play in encouraging and supporting employees to address violent and abusive behaviour of all levels .

If an employee approaches Rochdale Training about their abusive behaviour, Rochdale Training will provide information about the services and support available to them and will encourage the perpetrator to seek support and help from an appropriate source.

Rochdale Training will treat any allegation, disclosure or conviction of a domestic abuse related offence on a case by case basis with the aim of reducing risk and supporting change.

An individual cautioned or convicted of a criminal offence may be subject to Rochdale Training's Code of Conduct Policy/Procedure. Rochdale Training also reserves the right to consider the use of this policy should an employee's activities outside of work have an impact on their ability to perform the role for which they are employed and/or be considered to bring the organisation into disrepute. Rochdale Training views the use of violence and abusive behaviour by an employee, wherever this occurs, as a breach of the organisation's Code of Conduct for disciplinary purposes.

The Role of Managers

- Be alert to spotting possible signs of domestic abuse and have a supportive conversation if you are concerned.
- Provide initial help and support, including signposting to appropriate sources of professional help.
- Protect confidentiality as far as possible.

Advice and Support

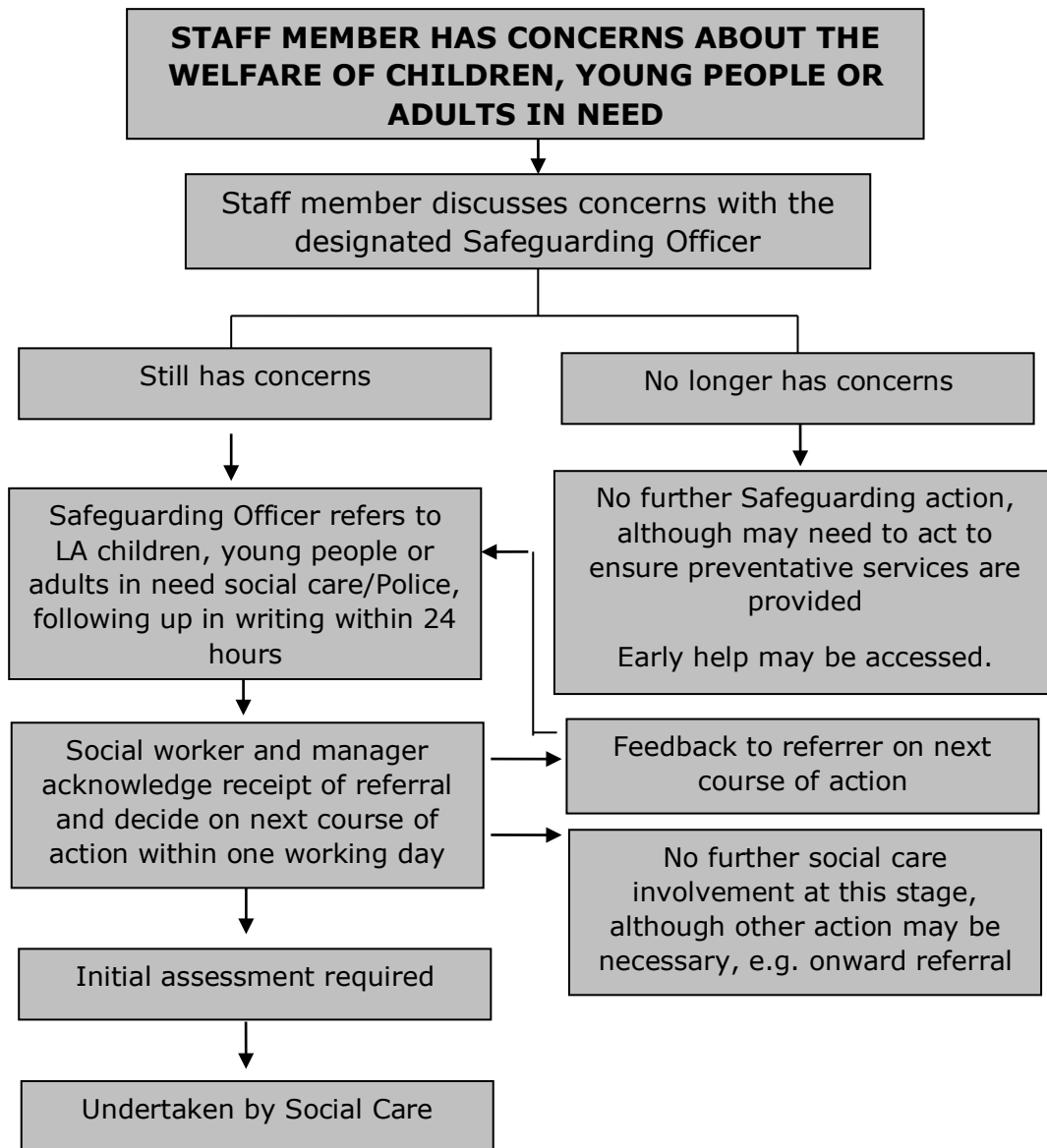
If you are concerned for your own or someone else's immediate safety, ring the police on 999.

You can also contact:

- National Domestic Violence Helpline – free phone 24 hours – 0808 2000 247
- Respect Phone Line – 0808 802 4040
- Rochdale Victim Support – 0161 507 9609
- Safenet – 0300 303 3581
- End The Fear – 0161 636 7525
- Greater Manchester Domestic Abuse Helpline – 0800 254 0909

Flow Chart 1 - Referral of Concerns

What to do if there are concerns about a child, young person or adult in need



See Rochdale Training's Policy and Procedures for safeguarding children, young people or adults in need.

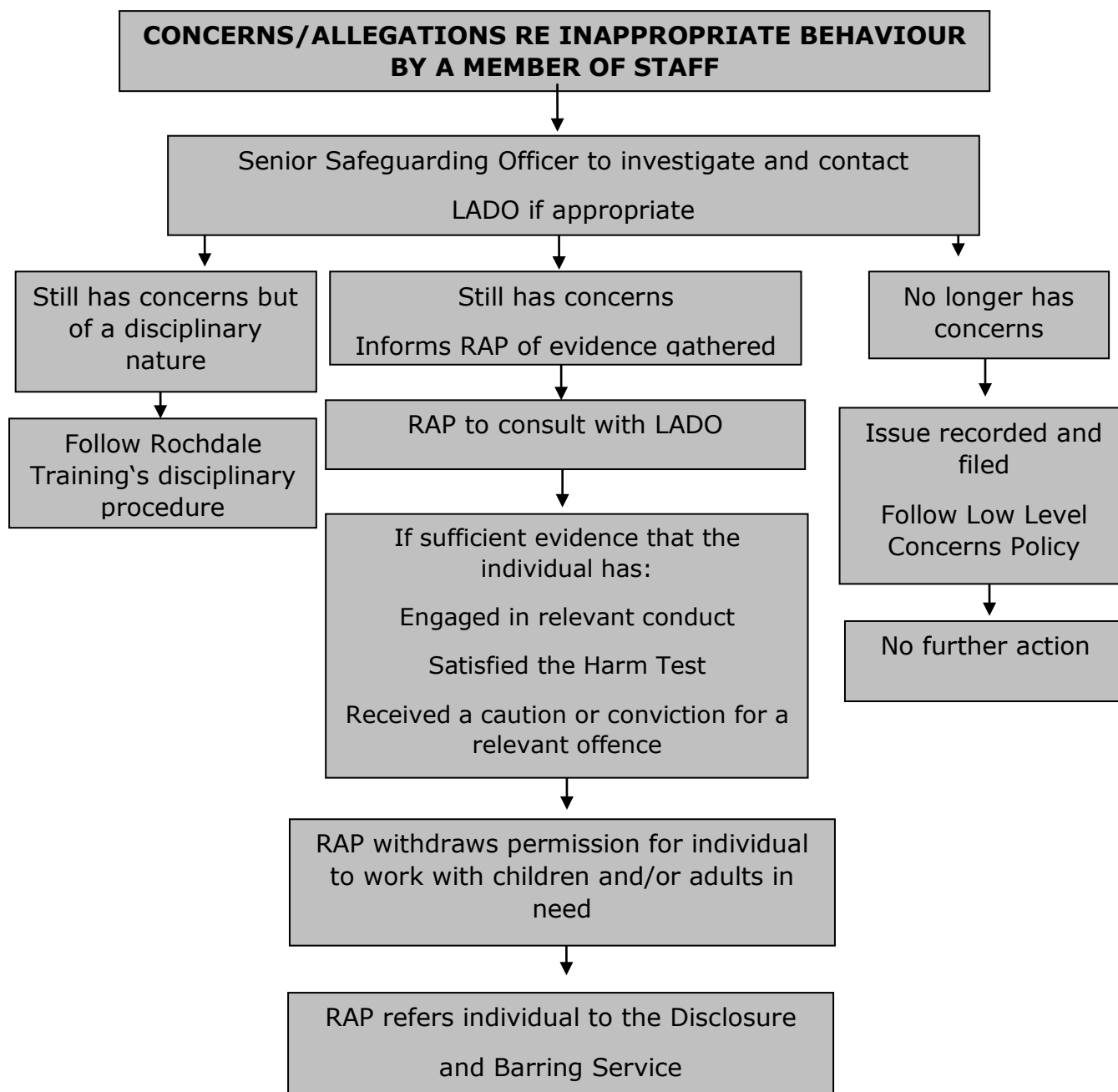
Please contact the Safeguarding Officers with any concerns:

Rachel Yates: Landline: 01706 631417 Mobile: 07860 919379 Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Landline: 01706 631417 Mobile: 07377 400379 Email: safeguarding@rochdaletraining.co.uk

Flow Chart 2 – Referral of Staff & Volunteers

Referral of Staff & Volunteers who give cause for concern to the Disclosure and Barring Services (DBS)



LADO – Local Authority Designated Officer
See Rochdale Training's Guidance for Safeguarding Officers

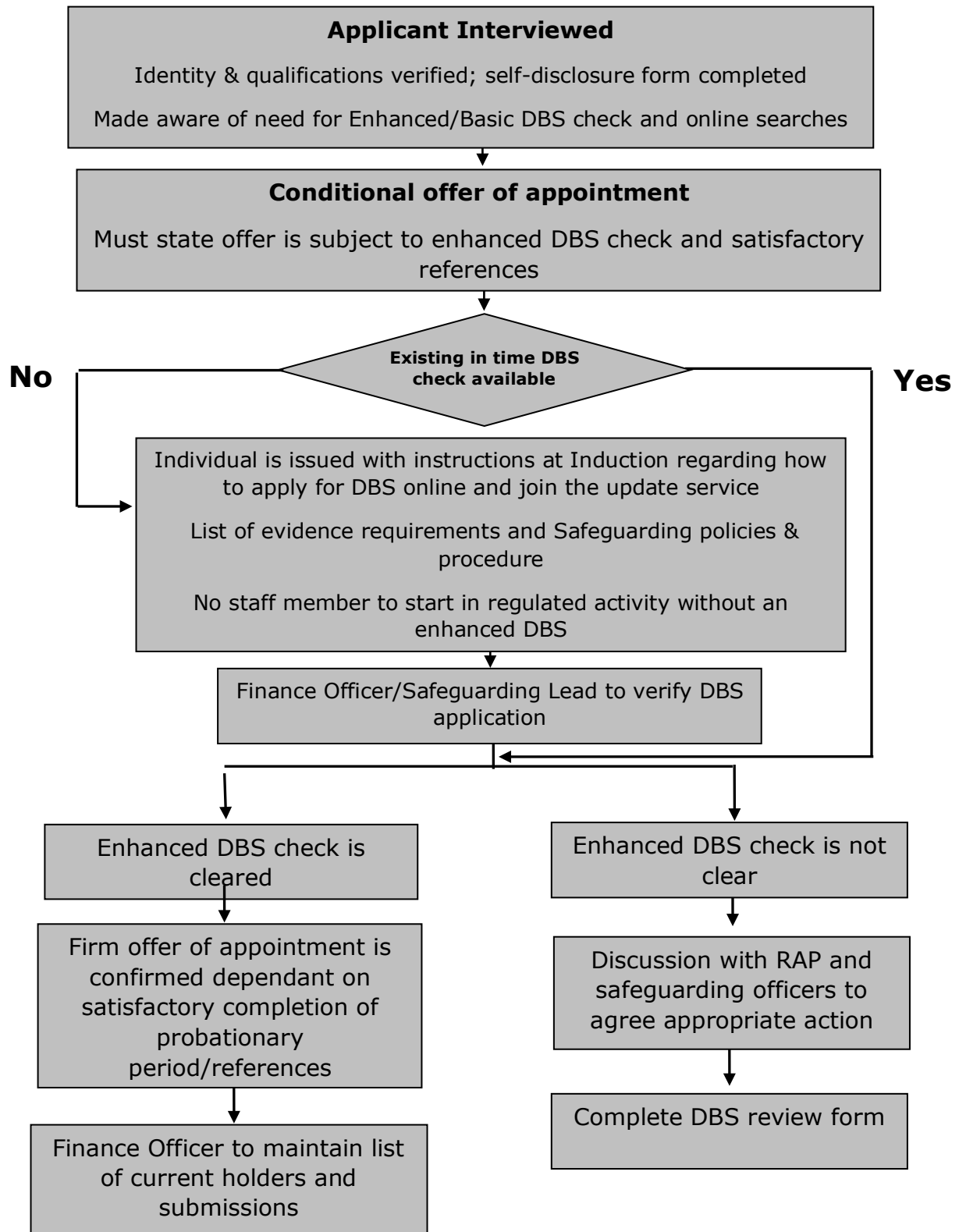
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Flow Chart 3 – Disclosure & Barring Service (DBS)

Disclosure and Barring Service (DBS) Checks Procedure Recruitment/Selection and Induction of all staff



FREEDOM OF INFORMATION POLICY

Introduction:

Rochdale Training is committed to making available to the public, as much information as possible about their activities. This information may be made available by Rochdale Training through published documents (including those published on our website) or upon request.

Adopting a publication scheme is a requirement of Section 19 of the Freedom of Information Act 2000. The purpose of the Act is to promote greater openness by public authorities, which includes Training Providers.

The Scheme provides a description of the types of information that the Information Commissioner expects Training Providers to make available to the public.

This policy details how Rochdale Training will comply with their responsibilities under the Freedom of Information Act.

Information to be made available:

A significant volume of routinely published information is made available to the public as a matter of course via the Publication Scheme. This information includes:

1. Who we are and what we do

- Our Memorandum and Articles of Association
- Rochdale Trainings' Structure and Governance information
- Information relating to organisations Rochdale Training works in partnership with
- Location and contact details
- Information for learners, including safeguarding support and information for parents/employers

2. What we spend and how we spend it

- Funding Information
- Annual Statement of Accounts
- Financial Regulations and Procedures

3. What our priorities are and how we are doing

- Business Plan
- Vision, Values and Mission
- Annual Board Report
- Self-Assessment Report
- Ofsted Inspection Report
- Links with Employers

4. Our policies and procedures

- Safeguarding Policy, Procedure, Guidelines and Documents

- Complaints Policy, Procedure and Guidelines
- Modern Slavery Statement
- Equality & Diversity Policy
- Health & Safety Policy

5. The services we offer

- Apprenticeships and course content
- Welfare and counselling services
- Careers advice
- Inclusion and Support

Ownership

Overall responsibility for this policy lies with the Data Protection Officer who will promote compliance with the Act within Rochdale Training.

Responsibilities

Compliance with the Freedom of Information Act is the responsibility of all Rochdale Training employees.

Specific Requests for Information

The Freedom of Information Act introduces two basic rights to individuals:

- The right to be told whether information exists, and
- The right to receive the information in a specific format

Information not made routinely available according to the Rochdale Training's Publication Scheme is available through a specific request for information. Anybody can make a request for information and all requests will be dealt with by the Data Protection officer.

Requests for information which is not routinely made available should be made in writing and a charge may be made for processing them. If information is requested which is subject to exemptions, this will be reviewed by the Data Protection Officer and requests may be denied. Anyone requesting such information will be advised of this fact in writing.

Rochdale Training will respond to requests within 20 working days unless additional time is required to locate any information requested. If a fee is chargeable, this response period may be extended until the fee is paid. If there is likely to be a delay for either of these reasons, the applicant will be advised in writing by the Data Protection Officer.

Rochdale Training does not need to make available the information listed above where:

1. We do not hold the information.
2. The information is exempt under of the Act's exemptions, or its release is prohibited under another statute.
3. The information is readily and publicly available from an external website to which we have already provided a direct link.

4. The information is archived, out of date or otherwise inaccessible.
5. It would be impractical or resource-intensive to prepare the material for the release.

Personal data is covered by GDPR and is not usually available for public access

Fees & Charges

Unless otherwise specified information made available through the Rochdale Training's Publication Scheme will be free of charge.

Right of Appeal

You can appeal about the range, amount and format of information we have sent following a request. You can also appeal about the way a request was handled – for example, the time it took to respond, or the way responses were worded.

If you are not happy with how we have dealt with your request, write to the address below setting out the reasons why you are unhappy with the response you received.

Data Protection Officer
Rochdale Training
Fishwick Street
Rochdale
OL16 5NA

Our appeals process will involve a formal review of our response by a member of the Senior Management team who will review the original request. You will receive a formal reply detailing our decision within 20 working days.

The outcome of the review will be either:

1. To uphold our original response with an explanation of why we believe we fulfilled your request.
2. Where it is evident, we did not provide an appropriate response in compliance with the Act, or provide a high quality, timely service we will make any necessary corrections, apologise and where appropriate provide you with the information requested.

In the event that an applicant is unhappy with the outcome of the Complaints Procedure, she/he may request an independent review. Requests for an independent review should be made in writing to:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

GDPR POLICY

(previously known as Data Protection and Computer Security Policy)

It is the Company's aim to ensure that it complies with the requirements of relevant legislation, including the Data Protection Act 2018.

The Company will do its utmost to guard against the following:

- (Storing) Retention of inaccurate, incomplete or irrelevant information.
- Unauthorised access to (stored) retained information
- The use of information for a purpose other than for which it is intended.
- The use of unauthorised equipment or software.
- Any breach of specific security measures or procedures.
- Unauthorised links with external sources.

All data processors and controllers are required to read and understand the following policies and procedures that have been designed to prevent any of the above.

- Document and Data (Storage) Retention, Archiving and Erasure Policy
- Use of Technology, IT Facilities and IT Access Control Policy
- Data Incident/Breach Procedure
- Privacy Notices (under review)

Inclusion of Assessment Evidence (to be read in conjunction with the Assessment Policy)

When Tutors or Training Officer's make live video or voice recordings of assessment(s), they must gain the prior consent from all participants at the start the recording. Failure to do so will be a breach of this policy.

Where Tutors or Training Officer's make voice recording(s) for assessment(s) after an assessment has been completed, they must be conscious not to record anything which could constitute a GDPR data breach relating to an organisation, the learner or any other person/organisation involved.

All recordings must be between 10-15 minutes maximum in duration.

A breach of this Policy may lead the Company to instigate the Disciplinary Procedure.

GDPR

(General Data Protection Regulations)

Best Practice Reminder

1. Reduce old data – “spring clean”.

2. Basic security – most data breaches are human error

- Lock computers.
- Don't over share (think about who needs to be copied in).
- Take care with email addresses – especially auto-complete.
- Be aware of scams, just because an email looks as though it is from an individual doesn't mean it is genuine. If requesting sensitive personal information or financial information contact the individual by another means to verify before responding or sharing personal data – if in doubt ask CNT, our IT Support Service.

3. Passwords

- Never share passwords.
- Change them regularly, consider using longer “passphrases”.

4. Be Polite

- Avoid unnecessary personal comments.
- Assume the person you are writing about may one day read what you write!

5. Security

- If you log into any public computers – e.g. guest accounts in classrooms, please ensure that you log out of your emails or any websites with confidential information on as the next user will be able to access these if not logged out.

6. Updates

- Ensure that your PC and any classrooms PC's are shut down after use, this ensures that windows updates can install correctly.

7. Don't share information without being clear you can do so

- Remember information is personal, only share information about individuals with that individual and as needed for the task with third parties who are entitled to information, if in doubt – check.

8. Requests for information and Subject Access Requests

- Report the request to the **Data Protection Officers: Sarah Ogden or Lee Shackleton;** who will manage the request. We have a policy for addressing requests.

9. Data breach or security concerns?

- Report them internally, we have procedures to manage how we should respond to breaches.

ICT ACCEPTABLE USE POLICY FOR LEARNERS

What is an AUP?

We ask all young people and adults who use systems at Rochdale Training to sign an Acceptable Use Policy (AUP), which is a document that outlines how we expect them to behave when they are online, and/or using centre networks, connections, internet connectivity and devices, cloud platforms and social media (both when in centre and outside of centre).

Why do we need an AUP?

These rules have been written to help keep everyone safe and happy when they are online or using technology. Sometimes things go wrong, and people get upset, but these rules help us avoid it where we can.

Rochdale Trainings systems and users are protected and monitored by security and filtering services to provide safe access to digital technologies. This means everything you do on a Rochdale Training device or using our networks/platforms/internet (including from home when learning) may be viewed by one of the staff members who are here to keep you safe.

But it's not about systems and devices – it's about behaviour. So, the same rules apply when you are at Rochdale Training as when you are home learning or just having fun with friends.

All of the points in the list on the next page below can be summarised as follows:

“Treat yourself and others with respect at all times; treat people in the same way when you are online or on a device as you would face to face.”

What am I agreeing to?

1. I will treat myself and others with respect at all times; when I am online or using any device, app, site or game at Rochdale Training and at home.
2. I consider my online reputation with everything that I post or share – I know anything I do can be shared and might stay online forever (even on Snapchat or if I delete it).
3. I will tell an adult or a safeguarding officer if I have a problem or I am worried about something online.
4. If I find (or somebody tells me) something violent, sexual or otherwise worrying, I will not share or forward it, and I will ask an adult or safeguarding officer for advice/help.
5. I will ensure that my online activity or use of mobile technology, in Rochdale Training or outside, will not cause my training provider, the staff, learners or others distress or bring the training provider into disrepute.
6. I will only use Rochdale Training's internet, systems, devices and logins for work-related activities or for activities that are appropriate to what I am doing at that time.
7. Whenever I use the internet or devices in centre OR use Rochdale Training devices at home, I understand my activity will be monitored.
8. I will keep logins, IDs and passwords secure and change my password regularly. If I think someone knows one of my passwords, I will change it; if I think they have used it, I will tell a tutor.
9. I will not try to bypass Rochdale Training security in any way or access any hacking files or tools.
10. I will only edit or delete my own files and not try to view, change or delete other people's files or work.

11. I will use the internet, apps, sites & games responsibly; I will not use any that are inappropriate for Rochdale Training, including sites which encourage hate or discrimination.
12. I understand that any information I see online could be biased and misleading, so I should always check sources before sharing (fake news). I understand that AI can generate text, images, videos that look real but might not be. Therefore, I will always check sources.
13. I understand that using technology to bully online is just as unacceptable as any other type of bullying. I will not use technology to bully, impersonate, harass, threaten, make fun of or upset anyone at Rochdale Training or outside.
14. I know just calling something banter doesn't make it okay and it is not an acceptable statement.
15. I will not post, look at, up/download or share material that could be offensive, harmful or illegal. If I come across any, I will report it immediately.
16. When I am at Rochdale Training, I will only message or email people if it's relevant to my learning.
17. I will be careful when opening files and attachments, checking for viruses etc. If I am unsure, I will not open a file, hyperlink or any other attachment.
18. I will always check my privacy settings and know who can see what and when.
19. I know when talking to people online they might not be who they say they are, so I will be mindful of this. Unless I have met them face to face, I can't be sure who they are.
20. When learning remotely, teachers and tutors will not behave any differently to when we are in centre. This means I need to behave in the same way.
21. I will only use my personal device (mobile) in centre if I have been given permission, and I will never take secret photos, videos or recordings of teachers or students, including when learning remotely.
22. I will be mindful of what I share on camera and not share or post photos or videos that show me or anyone else without all my/their clothes on.
23. What I do on devices should never upset or hurt others & I shouldn't put myself or others at risk. I will never set up fake accounts or pretend to be someone else.
24. If I see, watch, read, hear or receive anything I am unhappy with or receive a message that makes me feel uncomfortable, e.g. bullying, sexual, extremist/hateful content, I will not respond to it but I will talk to a trusted adult/safeguarding officer about it.
25. It is illegal to view any form of pornography if you are under 18 years old; I will not attempt to do so and will report anyone who tries to trick me into doing so.
26. I can always say no online, end a chat or block someone; I understand I can report inappropriate behaviour including sexual harassment, to the safeguarding officers or a trusted adult.

I have read and understand these rules and agree to them.

Signed: _____

Date: _____

ICT ACCEPTABLE USE POLICY FOR STAFF AND VOLUNTEERS

Why do we need an AUP?

All staff (including support staff) and volunteers have particular legal/professional obligations and it is imperative that all parties understand that online safety is part of safeguarding as well as part of the curriculum, and it is everybody's responsibility to uphold the Rochdale Training's strategy and policy as detailed in the full online safety policy.

What am I agreeing to?

1. This policy is for staff and volunteers. I have read and understood Rochdale Training's full online safety policy as well as the acceptable usage policy and agree to follow the guidance given for my behaviour as an adult and enforcing the rules for learners. I will report any breaches or suspicions (by adults or young people) in line with the policy without delay.
2. I understand it is my duty to support the safeguarding policies and procedures and will report any behaviour which I believe may be inappropriate or concerning in any way to the Designated Safeguarding Lead.
3. **During remote learning:**
 - I will not behave any differently towards students compared to when I am at Rochdale Training. I will never attempt to arrange any meeting, including tutoring sessions, out of working hours without prior knowledge and approval from my line manager.
 - I will not attempt to use a personal system or personal login for remote teaching or set up any system on behalf of Rochdale Training without management approval.
 - I will conduct any video lessons in a professional environment as if I am in Rochdale Training. This means I will be correctly dressed, and the session will be conducted in an appropriate place. The camera view will not include any personal information or inappropriate objects – the corporate background will be used where possible.
4. I understand that in past and potential future remote learning and lockdowns, there is a greater risk for grooming and exploitation as learners spend more time at home and on devices; I must play a role in supporting educational and safeguarding messages to help with this.
5. I understand the responsibilities listed for my role in Rochdale Training's Online Safety Policy and the one to one protocol policy. This includes promoting online safety as part of the curriculum, as well as safeguarding considerations when supporting students remotely.
6. I understand that Rochdale Training's systems and users are protected by security, monitoring and filtering services, and that my use of these devices,

systems and logins on my own devices and at home (regardless of time, location or connection) including encrypted content, can be monitored/captured/viewed by the relevant authorised staff members.

7. I know the filtering and monitoring systems used within Rochdale Training and the types of content blocked and I am aware of the increased focus on this are in KCSIE 2023.
8. I understand that all one to one online sessions must be recorded.
9. I understand that I am not able to conduct any one to one online sessions for learners under the age of 18 without parental consent.
10. I understand that I am a role model and will promote positive online safety and model safe, responsible and positive behaviours in my own use of technology, including social media, e.g. by:
 - Not sharing other's images or details without permission
 - Refraining from posting negative, threatening or violent comments about others, regardless of who they are.
11. I will not contact or attempt to contact any learner or to access their contact details in any way other than Rochdale Training approved ways and I will report any breach of this by others or attempts by learners to do the same to the safeguarding lead.
12. I understand the importance of upholding my online reputation, my professional reputation and that of Rochdale Training and I will do nothing to impair either.
13. I agree to adhere to all provisions of Rochdale Training's GDPR Policy at all times, whether or not I am on site or using a Rochdale Training device, platform or network, and will ensure I do not access, attempt to access, store or share any data which I do not have express permission for. I will protect my passwords/logins, never share credentials and immediately change passwords when requested.
14. I will not store Rochdale Training related data on personal devices, storage or cloud platforms. I will only use safe and appropriately licensed software, respecting licensing, intellectual property and copyright rules at all times.
15. I will never use Rochdale Training's devices and network/internet/platforms or other technologies to access material that is illegal or in any way inappropriate for an education setting. I will not attempt to bypass security or monitoring and will look after devices loaned to me.
16. I will not support or promote extremist organisations, messages or individuals, nor give them a voice or opportunity to visit Rochdale Training. I will not browse, download or send material that is considered offensive or of an extremist nature.

17. I will take a zero-tolerance approach to all forms of child-on-child abuse, not dismissing it as banter, this includes bullying, sexual violence and harassment and maintain an attitude of "it could happen here".
18. I will be mindful of using appropriate language and terminology around learners when addressing concerns, including avoiding victim blaming.
19. I will follow the guidance in the safeguarding and online safety policies for reporting incidents: I understand the principle of "safeguarding". I have read the updated keeping children safe in education 2023 (KCSIE) and the acceptable usage policy and understand my role.
20. I understand that breach of this AUP and/or of Rochdale Training's full online safety policy and one to one protocol policy may lead to appropriate staff disciplinary action.

I have read and understand these rules and agree to them.

Signed: _____

Date: _____

SAFEGUARDING INCIDENT/OFFENCE REVIEW FORM

1. The Nature of the Offence
2. Actions Taken
3. Findings
4. Outcome of the Review <i>(decision made following the review in line with the Safeguarding and Procedure)</i>

Date of Review:		
Person Completing this form:	Name and Title	
Signature:		
Date:		

Safeguarding Officer:	Name and Title	Rachel Yates: Operations Manager
Signature		
Date:		

Safeguarding Officer:	Name and Title	Josh Harper: Level 2 Mentor
Signature		
Date:		

INFORMATION FOR PARENTS

Rochdale Training feels it is of the utmost importance to have good systems for safeguarding children, young people or an adult in need throughout all the activities which the centre undertakes. This means that staff and visitors must be alert to possible concerns about every learner, and to report these in a proper fashion. Rochdale Training has a safeguarding policy: parents/learners may request a copy of this.

It is important for parents/learners to be aware that:

- Staff and visitors in the centre have a duty to report concerns about a child, young person or adult in need, whether this means the child, young person or adult in need may be in need of additional support or help of some kind or whether it is thought that a child, young person or adult in need may have been abused or be at risk of abuse.
- There are several categories of abuse. These include but are not limited to: physical, sexual, emotional, neglect.
- In some cases, Rochdale Training is obliged to refer children, young people or adults in need to social care staff, for them to be assessed for their needs or if an investigation into possible abuse is required. In many cases there will already have been discussions between centre staff and the parents/carers, and the situation and concerns will not be a surprise. However, parents/carers may not be told that Rochdale Training has made a referral to social services if it is thought that this might put the child, young person or adult in need at risk.
- Social care tries to carry out its enquiries in a sensitive fashion. It has to gather information and generally it can be open with parents/carers about the steps being taken.
- If you think your child, young person or adult in need may have been abused you can contact the social care office or the Local Authority's Access & Welfare Service direct. If you think the abuse may have happened in the centre, contact one of the Designated Safeguarding Officers:

Rachel Yates: Operations Manager

Landline: 01706 631417 ext 159
Mobile: 07860 919379
Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Level 2 Engineering Mentor

Landline: 01706 631417 ext 155
Mobile: 07377 400379
Email: safeguarding@rochdaletraining.co.uk

- If you think your child has been hurt, arrange to visit your doctor.
- If centre staff need to express concerns about a child, young person or adult in need or refer to social care, it is understood that this can cause distress or anger for the parents/carers. It is important that all parties – parents and centre staff – try to discuss these matters as calmly and sensibly as possible.

For parents' enquiries please contact:

Rachel Yates, Operations Manager/ Safeguarding Lead.

Landline: 01706 631417
Email: ryates@rochdaletraining.co.uk

Online safety information for parents and carers

Understand the risks children may need to deal with:

What they might see or do:

- Seeing or sharing of violent, sexual and pornographic content
- Inaccurate or false information and extreme views
- Promotion of harmful behaviours including self-harm, anorexia and suicide
- Over-sharing of personal information
- Actively or unintentionally getting involved in bullying or hurtful behaviour

Who they might meet:

- People who bully, intimidate or frighten
- People posing behind fake profiles for:
 - Mischief-making
 - Sexual grooming and stalking
 - Blackmail and extortion
 - Identity theft and hacking

How could this affect them:

- Fear of missing out leading to excessive use or exaggeration
- Getting upset by things they have seen and being uncertain about what to do
- Engaging, or being pressured into engaging in more risky behaviour either by accident or by design

Practical tips to help minimise the risks your child might face:

It's good practice for apps and websites to have safety advice and well-designed safety features which can make a real difference to how safe your child will be when using them. Work through safety and privacy features on the apps that your child is using or might use. Make sure they understand the point of these and how to use them.

Don't be put off by believing your child knows more than you: the tools are actually quite easy to manage.

- Ask them to show you which social media apps they use and what they like about them. Talk about how they use them and what makes them so engaging.
- Explain how you can use privacy settings to make sure only approved friends can see posts and images.
- Check if any of their apps have 'geo-location' enabled, sharing their location unintentionally.
- Show them how to report offensive comments or block people who upset them.
- Check 'tagging' settings so that when others are posting or sharing photos online, your child's identity is not revealed. Also, get people's consent before sharing photos.
- Encourage your child to come and talk to you if they see anything that upsets them.

For more information:

You can find out more about how children use social media, the apps they use, the risks they face, how to use privacy settings and advice and tips about how to talk to your children at:

- www.childnet.com/sns
- www.internetmatters.org
- www.nspcc.org.uk/onlinesafety
- www.parentzone.org.uk
- [www.parentzone.org.uk \(www.parentzone.org.uk\)](http://www.parentzone.org.uk)
- www.askaboutgames.com

Online safety at Rochdale Training:

At Rochdale Training, children's and learners' welfare is well promoted and one of our core values.

We use "Sophos" "Watch Guard", "Cisco Meraki" and "Barracuda" to help us filter and monitor online content. These packages will block any inappropriate content such as: hate crimes, serious violence, chat rooms and games. A weekly report is produced showing online activity meaning inappropriate usage can be checked and challenged. The aim is to keep our learners as safe as possible. With this in mind, learners will not be able to use Rochdale Training's wi-fi without permission. If inappropriate usage is found, sanctions may be put in place, but more importantly pastoral support and education will take place.

Although learners may be asked to use "online methods" to help with their study, specific websites relevant to the subject area will be recommended. We also use a secure online e-portfolio for learners to gather their evidence. Only authorised users i.e. tutor's and managers will be able to contact a learner through this system. This will always be in relation to their qualification or in response to support required.

If you have any concerns or questions regarding online safety at Rochdale Training, please don't hesitate to contact one of the Safeguarding Officers.

Rachel Yates: Operations Manager

Landline: 01706 631417 Ext 159
Mobile: 07860 919379
Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Level 2 Engineering Mentor

Landline: 01706 631417 Ext 155
Mobile: 07377 400379
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INSTRUCTIONS TO SAFEGUARDING OFFICERS

Safeguarding of Children and Adults, including adults in need

Introduction

Key responsibilities are placed upon Rochdale training, under civil and criminal law and government direction, to safeguard children and adults, including adults in need. This means doing our very best to ensure that they do not come to harm. If in doubt you must put children and adults, including adults in need, first.

Safeguarding involves protecting those that are more vulnerable from harm, abuse or neglect. It is also about preventing impairment to health, safety and development and ensuring learners are growing up, training and working in circumstances that optimise their life chances.

It is the responsibility of Safeguarding Officers to guide and encourage Rochdale Training staff and volunteers to keep all our learners safe from harm and to take direct action to protect, nurture and support them to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic wellbeing.

You are advised to take note of the following aspects of the Safeguarding Policy

- The welfare of a child or adults in need is paramount;
- All humans without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs etc.
- Our Safeguarding Policy is approved and endorsed by the Board of Trustees;
- The policy applies to all managers, staff and volunteers and learners;
- Learners and parents are to be informed of the policy and procedures as appropriate;
- All concerns, and allegations of abuse will be taken seriously by trustees, staff and volunteers and responded to appropriately - this may require a referral to children's or adult services and in emergencies, the Police;
- Rochdale Training has a commitment to safe recruitment, selection and vetting;
- Rochdale Training will abide by the principles, legislation and guidance that underpin the policy;
- The policy and procedures will be regularly reviewed – not less than once per year;
- There are associated policies and procedures which promote children's safety and welfare e.g. with regards to: Health and Safety, anti-bullying and anti-radicalisation, Online Safety, Child on Child abuse.

As safeguarding officers, you can best view your safeguarding responsibilities as being divided up into three areas or key aspects.

1. Management of Safeguarding including audit of the safeguarding provision and OFSTED inspection preparation.
2. Ensuring the safety of learners
3. Reporting: Referral of staff and volunteers who give cause for concern to the Disclosure and Barring Service (DBS) via the RAP.

The Key Aspects

1. Key Aspect - Management of Safeguarding

Rochdale Training is subject to the Safeguarding Vulnerable Groups Act 2006 and the revision of some of its aspects by the Protection of Freedoms Act 2012. Under these laws and because it has a government contract to train learners under the age of 18 it is a Regulated Activity Provider. It has appointed a member of senior management to act as the signatory to formal reporting to the Disclosure and Barring Service. This person is the chief executive and known as the RAP.

The RAP for Rochdale Training is therefore Jill Nagy.

The RAP is a person capable of asking a staff member or volunteer to stop work, moving them from one post to another or ceasing their employment. The RAP is bound by criminal law to report certain activities by staff and volunteers and by learners engaged in training for regulated activities, to the Disclosure and Barring Service (DBS) in accordance with current regulations, using correct documentation. No other person apart from the RAP is empowered to refer staff to the DBS. The details of the referral methods are set out in Key Aspect 3 below.

The RAP is required to ensure that the DBS check system set out in Part 1 of the Procedures (see annex below) are adhered to. Some DBS check requirements will also include a barring check with the DBS.

Rochdale Training managers are contractually liable to the RAP to ensure that all necessary checks are carried out on staff and that they do not begin work without the formal signed approval of the RAP.

Legitimate Interest

The RAP has a legal legitimate interest in all staff and volunteers and therefore no existing member of staff or existing volunteer is permitted to invite any other person to perform any kind of work, regulated or not for or on behalf of Rochdale Training without the full knowledge and approval of Rochdale Training's management

Regulated activity is work teaching, training, assessing, instructing, advising or counselling a child, namely a person under the age of 18 years, or adults in need (under the Department of Health definition), frequently, intensively or overnight.

- Frequently means: Once per week or more
- Intensively means: Four days per month or more
- Overnight means: Any time between 2am and 6am

The contact is with children or adults in need generally. Whether it is the same child or adult or a different one each time does not make any difference.

Adults in Need

A member of staff or volunteer only takes part in regulated activity with an adult in need when they do work which is listed in the **Department of Health** document called:

STATEMENT OF GOVERNMENT POLICY ON ADULT SAFEGUARDING 2011

This document explains that the Protection of Freedoms Act 2012 altered the definition in the case of adults so that it is unlikely that any adult in learning at Rochdale Training would be considered to be in need in law for the purpose of reporting offences against them to the Disclosure and Barring Service.

Nevertheless, equality and human rights legislation, and normal human kindness requires that staff and volunteers act to protect adults who would in normal parlance and common sense be considered vulnerable. Please refer to the Rochdale Training Adult Safeguarding Policy for further guidance.

Rochdale Training Safeguarding Officers are always to have regard to the possibility that a child or adult, including an adult in need could be abused physically, emotionally, sexually, financially or by neglect.

Possible abuse of children and adults

It is important for staff to note that cases of potential abuse must be acted upon by Safeguarding Officers using two different methods:

At Work: If they receive reports concerning unacceptable activity by staff or volunteers working for Rochdale Training or other learners attending Rochdale Training, they will need to act in accordance with the procedures set out below.

Not at Work: If they receive reports from Rochdale staff, volunteers or learners about abuse taking place away from the training premises, for example grooming activities in Rochdale town, they will need to consider reporting the information to the police or social services. The RAP is not to report external offences to the DBS but should gain guidance from the Rochdale Borough Safeguarding Children's Partnership or Adult Protection Committee of the local authority where appropriate. This is because the RAP cannot take disciplinary action against any person not working for Rochdale Training and disciplinary action is a requisite precursor to formal reporting.

2. Key Aspect - Ensuring the safety of learners

Aspects of Concern to Safeguarding Officers and all Rochdale Training staff and volunteers

Recognising signs of abuse

It can often be difficult to recognise abuse. The signs listed below may have an innocent explanation but can also be the key to identifying potential abuse.

If you are worried about a learner, it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

Physical Abuse

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It is against the law to discipline a child or young person by deliberately doing any of these things. There are special rules for restraining children and adults.

Special cases: Physical abuse can also result when a parent or carer deliberately causes the ill health of a child in order to seek attention; this is called fabricated, induced or factitious illness. (Previously called Munchausen's Syndrome by Proxy).

Benefit Fraud by Proxy: You should also be aware that some people have been obtaining social benefits by deception – illegally causing or forcing a child to seem ill to get money to support them.

Symptoms that indicate physical abuse include:

- Bruising in unusual places, such as the face or the back
- Finger mark bruising or grasp marks on the limbs or chest
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs
- Large numbers of scars of different sizes or ages

Sometimes what seems to be a case of physical abuse can turn out to be a medical condition – for example brittle bone disease, so professional advice should be sought during any investigation.

Children or young people who have been physically hurt can be fearful of others. They may also wear clothes that cover most of their body in order to cover their injuries and be reticent when asked to explain how the injury happened.

A large proportion of abuse takes place in the home. Sometimes children say they have been abused but do not want to say who did it. It is vital that you should not tell parents what children report until you have consulted to discover if it is the home environment that is causing the children's apparent suffering. If you tell the parents or carers without checking or taking professional advice and it turns out to be caused by people in the home environment the child will suffer even more.

Emotional Abuse

Emotional abuse happens when a child or young person's need for love, security, praise and recognition is not met. Some level of emotional abuse is involved in all types of ill treatment. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when a child or young person is prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness

- Anxious behaviour, such as rocking, hair twisting or self-harm
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

Neglect

Neglect is the persistent failure to meet basic physical and/or psychological needs, causing damage to health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child or young person from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse. Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education
- Inadequate nutrition, leading to ill-health – a child or young person may look too thin, too fat and/or undernourished
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child or young person's life or development is endangered
- Repeated wearing of inappropriate clothing for the weather
- Mental illness of a parent or carer

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child or young person is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities, harassment or looking at pornographic material. Encouraging children or young people to act in sexually inappropriate ways is also abusive. Under the Sexual offences Act 2003, any sexual activity – contact or non-contact – with a child under the age of 13, is a crime. Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sex; inappropriately sexualised play, words or drawing
- A child or young person who is sexually provocative or seductive with adults
- Sexual activity between under-age peers or older and younger children in the same family or group

Other children and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- School/peer/relationship problems

Special cases of Abuse

In addition to the above, there are some areas of national concern with special action and reporting rules for Safeguarding Officers:

- Forced marriage
- Honour killings and honour-based violence sometimes called 'izzat'
- Female genital mutilation
- Witchcraft and pseudo-Sangoma witchdoctor culture
- Spirit possession
- Specific abuse of albinos
- Unnecessary or inappropriate interference with the body by doctors or other members of the medical profession
- Domestic abuse and violence
- Substance misuse and parental drug or alcohol abuse
- Abuse or harm by gangs
- Grooming of young children by gangs
- Online abuse
- Abuse through prostitution or trafficking
- Abuse for religious or cultural reasons
- Racism and violent extremism
- Abuse using information technology (ICT and telephones)
- Children acting as carers
- Unaccompanied asylum-seeking children
- Teachers, tutors and other staff forming emotional relationships with students or learners in their direct care
- Bullying
- Involvement with serious crime
- Children with family members in prison
- Homelessness
- Private fostering
- County line activities
- Upskirting
- Child on Child abuse
- Sexual Violence and Harassment

Please advise staff during induction and staff training sessions that if a learner discloses any one of the special abuse types above then TAKE NO ACTION until you have spoken to a Safeguarding Officer. Precipitate action can lead to severe injury or death. For example, trying to act as an intermediary and to conciliate in the case of a prospective forced marriage has led to the murder of the child that another organisation's staff member was trying to protect.

Safeguarding Officers receive special guidance on reporting such cases. The government document Working Together to Safeguard Children and Keeping Children Safe in Education (2022) contains much advice. All staff and volunteers at Rochdale Training should be guided to take an active interest in the subject of safeguarding and the document should be made available for all staff to read.

Reporting Abuse in formal circumstances:

See flowchart on the last page of this document for procedure to follow in cases of possible, alleged or suspected abuse or cause for concern about a child/adult in need.

3. Key Aspect - Referral of staff and volunteers who give cause for concern to the Disclosure and Barring Service (DBS)

The DBS can only consider referrals that are related to safeguarding children or adults in need in the workplace (including volunteers).

Where there are other forms of misconduct not related to safeguarding children or adults in need in the workplace, Safeguarding Officers should refer these cases, as appropriate, to the police, local authority or relevant regulatory body.

If members of the public have any safeguarding concerns about an individual and ask a staff member for advice, they should advise them to contact the police and/or the relevant local authority's children and adults safeguarding team or social services.

Steps to be followed when the RAP is referring to the Disclosure & Barring Service (DBS)

Upon receiving concerns that a member of staff or volunteer may have acted inappropriately with a child or adult in need at work (or intends to do so), the Senior Safeguarding Officer should conduct an investigation and take disciplinary action unless guided by police not to do so while they investigate matters. Once disciplinary action is taken, or the person has retired, resigned or run away then following an assessment of the evidence, the information may then be sent as a referral to the DBS for consideration.

In all cases Safeguarding Officers should also follow Rochdale Training safeguarding and disciplinary procedures and maintain proper records. If appropriate Safeguarding Officers may also need to consult with the governing body or related professional organisation for guidance.

In all cases there are two conditions, both of which must be met to trigger a referral to the DBS by the RAP:

1. RAP withdraws permission for an individual to work with children and/or adults in need – or would have done so had that individual not resigned, retired, run away, been made redundant or been transferred to a position in which they cannot work with children or adults in need frequently, intensively and/or overnight.

Because

2. They think that the individual has:

- engaged in *relevant conduct* (see *Adverse Conduct chart below*)
- satisfied the *Harm Test* (see *Harm test below*); or

- received a caution or conviction for a *relevant offence*.

If both conditions 1 and 2 above have been met the information must be referred to the DBS.

The referral should be made to the DBS when the RAP has gathered sufficient evidence as part of their investigations to support their reasons for withdrawing permission to engage in *work with children or adults in need* and in following good practice, consulted with their Local Authority Designated Officer (LADO) or Health and Social Care Trust Designated Officer if appropriate.

Referral at this point will help to ensure that the DBS has sufficient evidence to commence its decision-making process while providing adequate safeguarding for vulnerable groups.

Personnel suppliers: Duty to refer

Rochdale Training is an 'employment business' under the law if it provides learners to other organisations for jobs.

The Safeguarding Vulnerable Groups Act 2006 (SVGA) places a legal duty on regulated activity providers and personnel suppliers to refer any person to the Disclosure and Barring Service (DBS) who has:

- Harmed or poses a risk of harm to a child or adult in need
- Satisfied the harm test; or
- Received a caution or condition for a relevant offence.

The DBS Referral Form Guidance provide regulated activity providers and personnel suppliers with guidance on how to complete the DBS Referral Form and what information should be provided to meet the duty to refer.

The Safeguarding Vulnerable Groups Act 2006 (Prescribed Information) Regulations 2008 places an additional duty on personnel suppliers to **provide additional information** when referring a person to the DBS. This document is designed to assist personnel suppliers in identifying what information they hold that they are legally required to provide when making a referral.

A personnel supplier may be an employment agency, **employment business** or an educational institution and are described as follows:

- An employment agency makes arrangements to find a work-seeker employment with a hirer or to supply him to a hirer to employ,
- **An employment business engages a work-seeker and supplies him to a hirer to work under a hirer's control.**
- An educational institution is a Personnel Supplier if it makes arrangements to supply a student following a course at the institution to a regulated activity provider such as a school.

Personnel suppliers may provide additional information on separate sheets, within documents or on the DBS Additional Information Form.

Employment agencies / businesses

Employment Agencies and Employment Businesses are required to provide the following information:

- a) Completed DBS Referral Form, providing all relevant information,
- b) Any information held by that personnel supplier under Schedule 4 to the Conduct of Employment Agencies and Employment Business Regulations 2003 (particulars relating to work-seekers) except the information specified in paragraph 10 of that Schedule).

The information to be provided is as follows:

1. Date application received.
2. Work-seekers name, address and, if under 22, date of birth.
3. Any terms which apply or will apply between the employment agency or business and the work-seeker, and any document recording any variation thereto.
4. Details of the work-seeker's training, experience, qualifications, and any authorisation to undertake particular work (and copies of any documentary evidence of the same obtained by the employment agency or business).
5. Details of any requirements specified by the work-seeker in relation to taking up employment.
6. Names of hirers to whom the work-seeker is introduced or supplied.
7. Details of any resulting engagement and date from which it takes effect.
8. Copy of any contract between the work-seeker and any hirer entered into by the agency on the work-seekers behalf.
9. Date of application withdrawn or contract terminated (where applicable).
10. Details of enquiries made under the Conduct of employment agencies and employment business Regulations 19, 20 and 22 about the work-seeker and the position concerned with copies of all relevant documents and dates they were received or sent as the case may be.

Suspension Without Prejudice

It is important to note that withdrawal from *working with children and/or adults in need* **does not** include suspension without prejudice on its own without any substantive evidence, as this would be a neutral act and there would be no evidence at this point to support the thought that a person has engaged in *relevant conduct*, or that the *harm test* is satisfied.

Withdrawing a person from *working with children and/or adults in need* in the context of making a referral does not necessarily mean permanently removing them. The RAP may decide to issue a formal warning and return the staff member to *work with children and/or adults in need* following additional training. However, this **must** still be referred to the DBS.

Where an individual has left employment before the RAP made any final disciplinary decision due to harm or risk of harm to a child or adult in need this information **must** also be referred to the ISA.

Barred Lists

From 12th October 2009 there are now only two barred lists:

1. Children's barred list
2. Adults in need barred list

A banned person can be on one or both lists.

Although matters of concern can be discussed informally with the DBS prior to a decision to take disciplinary action, once a decision to refer formally has been made by the RAP following discussion with safeguarding officers, all referrals to the DBS must use the **DBS Referral Form**.

The completed and signed DBS Referral Form and supporting evidence and documents should be posted to the DBS. It is important that the RAP is aware that any information used by the DBS may be disclosed for the purposes of representation or an appeal. However, if the correct form is used the person named cannot take legal action against Rochdale Training for breach of confidence.

Considerations Prior to Disciplinary Action

The RAP and safeguarding officers will consider:

Relevant conduct

Relevant conduct is any conduct:

- That endangers a child or adult in need or is likely to endanger a child or adult in need;
- If repeated against or in relation to a child or adult in need, would endanger them or would be likely to endanger them;
- That involves sexual material relating to children (including possession of such material);
- That involves sexually explicit images depicting violence against human beings (including possession of such images), if it appears to DBS that the conduct is inappropriate; or
- Of a sexual nature involving a child or adult in need, if it appears to DBS that the conduct is inappropriate.

Harm Test

The harm test is that the RAP is satisfied that an individual may:

- harm a child or adult in need;
- cause a child or adult in need to be harmed;
- put a child or adult in need at risk of harm;
- attempt to harm a child or adult in need; or
- incite another to harm a child or adult in need.

Relevant offence

A relevant offence for the purposes of referrals to DBS is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

Advice to the RAP on Referral Form Completion

The DBS Referral Form contains step by step instructions for completing each section of the Form. However:

- Use black ink to complete the Referral Form.
- Ensure your writing is clearly legible if completing the form by hand.
- Ensure all documents that you are enclosing with the Referral Form are either originals or clearly legible copies.
- When completing the form, provide the information and documents that you hold. If you do not hold the information requested on the form, leave that section blank.
- You should also note that you only need to provide to the DBS, the relevant information or documents that you hold. You do not need to obtain information from another source or draft any documentation (other than the DBS Referral Form) to meet your referral duty to the DBS.
- However, if you are aware of relevant information that is held by another source you should indicate this where required to do so on the DBS Referral Form.
- It is important to remember that the DBS has no powers of investigation and relies on the information provided to it through the referral and information sharing processes to make it's barring decisions. It is essential that the information you provide to the DBS is accurate, comprehensive and complete.

Minimum Information required by the Disclosure & Barring Service

The minimum details that the DBS requires in order to commence its consideration of a case are:

- Information that will clearly establish the identity of the individual such as name, address, date of birth, DBS registration number or National Insurance Number if known etc);

And

- Sufficient evidence to suggest that there has been a *relevant offence* or harm / risk of harm to a child or an adult in need.

Regulated Activity – Advice for Safeguarding Officers

Regulated activity is defined in Schedule 4 of the 2006 Act and Schedule 2 of the 2007 Order. There are four ways Rochdale Training may be involved in regulated activity.

1. Undertake an activity of a specified nature (ie, teaching, training, instruction, care, supervision, advice, guidance, treatment, therapy or transport) that involves contact with children or adults in need on a frequent, intensive or overnight basis.

Or

2. Undertake any activity in a specified place (ie, schools, childcare premises including nurseries, residential homes for children, children's hospitals, children's detention centres, adult care homes or residential care or nursing homes) that provides the opportunity for contact with children or adults in need on a frequent, intensive or overnight basis.

Training, resources and support

Rochdale Training is committed to maintaining highly trained and knowledgeable staff and has identified a range of training which we believe will support our safeguarding responsibilities.

Sharing Information / Confidentiality

An important legal principle must be observed at all times – The welfare of the child, young person or adult in need is paramount. Privacy and confidentiality should be respected where possible but if doing this leaves a learner at risk of harm then their safety has to come first. Nevertheless, staff should always tell their Safeguarding Officer in confidence and this should be explained to staff during their induction and staff training.

You should remember that:

- Neither GDPR nor Data Protection Law prevent safeguarding critical information being shared with those who need to keep people safe.
- Legally, it is fine to share information if someone is worried about the safety of a child, young person or adult in need.
- Not everyone needs to know when a concern or worry is raised. This respects the learner's, family's and/or staff's rights to privacy. So **only people who need to know** should be told about it. Otherwise there might be gossip and rumors or other people may be genuinely concerned.
- It is fine to say that a concern has been raised and it is being dealt with following Rochdale Training's procedures.

Members of staff may have access to confidential information about children or young people in order to undertake their every day responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a learner or her / his family for their own, or others' advantage (including that of partners, friends, relatives or other schools/services). Information must never be used to intimidate, humiliate, or embarrass the learner.

Confidential information about a learner should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the learner's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a learner, for example when abuse is alleged or

suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from a senior member of staff. Any media or legal enquiries should be passed to senior management.

The storing and processing of personal information about learners is governed by the Data Protection Act 1998/GDPR. Do not destroy relevant evidence unless instructed to do so by police or social services,

In addition, Lord Laming has given clear guidance on the need to pass key information on to the next professional in line despite the Data Protection Act.

The Safeguarding Vulnerable Groups Act 2006 requires that certain staff (usually the senior safeguarding officer) liaise with the Rochdale Borough Safeguarding Children Partnership or Vulnerable Adults protection committee and singly or jointly pass information to the DBS.

Key points on information sharing

At the outset - during induction for example, staff should explain to learners and where appropriate (**and when safe to do so**) their families, openly and honestly, what and how information will, or could be shared and why, and seek their agreement.

The exception to this is where to do so would put that child, young person or others at increased risk of significant harm or an adult at risk of serious harm, or if it would undermine the prevention, detection or prosecution of a serious crime including where seeking consent might lead to interference with any potential investigation.

Staff must always consider the safety and welfare of a child, young person or adult in need when making decisions on whether to share information about them.

Where there is concern that a learner may be suffering or is at risk of suffering significant harm, their safety and welfare must be the overriding consideration.

Staff should, where possible, respect the wishes of the learner or their family if they do not consent to share confidential information. Staff may still share information, if in their judgment on the facts of the case, there is sufficient need to override that lack of consent.

Staff should seek advice where they are in doubt, especially where the doubt relates to a concern about possible significant harm to a child or serious harm to others.

Staff should ensure that the information they share is accurate and up-to-date, necessary for the purpose for which they are sharing it, shared only with those people who need to see it, and shared securely.

Staff should always record the reasons for your decision – whether it is to share information or not.

Safer Recruitment of Staff & Volunteers

Rochdale Training will adopt robust recruitment and selection procedures and will ensure that the following standards are followed:

- New members of staff should be clear about their responsibilities for safeguarding and will engage in relevant safeguarding training during their induction;
- Safeguarding responsibilities and Rochdale Training's Safeguarding Policy will be available to everyone and fully discussed as part of the induction process.

See the Rochdale Training Recruitment Policy for further details

Outings & Trips

All learners must be safeguarded when they are away from our Training Centre on outings for trips. In addition, the required Health & Safety risk assessments, the following standards must be applied at all times:

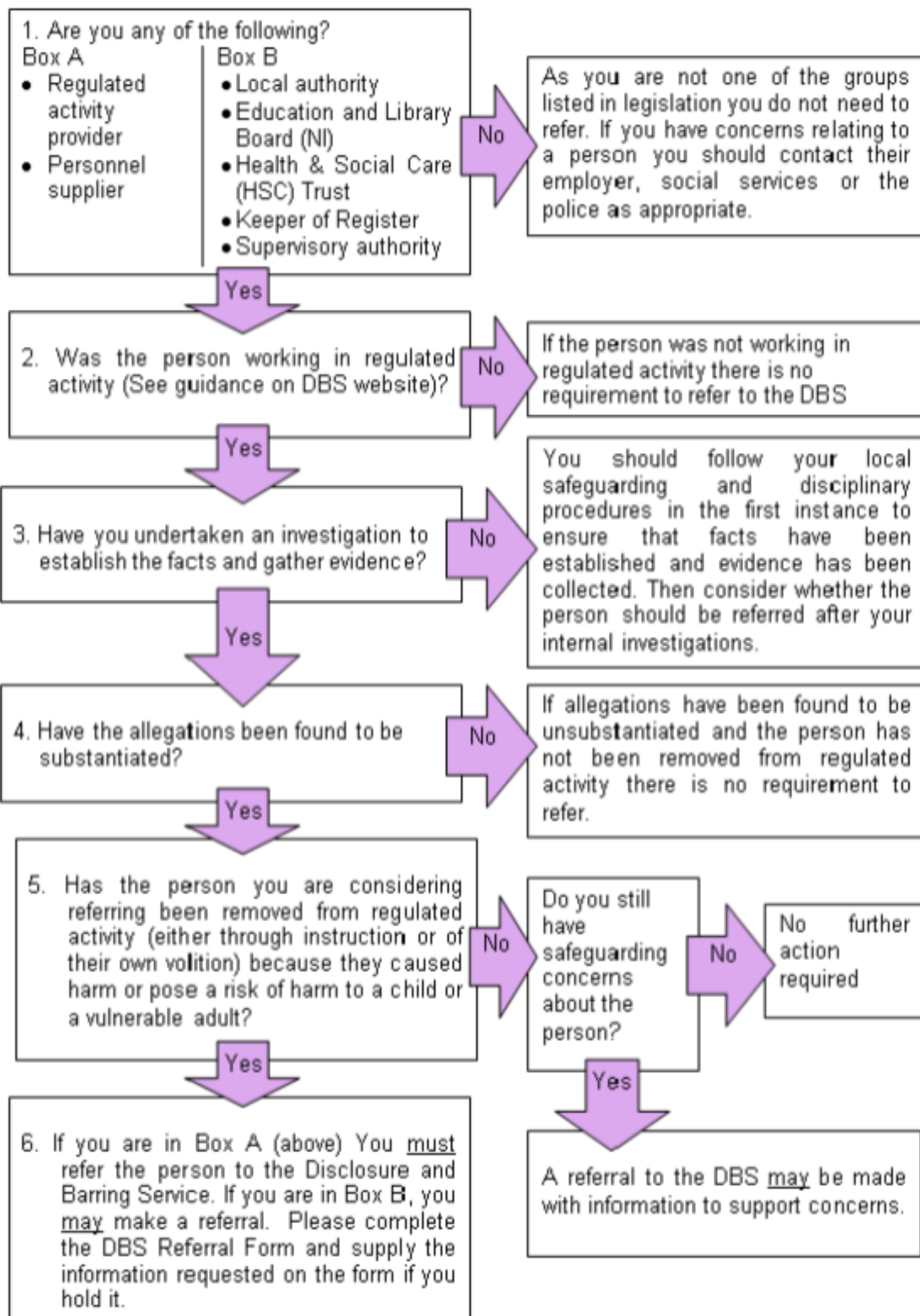
- Parental/carer permission must be granted before children go on trips.
- Any medication learners may need to take with them must be identified prior to the trip taking place.
- All vehicles hired for outings must be insured, roadworthy and fitted with seatbelts;
- All drivers should travel with at least one escort. Drivers and escorts should have up to date DBS checks and been subject to appropriate recruitment procedures. All drivers and escorts must agree to abide by these guidelines;
- Roll call will be taken at the start of a journey and again before commencing the return journey; if travelling in more than one vehicle, children will be encouraged to travel in the same vehicle there and back;
- Staff accompanying trips will carry the contact numbers for the home organisation and emergency services in the event of an alert being necessary;
- If a learner goes missing while on a trip, staff should instigate an immediate search. If the learner cannot be found within half an hour, the appropriate security staff and the police should be notified;
- If, having notified security staff and the police, the learner cannot be found, the parents/carers of the learner will be notified immediately;
- The care of the remaining learners is paramount. It is imperative that they return to the home site as quickly as possible, while a senior staff member remains at the visit site to coordinate contact between security staff and the learner's parents/carers.

Use of premises by other organisations

In the event that a room or rooms on the premises are used by other organisations, the letting agreement should ensure that the hiring organisation works to Rochdale Training's safeguarding standards and/or that they read and agree to abide by the guidelines set out in the policy/guidelines. The agreement will also check that the premises is not used by the extremist groups. All materials being delivered will be checked before their use.

Inspection and Quality Insurance

OFSTED will periodically inspect Rochdale Training. To ensure the highest standards in safeguarding matters, regular rolling audits of all aspects of safeguarding will be carried out using the Safeguarding Audit Checklist. Safeguarding Officers are to read and have regard to the separate Safeguarding Inspection document.



SAFEGUARDING INFORMATION

Local Authority Designated Officer (LADO)

The role of the LADO is set out in HM Government guidance Working Together to Safeguard Children (2018). The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against children, or related to a child
- Behaved towards a child or children in a way that indicates she/he is unsuitable
- to work with children

If you need to contact your Local Authority Designated Officer (LADO) please consult your Local Safeguarding Children Board or Local Authority:

Rochdale LADO: Louise Hurst

Email: lado@rochdale.gov.uk

Tel: 0300 3030 350

NOTE: Only contact the LADO if a Rochdale Training Safeguarding Officer is not present. In the first instance, always refer to a Rochdale Training Safeguarding Officer:

Rachel Yates: Tel: 01706 631417 ext 159
Mob: 07860 919379
Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Tel: 01706 631417 ext 155
Mob: 07377 400379
Email: safeguarding@rochdaletraining.co.uk

LOW LEVEL CONCERN POLICY

1 Policy Statement

- 1.1 The policy outlines Rochdale Training's approach to managing concerns about adults which do not meet the allegation threshold nor are considered serious enough to consider a referral to LADO.
- 1.2 For the purpose of this policy, the term "staff" will refer to any adult associated with Rochdale Training, i.e. whether working for or with Rochdale Training, engaged as a paid employee, Worker or Self-employed contractor, Volunteer or trustee.

2 Roles, Responsibilities and Implementation

- 2.1 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success. Rochdale Training is committed to safeguarding and promoting the welfare of children and young people and expects all members of staff to share this value.

3 Aims

- 3.1 To ensure that all concerns about adults can be identified and spoken about openly with the safeguarding team.
- 3.2 To ensure that all concerns about adults are recorded and dealt with appropriately.
- 3.2 To create an open and transparent culture which enables the centre to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working for or with Rochdale Training are clear about professional boundaries and act within them, in accordance with the ethos and values of Rochdale Training.

4 Definition

- 4.1 A low-level concern is any concern – no matter how small, and even if no more than a "nagging doubt" – that an adult may have acted in a manner which:
 - a) Is not consistent with Rochdale Training's Code of Conduct; and/or
 - b) Relates to their conduct outside of work which, even if not linked to a

particular act or omission has caused a sense of unease about that adult's suitability to work with children.

- 4.2 Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once the staff share what they believe to be a low-level concern that decision should be made by the Designated Safeguarding Lead (DSL) and the Chief Executive.

5 The Importance of Sharing Low-Level Concerns

- 5.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCR's), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe. All concerns, no matter how small, must be reported.

6 Reporting a Low-Level Concern

- 6.1 Any concern about a member of staff should be reported to the Designated Safeguarding Lead (DSL)
- 6.2 The reporter of the concern will remain anonymous.

7 Self-Reporting

- 7.1 Occasionally an individual might find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, an individual may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. In these instances and individual may wish to self-report and this is encouraged. This can be positive for a number of reasons:
- It enables a potentially difficult issue to be addressed at the earliest opportunity;
 - It demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and
 - It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.
- 7.2 Any individual who wishes to self-report should speak with the Designated Safeguarding Officer (SG Officer)

8 Initial Response to a Low-Level Concern

- 8.1 In the event that a low-level concern is raised, Rochdale Training will review the information to determine whether the behaviour;
- Is entirely consistent with Rochdale Training's Code of Conduct and the law;
 - Constitutes a low-level concern;
 - Is serious enough to consider a referral to the LADO; or
 - When considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies.
- 8.2 Where necessary, Rochdale Training will seek advice from the LADO (maintaining the anonymity of the individual where possible).
- 8.3 The SG Officer will speak with the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted)

9 Outcomes

The behaviour is entirely consistent with Rochdale Training's Code of Conduct

- 9.1 The individual in question will be informed by the SG Officer what was shared about their behaviour so they have an opportunity to respond. The individual in question will be informed that their behaviour is entirely consistent with Rochdale Training's Code of Conduct.
- 9.2 The DSL will also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviours is consistent with the Code of Conduct and the law.

The current concern is low-level

- 9.3 The individual in question will be informed by the DSL what was shared about their behaviour so they have an opportunity to respond.
- 9.4 The SG Officer, working with the Chief Executive will determine the most suitable response. This may include:
- A conversation with the individual about their behaviour and why it was deemed to be a low-level concern
 - Training

- Mentoring from an appropriate individual, e.g. a line manager
- Any support as identified by the individual themselves

9.5 In the event that the concern becomes a disciplinary matter, Rochdale Training's Staff Disciplinary policy will be followed.

The current concern is sufficiently serious enough to warrant a referral to the LADO or when considered with any other low-level concerns that have been shared about the same individual, should be reclassified as an allegation

9.6 In the event that the current concern should be referred to the LADO or reclassified as an allegation, the concerns regarding a staff member policy/ flow chart will be followed.

10 Records

10.1 A low-level concerns record will be kept centrally by the SG Lead

10.2 The concerns record will be kept in a chronological order as a running record. Each entry will have the time and date recorded, along with the name of the individual who has made the record and the outcome of the concern. The records will be kept confidentially and will be held securely.

10.3 If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO, the records relating to the low-level concern will be placed on the individual's personnel file.

10.4 If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the individual's personnel file.

10.5 If the low-level concern is raised about an individual who works with Rochdale Training, but is not a member of staff, e.g. agency staff/contractor, then any records relating to the concern will be shared with the individual's employer. If necessary, advice will be sought from the LADO on what can be shared and with whom.

10.7 The DSL will be responsible for recording any concerns.

MODERN SLAVERY POLICY

It is the policy of Rochdale Training to conduct all of its business in an honest, transparent and ethical manner. This includes ensuring effective systems and controls are in place to minimise the risk of modern slavery taking place in our business operations or supply chains.

Scope

This policy applies to all staff within the company who have a responsibility to raise concerns in respect of modern slavery. Staff must have a zero-tolerance attitude to modern slavery at all points within our supply chain and must refer to the Whistling Blowing Policy if they have any concerns.

Implementation

Recruitment – Using the safe recruitment process all candidates are checked that they have an entitlement to work within the UK.

Induction – All staff must follow the induction time-table which includes reading and understanding the policies of the company.

Training – All staff must comply with CPD training and on-line training to ensure an awareness of prevent/safeguarding and radicalisation training.

Implementation Points Specific to Suppliers

All sub-contractors will comply with due diligence procedures, a risk assessment report is produced for each potential sub-contractor.

All sub-contractors will have access to our policies and procedures to give a consistent approach to implementing our transparent and ethical values.

ONLINE SAFETY POLICY

Introduction

- Rochdale Training has a positive policy of equality and diversity and strives to support learners wherever possible. Rochdale Training also has a duty of care to safeguard all of its stakeholders including staff, learners and visitors and is committed to providing a safe environment for training and work.
- As part of an ongoing commitment to safeguard all of its stakeholders Rochdale Training operates a policy whereby all learners must adhere to online safety restrictions.
- Rochdale training will make every effort to ensure that learners are given every opportunity to access online content in order to study, provided it can ensure its safeguarding commitment to all learners.
- It is essential that children are safeguarded from potentially harmful and inappropriate online material. Rochdale Training supports a “whole organisation approach to online safety”.
- Computer skills are vital to access employment and life-long learning as ICT is now seen as an essential skill for life. However, technologies present risks to vulnerable groups as well as benefits. Internet use for work, home, social and leisure activities is expanding across all sectors of society. This brings staff and learners into contact with a wide variety of influences some of which may be unsuitable.
- The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation; radicalisation and sexual predation, as well as online bullying and sexual violence and harassment. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate or harmful material. 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 pressure, commercial advertising and adults posing as young 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 and online bullying.
 - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

- There are many new technologies that are enhancing communication and the sharing of information. Current and emerging technologies in Rochdale Training used both inside and outside by learners:
 - Internet websites
 - Virtual Learning Environments (including Zoom, Microsoft Teams)
 - Instant messaging
 - Social networking sites
 - Emails
 - Blogs
 - Podcasting
 - Video broadcasting sites
 - Chat rooms
 - Gaming and gambling sites
 - Music download sites
 - Mobile phones with camera and video functionality
 - Digital cameras
 - Smart phones, iPads and tablets with email and web applications.
 - Artificial intelligence (IA)

Our approach is to implement appropriate safeguards within Rochdale Training while supporting staff and learners to identify and manage risks independently, with confidence. We believe this can be achieved through a combination of security measures, training guidance and implementation of our policies.

Aims of the Policy

- To ensure that everyone who works and learns at Rochdale Training achieves their full potential safely in an environment free from discrimination.
- To have procedures that take account of an individual's right to education balanced by the risk to Rochdale Training and its wider community.
- Establish clear reporting procedures/ support for areas of concern.
- To prepare learners for the needs of today and their future working lives where the curriculum and their personal goals require them to learn how to locate, retrieve and exchange information using a variety of technologies.
- To provide guidance on the safe and acceptable use of online technologies including social media communications, by learners inside and outside of Rochdale Training.
- Help safeguarding and senior leadership teams have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring).

Roles and Responsibilities

There are clear lines of responsibility for Online Safety within Rochdale Training. All members of Rochdale Training are responsible for ensuring the Online Safety of themselves and others.

Concerns should be reported immediately to a member of the safeguarding team. When informed about an incident staff should take care not to guarantee confidentiality towards the individual that reported it or those involved.

- Safeguarding officers and lead safeguarding officers are responsible for attending relevant training. They will be expected to lead the Online Safety review process (including filtering and monitoring), provide updates to the Online Safety Policy when required, deliver staff development/training, record incidents and liaise with the local authority and external agencies to promote Online Safety within Rochdale Training. The safeguarding team will complete an annual review of “digital safeguarding” and make improvements based on the research.

- Learners are responsible for using Rochdale Training’s IT systems and mobile devices in accordance with our acceptable usage policy and mobile and smart technology policy.

Learners must act safely and responsibly at all times when using the internet and/or mobile technologies both in learning and social contexts, in adherence with the above policies.

They must follow the reporting procedures where they are worried, concerned or where they believe an Online Safety incident has taken place involving them or another member of Rochdale Training.

Learners must complete the “Life Online Initial Assessment” so that Rochdale Training can provide support as required and they must also complete the “Online Safety” module in the mandatory safeguarding curriculum.

- All staff are expected to be vigilant with regard to Online Safety and complete mandatory training as required.

It is vital that all staff members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on current/ potential issues.

Teaching staff and tutors are expected to teach, guide and support learners to develop Online Safety skills, providing a model example to learners through embedded good practice with regard to topics including, though not limited to, cyber-bulling, sexting and online grooming.

Staff will monitor what learners are doing online and guide and support learners whilst working online.

Digital communication with students must be professional at all times and in the main restricted to Rochdale Training’s systems/networks.

Teaching staff are encouraged to utilise technology to aid their teaching and working practices. They are responsible for ensuring the high standards of professionalism laid out in this policy and its associated acceptable use policies are maintained.

External platforms not hosted by Rochdale Training such as social media sites should not be used for individual friendships with learners except in exceptional circumstances where a pre-existing relationship already exists. Any breach by a member of staff of this policy that brings Rochdale Training into disrepute will be dealt with via the Staff Disciplinary Policy and Procedure.

Scope of Policy

- This policy applies to all staff and learners, irrespective of their age, method of application or enrolment or their type of study including those on further education, higher education and apprenticeship programmes, studying either full-time or part-time. This policy applies regardless of whether IT systems and/or the internet are accessed on our premises or remotely.
- The policy also applies to use of social media and other communication platforms inside and outside of Rochdale Training, including the loan of a laptop.
- This online safety policy should be read alongside other relevant policies including:
 - Safeguarding Children and Adults Policies
 - Preventing Radicalisation Policy
 - Staff and Learner Acceptable Usage Policies
 - Remote Learning Policy
 - Anti-Cyber Bullying Policy
 - Use of IT Facilities and Access Control Policy
 - Mobile and Smart Technology Policy

Online Safety

- Rochdale Training has an Online Safety Policy to protect learners, staff and visitors. The policy recognises that Online Safety encompasses not only the internet but any type of electronic communication, such as mobile phones and devices with wireless technology, as well as new and emerging technology such as AI.
- It is important for all learners to understand the internet is an unmanaged, open communications channel. Anyone can send messages, discuss ideas and publish material with no restriction. These features of the internet make it an invaluable resource used by millions of people every day – however not all information is correct, accurate or valid.
- Learners should be aware that publishing personal information could compromise their security and that of others.
- Rochdale Training will continually make it clear to all learners, staff and visitors that the use of our equipment for inappropriate reasons is unacceptable. Rochdale Training will take reasonable actions and measures to protect all its users, including (although not limited to) disciplinary action.

Bullying

Online bullying should be treated like any other form of bullying and Rochdale Training's anti-cyber bullying policy should be followed for online bullying, which may also be referred to as cyberbullying. It is important not to treat online bullying separately to offline bullying and to recognise that much bullying will often have both online and offline elements.

Sexual Violence and Harassment

Many children now have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This means that some learners whilst at Rochdale Training

may use this facility to sexually harass their peers via their mobile and smart technology, share indecent images; consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Rochdale Training are committed in ensuring this is appropriately managed (see mobile and smart technology policy).

Any incident of sexual harassment or violence (online or offline) should be reported to Rachel Yates (DSL) who will follow the full guidance. Staff should work to foster a zero-tolerance culture. The guidance stresses that schools/colleges/training providers must take all forms of sexual violence and harassment seriously. All accusations and cases of sexual violence and harassment (online and not) will be treated seriously and not allowed to perpetuate.

Misuse of Rochdale Training (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern learner and staff use of Rochdale Training's networks, connections, internet connectivity and devices, cloud platforms and social media (both when on site and outside of Rochdale Training).

These are defined in the relevant Acceptable Use Policies for staff and learners as well as the remote learning policy.

Radicalisation

- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Learners must report to any member of staff if they view any extremist or radical views expressed online. Staff should report any concerns immediately to a member of the safeguarding team.
- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

Child Sexual Exploitation

- Child Sexual Exploitation (**CSE**) may involve utilising the internet and social media to identify potential victims or as a tool to coerce and blackmail children into performing sexual acts, both on and offline.
- Means of accessing the internet may also be provided to children as a "gift" by perpetrators such as in the form of new mobile phones and devices. In some cases, CSE can take place entirely online such as children and young people being coerced into performing sexual acts via webcam/social media and therefore may not always result in a physical meeting between children and the offender.

Youth Produced Sexual Imagery and Sharing of Inappropriate Imagery

- Youth Produced Sexual Imagery (**YPSI – formerly known as 'sexting'**) can be defined as 'an increasingly common activity among children and young people, where they share inappropriate or explicit images online'.
- Although viewed by many young people as a 'normal' or 'mundane' activity and part of 'flirting', YPSI can be seen as harmless; but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend
 - Share an explicit image or video of a child, even if it's shared between children of the same age
 - Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.
 - It is important to note that if one of the parties is over 18, this is no longer sexting, but child sexual abuse.
- See appendix 2 Sharing nudes and semi-nudes for guidance on how to respond to an incident of this nature.
 - It is important to note that if one of the parties is over the age of 18, this is no longer classified as sexting but child sexual abuse.

Social Media

- Social media is a useful tool; Rochdale Training understands that learners communicate and collaborate via sites and apps on a regular basis and it is to be noted that there are merits to this. Learners should familiarise themselves with and adhere to guidelines and etiquette as found in Appendix 1 of this document and refer back to their acceptable usage policy.
- Unfortunately, there are also risks attached to the use of social media; everyone at Rochdale Training is expected to use it responsibly, inside and outside of our premises. **Learners must** immediately tell their tutor or safeguarding officer if they receive offensive or inappropriate messages whilst they are a learner at Rochdale Training.

Trends over the previous twelve months

Artificial Intelligence (AI)

Self-generative artificial intelligence has been a significant change over the past 12 months. Staff and learners are finding that they have access to tools that generate text and images at home and at Rochdale Training. AI has its benefits in enhancing the curriculum and learning experience. However, AI represents a challenge not only in terms of accuracy when people are genuinely looking for information, but also in terms of plagiarism and above all safety. Rochdale Training will take the approach of educating users about the benefits and drawbacks of using AI.

Children and Parents: Media Use and Attitudes Report 2023

The above report has shown that YouTube remains the most used site or app among all under 18's and the use of WhatsApp, TikTok and Snapchat has continued to increase. Rochdale Training recognise that many of our children and adults in need are on these apps and will continue to educate users on how to use these apps safely.

The 2023 Revealing-Reality: Anti-social-Media Report

The above report highlights that more children and young people are using Snapchat as their main source of news, information and communication. The platform can contain highly, regular exposure to disturbing, graphic and illegal content such as fights, attacks, sexual acts and weapons. At the same time, the Children's Commissioner revealed that all young

children are regularly consuming pornography and living out inappropriate behaviour and relationships due to 'learning from' pornography. This has coincided with the rise of misogynistic influencers such as Andrew Tate, which has a significant influence on many young boys over the past year.

Increase in the Number of 'Unknown Friends' on Social Media Accounts

An area of concern for Rochdale Training looks at the number of 'unknown friends' learners have on their accounts. This links directly with an increase in the number of fake accounts being created to shame, bully/harass, or intimidate people. Further preventative work will continue to educate learners of the dangers of this and how to remain vigilant whilst becoming digitally resilient.

Accessing the Internet on Rochdale Training's premises: Monitoring & Filtering

- The internet is available on all Rochdale Training's systems to help learners with their studies. Whilst it is essential that appropriate filters and monitoring processes are in place, Rochdale Training recognises that 'over blocking' does not lead to reasonable restrictions and does not replace what young people are taught with regards to online safety and safeguarding, Rochdale Training aim to block harmful content without teaching and learning being impacted. **Learners must** immediately tell a tutor or safeguarding officer if they think their network account has been tampered with.
- All the websites visited, and unencrypted online content are automatically logged by internet monitoring software including Sophos, Watch Guard, Cisco Meraki and Barracuda. These software filters use advanced techniques such as URL Reputation and Automatic Image Recognition technology.
- Barracuda may block access to some sites; if such a site is related to a learner's normal working requirement please contact the ICT helpdesk to arrange for the site to be reviewed and unblocked (where permissible) and added to the "white list".
- Cisco Meraki blocks mobile devices (including bring your own device) from accessing content deemed harmful or inappropriate. This content has been agreed with the Safeguarding team, IT Lead and SLT.
- Uploading and/or circulation of derogatory or defamatory comments and/or images about Rochdale Training and/or its staff and/or learners to any internet service (websites, social media, etc) are not permitted. Abuse of the internet facilities will be seen as improper use of Rochdale Training's equipment and will lead to disciplinary procedures (see Appendix 1).
- Rochdale Training has implemented content filters to prohibit access to the categories listed below. Any student found attempting to access inappropriate or harmful material will be subject to Rochdale Training's conduct procedures and appropriate support will be arranged. This list is updated regularly:
 - Discrimination: promotes the unjust or prejudicial treatment of people on the ground of race, religion, age, or sex.
 - Drugs/Substance abuse: displays or promotes the illegal use of drugs or substances.
 - Extremism: promotes terrorism and terrorist ideologies, violence, or intolerance.

- Malware/Hacking promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content.
 - Pornography: displays sexual acts or explicit images
 - Piracy and copyright theft: include illegal provision of copyrighted material.
 - Self-Harm: promotes or displays deliberate self-harm (including suicide and eating disorders)
 - Violence: displays or promotes the use of physical force intended to hurt or kill
- Overall responsibility for filtering and monitoring will sit with the safeguarding lead with further SLT support from Lee Shackleton – ICT Lead. However, all staff have a role to play and should report.
 - At Rochdale Training web filtering is provided by Sophos and Barracuda. The same systems filter content on devices that are taken home. Rochdale Training impose the same restrictions on devices that are taken home.
 - Changes to monitoring and filtering settings can be made by Lee Shackleton – ICT Lead in conjunction with Rachel Yates – Safeguarding Lead.
 - Technical support and advice, setup and configuration are from CNT.
 - Regular checks on the effectiveness and suitability of our filtering and monitoring systems will take place. A weekly report from Barracuda of blocked content will be sent to the Safeguarding team for review and a monthly audit of the effectiveness of our filtering systems will take place.
 - An annual review of filtering and monitoring will take place as part of the online safety audit.

Data Protection

Rochdale Training will comply with the Data Protection Act 2018 and GDPR by ensuring that personal data is:

- Collected and processed lawfully, fairly and transparently for only specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, updated and relevant and not excessive for the purposes it was collected.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Including not being transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

Confidentiality

- The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR) the General Data Protection Regulation (GDPR) replaced the Data Protection Act 1998 in the UK. It is a part of the wider package of reform to the data protection landscape that includes the Data Protection Bill. The GDPR sets out requirements for how organisations will need to handle personal data from 25 May 2018.
- These are not only restrictions on disclosure of information about Rochdale Training; they are bound by a common law duty of confidentiality. This duty prevents Rochdale Training from releasing information about staff and learners, without their consent.
- Information which must be treated as confidential includes the names and addresses of employees and learners and any other information about them which is not publicly known aka "personal data". Accordingly, to ensure that we do not breach our duty, no information, even if it only exists in printed form, should be disclosed unless all the relevant procedures have been followed.
- Since 1 January 2005 people have the right, under the Freedom of Information Act 2000, to request information held by a public authority which has not already made available through its publication scheme. Please see the Freedom of Information Act Policy for more information.

Raising Awareness

- Online safety awareness is delivered throughout the year, to all learners in a range of ways including through pastoral sessions which focus on Online Reputation, Exploitation, Online Gaming and Keeping Safe Online. Targeted events such as 'Safer Internet Week' are promoted across Rochdale Training as a way of raising awareness and providing advice and guidance to both learners and staff.
- Learners can access advice in regard to their online safety settings by speaking to one of the safeguarding team.
- Regular training is provided for all staff in regard to online safety, safeguarding, sexual and criminal exploitation and radicalisation.

Incidents and Response

When an online safety incident is reported to Rochdale Training this matter will be dealt with very seriously. Rochdale Training will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring.

If a learner wishes to report an incident, they can do so in confidence via safeguarding@rochdaletraining.co.uk, to their tutor/assessor or directly to one of the safeguarding officers.

Where a member of staff wishes to report an incident, they must contact their line manager or one of the safeguarding officers. Alternatively, they may also use the safeguarding@rochdaletraining.co.uk link.

Following any incident, Rochdale Training will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place; external agencies may be involved, or the matter may be resolved internally depending on the seriousness of the incident. Serious incidents will be dealt with by senior management, in consultation with appropriate external agencies.

Relevant Sources of Information

- Relevant documents include:
 - DfES ‘Keeping Children Safe in Education’ (September 2023)
 - Working Together to Safeguard Children – a guide to inter-agency working to safeguard and promote the welfare of children (July 2018)
 - HM Government ‘Prevent Duty Guidance: for further education institutions in England and Wales (2015)
 - DfES ‘Sexual Violence and Sexual Harassment between children in schools/colleges
- Useful websites include:
 - Child Exploitation and Online Protection Centre <http://www.ceop.police.uk/>
 - UK Safer Internet Centre <http://www.saferinternet.org.uk/>
 - CEOP’s Think You Know <http://www.thinkuknow.co.uk>
 - Safer Internet Centre Social Network Checklists www.saferinternet.org.uk/checklists
 - Get It Right From a Genuine Site <http://www.getitrightfromagenuinesite.org/>
 - Net Aware <http://www.netaware.org.uk/>
 - Internet Watch Foundation <http://www.iwf.org.uk/>

Appendix 1

We must all adhere to the following guidelines when accessing social media sites and apps:

- Use of sexually explicit language or viewing, creating, or sharing of sexually explicit imagery is not permitted nor advised from a safeguarding perspective.
- Verbally abusive, intolerant, or threatening language is strictly prohibited.
- Use of racist or extremist language which would directly contravene British and our College values, is not permitted.
- Use of social media for radicalisation or the expression of extremist views is not permitted.
- Communication with staff unless on a college-controlled platform is not permitted. Any such communication instigated by staff member to a learner’s personal social media must be reported to safeguarding team.

Please be mindful of the following when using social media:

- Avoid posting anything on social media that you wouldn’t want others to see. Remember what you post could impact on your future career.

- Don't be pressured into doing anything inappropriate on social media like posting photos or videos. **You must** report any requests you receive through social media to post sexually explicit images or offensive images online, to your tutor or safeguarding staff.
- Beware of accepting people as friends or engaging in conversations on social media if you don't know the people you are communicating with.
- Exercise caution when accessing personal social media platforms in a public environment, e.g., a classroom or library.
- Set any personal social media profiles to "private" to ensure control over who is able to access/view your information.
- Ensure your behaviour online cannot be conceived as detrimental to Rochdale Training or its reputation.
- Be security conscious and take steps to protect you from identity theft, this can be achieved by restricting the amount of personal information given out on social media platforms. These platforms allow people to post detailed personal information such as date of birth, place of birth and favourite football team. These are often the answers to security questions and parts of passwords.
- Change your social media password often. The ICT helpdesk or LLC can provide advice concerning password security if required.

CHILD ON CHILD ABUSE POLICY

Purpose of Policy

In recent years there has been growing recognition that children can suffer significant harm and abuse at the hands of other children or young people. All children are capable of abusing their peers. This can take a variety of forms including:

- Bullying or cyber-bullying
- Sexual violence and harassment
- Physical abuse
- Sexting
- Up skirting
- Initiation/hazing type violence and rituals

Keeping Children Safe in Education September 2023 makes clear that all staff should be aware that safeguarding and child protection issues can also ‘manifest themselves via child-on-child abuse’. Staff should recognise that children are capable of abusing their peers and this can happen both inside and outside of Rochdale Training. All staff should be clear about Rochdale Training’s Policy and Procedures regarding child-on-child abuse. It is believed that girls and young women are more likely to be the victims and boys and young men are more likely to be the perpetrators. It is also useful to note that black and minority ethnic children are often under-identified as victims and are over-identified as perpetrators. However, this is not to say that this is the only form of child-on-child abuse that will occur. All child-on-child abuse is unacceptable and will be taken seriously.

Introduction

Rochdale Training is committed to the prevention, early identification and appropriate management of child-on-child abuse. This policy applies to all board members, senior management team, staff and volunteers. Rochdale Training support a whole organisation approach to child-on-child abuse.

This policy uses the term “learner” as a means to adapt a wider interpretation of our safeguarding responsibilities so that they apply to all learners regardless of age. Although Rochdale Training’s response to child-on-child abuse should be the same for all learners, regardless of age, there may be some additional considerations in relation to learners aged 18 or over in terms of how local agencies respond.

All staff should understand that even if there are no reports of child-on-child abuse at Rochdale Training it does not mean that it is not happening, it may be the case that it is just not being reported.

Scope

The following document:

- Defines child on child abuse.
- Reflects on the different forms of child-on-child abuse.
- Outlines procedures to minimise the risk of child-on-child abuse.
- Outlines how allegations and disclosures of child-on-child abuse will be investigated and dealt with
- Outlines how victims of child-on-child abuse will be supported.

Definitions and Forms of Child-on-Child Abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by Rochdale Training's behavioural and disciplinary systems. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse; unkindness, physical fighting and harassment between children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard child on child behaviour as abusive if harm is caused because:

- There is a significant **power imbalance** between the young people concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of child-on-child abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth and so on.
- The perpetrator **repeatedly** tried to harm one or more other children.
- There are concerns about the **intention** of the alleged perpetrator. If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not.

Different forms of abuse are well documented in Rochdale Training's **Safeguarding Children and Adults Policies**. These include physical, emotional, sexual abuse, financial, coercive control and neglect. In the context of child-on-child abuse examples include:

- Teenage relationship abuse (abuse physical and emotional)
- Domestic violence
- Sexual touching/harassment, sexual violence or assault including up skirting and causing someone to engage in sexual activity without consent.
- Initiation/hazing type violence and rituals
- Sexting (also known as youth produced sexual imagery) both consensual and non-consensual.
- Prejudiced behaviours such as sexism, racism and social marginalisation
- Bullying, including cyber-bullying.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Issues surrounding Honour Based Violence (HBV), Forced Marriage and Radicalisation may also be relevant where coercion or power imbalances are involved between peers. It is also important to recognise that peer on peer abuse may well involve learners at Rochdale Training and young persons and children in other contexts, thus making a full range of abuse types possible.

Prevention:

In the broadest sense, it is hoped that Rochdale Training's Pastoral and Vocational Curriculums create and sustain an environment that helps to minimise the risk and occurrence of child-on-child abuse.

Rochdale Training also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and learners. Opportunities are sought to give teaching and learning opportunities to our learners.

Rochdale Training believes that other underpinning preventive learning about issues, such as consent, healthy relationships, online safety, recognising abusive and coercive behaviour, may help to support learning about abuse.

Rochdale Training staff will challenge any attitudes/behaviours that are inappropriate between peers (both inside and outside the classroom) and not downplay these behaviours as “banter” “part of growing up” or just “having a laugh”.

All learners should be aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. Listed below are options for learners to find help and support if they feel they are being abused or that one of their peers is at risk from abuse or child on child abuse.

- Tutors – contactable daily
- Any member of the safeguarding team
- Parents/siblings
- External agencies such as ChildLine 0800 1111, Samaritans and www.childnet-int.org

How can a child who is being abused by their peers be identified?

All staff should be alert to the well-being of learners and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

1. Failing to attend lessons, disengaging from their course or struggling to carry out tasks to the standard ordinarily expected.
2. Physical injuries.
3. Experiencing difficulties with mental health and/or emotional wellbeing.
4. Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much.
5. Broader changes in behaviour including alcohol or substance misuse.
6. Changes in appearance and/or starting to act in a way that is not appropriate for the child’s age.
7. Abuse behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. Where a learner exhibits any behaviour that is out of character or abnormal for them, staff should always consider whether an underlying concern is contributing to this.

Procedures Adopted when a Disclosure of Child-on-Child Abuse is made:

The following general principles and guidelines should be followed:

Initial response

- Any direct disclosure by a learner of an incident of abuse should be taken very seriously and managed sensitively. Basic principles of listening sensitively, providing reassurance, not asking leading questions and not guaranteeing confidentiality should be remembered.
- All incidents should be responded to in line with the Safeguarding Children and Adults Policies.
- Any incident should be referred to the DSL without delay.
- The DSL should meet with any staff involved and there should be subsequent interviews with the young people involved if appropriate.

Investigation

- The DSL will decide if further information is required to decide on the best response.
- In incidents that involve young people not at Rochdale Training, the DSL will decide if there is a need to contact another school, college, setting or individual.
- A learner against whom an allegation of abuse has been made such that there is a 'reasonable cause to suspect that a child is suffering or likely to suffer, significant harm' may be suspended from Rochdale Training during the investigation.
- When necessary, the DSL will take advice from Children's Social Care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all learners involved including the learner or learners accused of abuse.
- If a learner against whom an allegation of abuse has been made is required to be interviewed by the police, then the learner will be supported during the interview by an appropriate adult.

Risk Assessment and Referral

- The DSL will assess the risk presented by the incident to the learner/learners involved and will decide whether a referral to the police or Local Area Designated Officer is required or whether to proceed using Rochdale Training's pastoral support and disciplinary system or, if required, Early Help from support services is required.
- Parents of children should be informed at an early stage and involve them in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of serious harm a referral should be made to Children's social Care.

Recording Process and Outcomes

- Notes should be made of all conversations and meetings to do with any incident of peer-on-peer abuse. Formal written records should be completed immediately or within 24 hours. Records should include date, time, place, persons involved, nature of disclosure and any relevant details. These should be given to the DSL immediately records of all safeguarding concerns are kept by the DSL.
- Rochdale Training will offer ongoing support in the best interests of the learners in our care and action may need to be co-ordinated where there is a wider investigation involving Children's Social Care and/or the Police.

Rochdale Training recognises that sexual violence and sexual harassment can take place between children, and within peer groups. While the focus must be a proactive education and support, such that such behaviour is minimised, Rochdale Training is also committed to responding appropriately and quickly to reports of sexual violence and sexual harassment.

At all times Rochdale Training's response will be underpinned by the principle that we have zero tolerance to abuse. Sexual violence and sexual harassment (and any other form of abuse) is never acceptable and will not be tolerated.

PHOTO PERMISSIONS FORM

Learner Name:	
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Permission for taking, holding and using images

I confirm I give permission for an image of myself to be taken, and:	
1. Held on file for identification purposes.	<input type="checkbox"/>
2. Used in publicity materials by Rochdale Training.	<input type="checkbox"/>
3. Both (1) and (2) above	<input type="checkbox"/>
OR	

I confirm I give permission for video to be taken as evidence for my portfolio, and	
1. Held on file for verification purposes.	<input type="checkbox"/>
Once the file has been verified, the video will be destroyed from Rochdale Training's system	

LEARNER PERMISSION <i>confirm</i>	<i>Please tick box to agreement and sign below</i>	<input type="checkbox"/>
Signature: _____		

PARENT/GUARDIAN PERMISSION <i>confirm</i> <i>(required for under 18s)</i> <i>below</i>	<i>Please tick box to agreement and sign</i>	<input type="checkbox"/>
Signature: _____		

EMPLOYER PERMISSION	<i>Please tick box to confirm agreement and sign below</i>	<input type="checkbox"/>
I consent to Rochdale Training using our company logo, in conjunction with the learner's photo, in marketing material and social media to promote the benefits of undertaking an apprenticeship.		
Signature: _____		

TUTOR SIGNATURE:	DATE:

Guidelines

The following are guidelines on how to use the form, but at all times bear in mind common sense. e.g. - if photographing a field and someone happens to be walking across this, but their face cannot be seen it may not be necessary to complete a form.

Inform people.

- Context of the image
- Intended use of image

Taking photos

- Written permission is required from all persons in the photograph.
- If people are identifiable (even if in a large street scene for example) permission is required from all persons
- Inform group/individual images will be used in context.
- Ensure a consent form has been signed.
- If a specific house/property is being identified permission from the owner must be sought.
- Permission must be sought from a parent and/or carer and a consent form must be signed for learners under the age of 18.

PREVENT QUESTIONS AND ANSWERS

The questions below are what we ask our learners about 'Prevent' during reviews. The questions are to be used as a discussion tool to:

- Develop learners' understanding and commitment to the Prevent Agenda
- Remind them about their rights and responsibilities.
- Promote good practice.

This is a discussion document, and any suggestions would be welcomed.

The questions will need to be reviewed yearly to reflect the latest changes in legislation and society.

1. What is the Prevent Strategy, why was it introduced?

Prevent is a government strategy designed to stop people becoming terrorists or supporting terrorist or extremist causes.

The Prevent strategy covers all types of terrorism and extremism, including the extreme right wing, violent Islamist groups and other causes.

2. Do you know who the Channel Panel are? What is their role?

The Channel Panel partners include ministers of the Crown and government departments; Local government; Criminal justice; Education, childcare etc; Health and social care; and the Police.

The Channel Programme is a key element of the Prevent strategy. It is a multi-agency safeguarding approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

3. What do you understand by the term radicalisation?

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Individuals can be drawn into the process of radicalisation in a number of ways. Vulnerability means individuals who, because of their circumstance, experiences or state of mind can be led towards a terrorist ideology.

4. What do you understand by the term Extremism?

Extremism means, literally, "the quality or state of being extreme" or "the advocacy of extreme measures or views".

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist."

5. What are the signs of Radicalisation?

Common signs of radicalisation: Although not uncommon amongst young people in general, common signs are:

- Resentment to authority figures
- Difficult and moody behaviour
- A preference for their own company
- A desire to be alone

Less common signs of radicalisation

- Being increasingly secretive with online activities
- Expressing feelings of an 'us and them' mentality
- Becoming argumentative and domineering in their viewpoints
- Ignoring views that contradict their own
- Losing interest in activities and friends they used to enjoy spending time with
- Downloading extremist content and seeking those that have extremist views
- Making travelling plans

6. Do you think people are likely to get radicalised online?

The internet has transformed the way that terrorist organisations can influence and radicalise people. It enables groups such as ISIL to reach a larger global audience, with broader and dynamic messages. This means that vulnerable people can easily be exposed to extremist materials that are easily accessible online and radicalised by extremist views.

A national survey of 11-24-year olds conducted by the National Counter Terrorism Policing HQ highlights that many young people obtain information from Google and social media sites including Facebook, Instagram and Twitter.

The police are active in tackling online radicalisation and many extremist websites are removed by the Counter Terrorism Internet Referral Unit (CTIRU). The internet provides a discreet opportunity for extremists to target young, vulnerable individuals within their own homes which means the work of the CTIRU is crucially important in the fight against terrorism.

7. How can you protect yourself from online radicalisation?

- Ensure you know who you are talking to
- Check the sites you are accessing
- Be vigilant
- Report online material promoting radicalisation

8. What would you do if you suspected someone is being radicalised?

Trust your judgement. Do not ignore your gut feeling. If your judgement is telling you that they may be at risk – do something about it. Tell your Safeguarding Officer.

We understand you may be reticent, worried about making what some could interpret as 'unfounded accusations', however, reporting your concerns is important for everyone's safety.

9. Do terrorists come from all religious backgrounds?

The world's great religions all have both peaceful and violent messages from which

believers can choose. Religious terrorists and violent extremists share the decision to interpret religion to justify violence, whether they are Buddhist, Christian, Hindu, Jewish, Muslim, or Sikh.

Not all terrorists come from impoverished or disadvantaged backgrounds. Disadvantaged environments are more likely to produce sympathisers than terrorists. Not all terrorists are religious fanatics, and many belong to secular groups.

10. Are white supremacists' extremists?

White supremacy or white supremacism is the racist belief that white people are superior to people of other races and therefore should be dominant over them.

Like most similar movements such as neo-Nazism, white supremacists typically oppose members of other races as well as Jews.

11. Do convicted terrorists live in Manchester?

Hundreds of terrorists have been freed from prison over the past decade, with many allowed to return to the communities where they were radicalised.

12. If you commit a terrorist act in another country, can you be prosecuted in the UK?

Terrorism offences are distinct from other types of crime in that individuals who commit terrorism-related offences have political, religious racial and/or ideological motivations, unlike typical criminal motivations, which may be personal gain or revenge.

Terrorism crimes and terrorist-related offences are subject to the criminal justice system in the same way as all other crimes. The CPS reviews the case and makes a charging decision in line with the Code for Crown Prosecutors.

13. Is giving money to terrorists against the law?

Serious and organised crime costs Britain at least £24 billion every year, and recent attacks demonstrate the importance of a strong toolkit to prevent terrorist atrocities.

Businesses such as banks, estate agents, accountants and payment firms carry out stringent and targeted checks to make sure that money changing hands is from a legitimate source and will not be used to fund terror acts.

Although the vast majority of businesses are vigilant, these rules will ensure that they are not abused by criminals or terrorists looking to move funds or obscure assets.

The rules will improve the quality of the checks. They ensure that businesses can spot suspicious activity and report it, enabling the police to act swiftly and decisively to prevent corruption or terrorist attacks.

14. What do you know about Run, Hide, Tell?

Firearms and weapons attacks are very rare, having a plan and being conscious of your surroundings when out and about will help you stay safe and could save your life.

The **Run, Hide, Tell** advice highlights the importance of people who are caught up in a firearms or weapons attack, wherever possible, assisting those around them who may need help to move away from danger e.g. someone who is deaf or hard of hearing may be unable to tell where a source of a gunshot may be coming from so may be unsure in

which direction to go.

15. What is grooming?

Grooming is when someone builds a relationship, trust and emotional connection with another person so they can manipulate or exploit them.

PREVENTING RADICALISATION POLICY

Background

This 'Preventing Radicalisation Policy' is part of our commitment to keeping learners safe. Over the last few years, global events have led to a growth of extremist viewpoints, including advocacy of violent extremism.

We have an important part to play in both educating learners and young people about extremism and recognising when learners start to become radicalised. In March 2015, new statutory duties were placed on organisations by the Counter Terrorism and Security Act (2015) which means they must work to prevent learners being drawn into extremism.

Safeguarding learners from all risks of harm is an important part of our work and protecting them from extremism is one aspect of that, this includes both violent and non-violent extremism.

An independent review of prevent has been carried out in early 2023 the recommendations come into effect on 31st December 2023. The review was looking at whether or not the current system was effectively tackling the root cause of extremism. The review came to the conclusion that Prevent systems need strengthening. Although there are no new legal requirements the changes provide greater clarity, practical advice and signposting to best practice – this includes the ideological causes of terrorism, managing risk and information sharing.

Islamist extremist and Extreme Right Wing are the most common forms of extremism in the UK. Of the 804 Channel cases from last year, the most common were cases referred due to:

- Extreme Right Wing radicalisation concerns – 42%
- Islamist extremism – 19%
- Conflicted ideology – 15%

Islamist Extremism – In the UK the Islamist terrorist threat comes overwhelmingly from those inspired by (but not necessarily affiliated with), Daesh and/or Al-Qa'ida.

Extreme Right-Wing Terrorism (ERWT) – Consists of Cultural Nationalism, White Nationalism and White Supremacism

- Cultural Nationalism – Belief the “Western Culture” is under threat from mass migration into Europe – rejects cultural practices such as the wearing of a burqa.
- White Nationalism - Belief that mass immigration from the “non-white world” and demographic changes poses a threat to the “white race” and “Western culture”.
- White Supremacism - Belief that the “white race” has physical and mental characteristics that makes it superior to other races.

Left Wing, Anarchist and Single-Issue Terrorism (LASIT) – Encompasses a wide range of ideologies. LASIT currently represents a significantly smaller terrorist threat to the UK than Islamist terrorism or ERWT. The majority of LASIT, related activity in the UK

has consisted of lawful protest, and where violence has been involved, it has resulted in offences related to public order.

Extreme Misogyny – Communities that promote anti-feminist and sexual beliefs. Tate falls into this category. He is a part of a wider online space called the “Manosphere”. There are four main groups within the Manosphere:

- Man’s Rights Activists (MRA’s)
- Men going their own way (MGTOW)
- Pick-Up Artists (PUAs)
- Involuntary Celibates (Incels)

Ethos

At Rochdale Training we ensure that through our vision, values, rules, diverse curriculum and teaching we promote tolerance and respect for all cultures, faiths and lifestyles. The Trustees also ensures that this ethos is reflected and implemented effectively in policy and practice and that there are effective risk assessments in place to safeguard and promote learners welfare.

We have a duty to prepare our learners for life in modern Britain and to keep them safe. We aim to build resilience and educate learners on radicalisation and the forms it can take.

Learners have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.

Statutory Duties

The duty to prevent learners and young people being radicalised is set out in the following documents

- Counter Terrorism and Security Act (2015)
- Keeping Children Safe in Education (2023)
- Prevent Duty Guidance (2015)
- Working Together to Safeguard Children (2018) and subsequent updates

Related Policies

- Use of Technology, IT Facilities and IT Access Control Policy
- Equality & Diversity Policy
- Staff Code of Conduct
- Acceptable usage policies
- Low Level Concerns Policy
- Early Help Policy

Definitions

- **Extremism** is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **British Values** are democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

- **Ideology** – The ideological component of terrorism is what sets it apart from other acts of serious violence. Ideology is a set of beliefs a person may argue in favour of or be a supporter of.

Roles and Responsibilities

Role of the Trustees

It is the role of the Trustees to ensure that Rochdale Training meets its statutory duties with regard to preventing radicalisation.

Role of the Chief Executive

It is the role of Chief Executive to:

- ensure that staff respond to preventing radicalisation on a day-to-day basis,
- ensure that the curriculum addresses the issues involved in radicalisation
- ensure that staff conduct is consistent with preventing radicalisation

Role of Designated Safeguarding Lead

It is the role of the designated safeguarding lead to:

- ensure that staff understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns
- receive safeguarding concerns about learners who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation
- make referrals to appropriate agencies with regard to concerns about radicalisation
- liaise with partners, including the local authority and the police
- report to the Trustees on these matters via the Chief Executive.

Role of staff

It is the role of staff to understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns.

Curriculum

Teaching and Learning

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- **Embedding** British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum.
- **Promoting** wider skills development such as social and emotional aspects of learning.
- **A curriculum** adapted to recognise local needs, challenge extremist narratives and promote universal rights.
- **Teaching**, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values through a specific safeguarding curriculum.
- **Use of external** programmes or groups to support learning while ensuring that the input supports our goals and values.
- **Encouraging** active citizenship and learner voice.

Internet Safety

The internet provides children and young people with access to a wide-range of content, some of which is harmful. Extremists use the internet, including social media, to share their messages. The filtering systems used at our centre block inappropriate content, including extremist content. A weekly report is produced by our IT company of blocked sites by the user and sent to the safeguarding officers for review.

We also filter out social media, such as Facebook. Searches and web addresses are monitored, and the IT lead will alert senior staff where there are concerns and prevent further access when new sites that are unblocked are found.

Where staff, learners or visitors find unblocked extremist content they must report it to a Safeguarding Officer.

We are aware that learners and young people have access to unfiltered internet when using their mobile phones and staff are alert to the need for vigilance when they are using their phones. Learners will not be permitted to access the internet using Rochdale Training's Wi-fi.

The Use of Technology, IT Facilities and IT Access Control Policy refers to preventing radicalisation and related extremist content.

Learners and staff know how to report internet content that is inappropriate or of concern.

Staff Training

Staff will be given training to help them understand the issues of radicalisation, are able to recognise the signs of susceptibility or radicalisation and know how to refer their concerns. This information also forms part of induction safeguarding training. Staff are updated as necessary in safeguarding newsletters.

Safer Recruitment

We ensure that the staff we appoint are suitable, our recruitment procedures are rigorous and we follow the statutory guidance published in part 3 of *Keeping Children Safe in Education (2023)*. DBS checks are undertaken.

Visitors

Visitors who are invited to speak to learners will be informed about our preventing extremism policy. We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to learners without a member of staff being present.

Staff must not invite speakers into Rochdale Training without first obtaining permission from the Chief Executive.

'No platform for extremists'

Rochdale Training is vigilant to the possibility that hire of the premises may be requested by people wishing to run an extremist event. The Centre does not accept bookings from individuals or organisations that are extremist in their views.

Rochdale Training aims to reduce permissive environments. We aim to limit exposure to radicalising susceptible narratives, both online and offline and to create and to create an environment where radicalising ideologies are challenged and not permitted to flourish.

Signs of Susceptibility

There are no known definitive indicators that an individual is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of susceptibility include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identify
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith
- Disability
- Suffered from abuse/neglect

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others
- being isolated
- insignia, tattoos, certain types and brands of clothes etc.

Referral Process

Staff and visitors must refer all concerns about young people and adults who show signs of vulnerability or radicalisation to the Designated Safeguarding Lead using the usual methods for reporting other safeguarding concerns.

When there are significant concerns about a learner, the Designated Safeguarding Lead in liaison with the Chief Executive will make a referral to the appropriate body.

Monitoring and Review

This policy will be monitored by the Trustees via a report from the Designated Safeguarding Lead via the Chief Executive.

It will be reviewed annually.

SAFEGUARDING PROGRAMME CHECKLIST 2023

- Welcome to new employee
- Introduction to Safeguarding Lead and Safeguarding Officers
- Discuss Job Description and involvement with children/vulnerable adults
- Issue a Guidance for Staff document and go through
- DBS check – check this has been applied for
- Home Office training
- Complete the online training: www.foundationonline.org.uk
 - British Values
 - Radicalisation and Extremism
 - Staying Safe Online
 - Who Can you Trust
- Safeguarding in the FE and Training Sector (code: C1145) ETF website training
- Issue keeping children safe in education 2023 and go through as well as:
 - Safeguarding Children and Adults Policy and procedures
 - Anti-Harassment and Bullying Policy
 - Code of Conduct (Staff)
- Discuss Safeguarding responsibilities and issue SG cards
- Safeguarding overview to include
 - RTA's whole organisation approach
 - Safeguarding v Welfare
 - Potential SG issues/signs
 - Who is most vulnerable
 - Radicalisation, County lines
 - Sexual Harassment/violence
- Early Help
- Low level concerns policy
- Online safety – online safety policies and procedures including filtering and monitoring
- Remote learning and SG considerations
- Acceptable usage policy for staff
- Reporting of concerns and referral form
- Resources on Onefile including SG curriculum and pastoral care
- Sexual Violence and Harassment
- Child on Child abuse
- Safeguarding training requirements

Signature on completion: _____ (employee)

Date: _____

PROTOCOLS FOR TEACHING & LEARNING ONLINE

The Protocols for teaching and learning online covers actions to take in:

1. Online 1-2-1 teaching and learning.
2. Online group teaching and learning.
3. All online teaching and learning situations.

Practice in any online session likely to combine elements of all three.

1. 1-2-1 Online Teaching

- Have a clear justification for holding a 1-2-1 session.
- Run a risk assessment to determine if the session can be justified and act on the mitigations of risk identified. If possible, use/adapt an organisation risk assessment covering all online 1-2-1 teaching and learning.
- Ensure that a 1-2-1 session is held only at the time and on the date agreed in advance with the learner.
- Internal and end of session check-ins with the learner to include a question about how they are, a reminder that they can raise safeguarding issues with a tutor or DSO and reminder that a Signal for Help is agreed.
- Remain watchful for the use of a Signal for Help.
- Respond to the use of a Signal for Help in the agreed way.
- Remind learner about any agreed microphone, camera on/off agreements and ground rules.
- If at any time during a 1-2-1 session the tutor feels uncomfortable with something said or done, they should consider ending the session and always report concerns to the Line Manager or Safeguarding Officer without delay.
- Record the session and save it to the agreed corporate location – cross refer to privacy/GDPR policies.

When a learner is a child or adult in need, or has additional learning needs:

- Gain parental/carers permission for the session to be held, ahead of time.
- Agree protocols with parents/carers, ahead of time.

2. Online Group Teaching and Learning

- Run a risk assessment and, if possible, use/adapt an organisational risk assessment covering all online group teaching and learning. Act on the mitigations of the risk identified.
- Initial and end of session check-ins with the group to include a question about how they are, a reminder that they can raise safeguarding issues with the tutor or DSO and reminder that a Signal for Help is agreed.
- Remain watchful for the use of a Signal for Help.
- Respond to the use of a Signal for Help in the agreed way.
- Remind learner about any agreed microphone, camera on/off agreements and ground rules.
- Be watchful for breaches of these agreements and decide whether they are an indication of a learner in danger.
- Be watchful for signs and indicators of abuse, neglect or radicalisation.
- If the tutor forms a concern about a learner during a session, consider moving the learner into an online breakout room in which to learn more about their situation.

- Consider if the session should be recorded and act, accordingly, informed by risk assessment.

3. All Online Teaching and Learning Situations

- Conduct teaching from a neutral room/background (use corporate background if possible) and remove all personal items from view.
- Staff to position themselves away from partners, children and pets, if possible, to be alone in a room.
- Learners to be encouraged to place themselves in as neutral and quiet/private location as possible and to avoid bedrooms if possible.
- Staff and learners to dress appropriately and use appropriate language.
- Staff to ensure they have up to date contact details for all learners in the group, line managers and DSOs.
- Staff to avoid wearing stripes or heavy patterns.
- Staff to test audio and video prior to the session beginning.
- Staff to have, or to have scheduled, up to date safeguarding training, including training about safeguarding online.
- Staff and learners not to eat or drink during sessions except for water/soft drinks.
- Staff to avoid multi-tasking while teaching.
- Staff to look into the camera when teaching – rather than at screen images of individual learners.

REMOTE LEARNING POLICY

Policy Statement

Rochdale Training is primarily a face-to-face learning provider. However, we do recognise that sometimes online learning can be more suitable for a period of time. This policy relates to the use of online audio-visual facilities to conduct sessions (remote learning). This was introduced as a direct response to the Coronavirus (COVID-19) pandemic, however we have now adopted a blended learning approach.

Rochdale Training will commence using audio-visual facilities to stream classes live to students with the aim of continuing this remote learning provision during any future lockdowns and for learners unable to attend due to unforeseen circumstances. It will also continue as part of Rochdale Training's blended learning approach.

Rochdale Training has a duty of care to deliver the best quality education the provider can reasonably deliver under these conditions and believes that an online audio-visual communication tool for learning is necessary to deliver high-quality sessions. However, in offering such provision we take very seriously the need to maintain the highest standards of safeguarding and risk management.

Therefore, to conduct online audio-visual sessions all staff and students must comply with the following:

1. All tutors and learners must adhere to Rochdale Training's ICT 'Acceptable Use Policy' and Rochdale Training's protocol for 1-to-1 and group sessions.
2. All sessions must be carried out during the normal timetable, no sessions outside of normal working hours unless agreed with the line manager.
3. If the learner is a child under the age of 18 or an adult in need, then a permission form MUST be completed prior to the 1-to-1 session commencing.
4. Tutors will update OneFile to register student attendance and send out individual teaching and learning plans on OneFile with relevant resources.
5. Sessions will be conducted using MS Teams/ Zoom- teachers may choose to use a number of additional tools to support learners.
6. Sessions will be by invitation via e-mail/ calendar. Only teachers will initiate and close sessions.
7. The recording of sessions, unless agreed to by all learners, is not permitted. However, all 1-to-1 sessions MUST be recorded for Safeguarding purposes.
8. Sessions should be conducted as though they were taking place at the provider premises: students and staff are expected to maintain professional teaching standards, behaviour, attendance, and attire.
9. Rochdale Training lanyards must be worn, and visible and dress code maintained in line with expectations for both students and staff at all times during the sessions.
10. Teachers must ensure they conduct their audio-visual sessions from a suitable environment and take into consideration what background may appear in the video.

No one else should be in the room whilst the lesson is taking place and the Rochdale Training online background is used.

11. Learners must also make suitable arrangements to take their audio-visual sessions in an appropriate room; in most circumstances, no one else should be in the room whilst the lesson is taking place.
12. If the learner is under 18 years of age, or an adult in need, then a parent or carer or other responsible adult should be available to the learner during their online session and may be in the same room as the learner.
13. Tutors should be sensitive to the possibility that learners who are not alone during online teaching may not have sufficient room or privacy in their homes to allow them to be alone.
14. If a learner or parent (if the learner is under the age of 18 years) has concerns about any aspect of a session, they should contact Rochdale Training directly to discuss it and not raise issues during the lesson itself. All concerns and complaints are taken very seriously and will be dealt with in line with Rochdale Training's Complaint Policy where appropriate.
15. Learners will be able to use the audio and visual functions for their sessions.
16. 1-to-1 sessions and group-classified sessions with only one student will be carried out using audio and visual functions.
17. Students and staff must turn off all notifications on their device used for sessions to avoid disruption, unsolicited pop-ups and exposure of personal data.
18. Staff will be vigilant for signs and indicators of abuse and harm and if they form a concern about the safety of a learner, report this to a Safeguarding officer without delay.
19. Staff will be aware that some learner may be at heightened risk of safeguarding challenges including domestic abuse and radicalisation because of lockdown and will be especially vigilant for the signs and indicators that would give them cause for this concern.
20. Rochdale Training will conduct unannounced visits to remote sessions to check compliance.

All members of the Rochdale Training will be briefed about these arrangements.

REMOTE WORKING & MOBILE/INFORMATION SECURITY POLICY

1 Purpose of the Policy

- 1.1 Remote and mobile working is important to Rochdale Training and enables flexible working practices. The need for “anytime, anywhere” access to information has to be balanced however against the need for an appropriate level of information security.
- 1.2 This policy is intended to support Rochdale Training’s aim to enable its staff to work from any location on any suitable portable device whilst appropriately protecting the confidentiality, integrity and availability of the Company’s information assets. It is also intended to ensure that sub-contractors working off site apply equivalent protection to the information that they are handling.

2 Scope

- 2.1 Remote or mobile working comprises working on digital or hard copy information off site or on the move such as at home, at another institution, in a café, on the train or at a hotel.
- 2.2 This policy applies to all staff and sub-contractors.

3 Relationship with existing policies

This policy forms part of the Information Security Management Framework. It should be read in conjunction with the Information Security Policy and its supporting policies, specifically:

- Use of Technology, IT Facilities and IT Access Control Policy
- Social Media Policy
- Employee Data Protection Policy

4 Policy Statement

Rochdale Training shall deploy appropriate technical and organisational measures to mitigate information security risks associated with remote and mobile working; this will be provided via the secure Horizon platform. Rochdale Training will promote an environment in which information security practices are applied appropriately, consistently and logically across all remote and mobile information handling situations to reduce information-related risk to an acceptable level. Individual staff members and sub-contractors shall take responsibility for ensuring the security of the information they handle remotely via a portable device or from other premises is in line with these requirements.

5 Policy

5.1 When working remotely or on the move staff and sub-contractors (hereafter referred to as 'workers') shall ensure that Information is handled in accordance with Policy and Procedures, as applicable to the environment in which they are working.

5.2 At all times workers should guard against the possibility of unauthorised access to Information arising from an unrestricted environment. Specifically:

- Workers should not work on Highly Confidential Information in public places.
- Workers should take steps to ensure that the environment offers a suitable level of privacy (i.e. from other individuals in the vicinity being able to view papers or screens being worked on or being able to overhear private conversations) before working on any information outside of our premises.
- Workers should never leave papers or equipment containing information unattended outside of our premises unless they are appropriately physically secured from theft.
- Workers should ensure that any information is disposed of in accordance with Confidential Waste Guidance.
- Workers should take precautions when using public or free wi-fi services (such as those commonly found in public libraries and coffee shops) to ensure that any sites to which they are directed are the genuine sites and, once browsing is finished, to log off any services and tell the device to forget the network.
- Workers should avoid transmitting information (including sending their username and password) over an insecure network (e.g. one that does not start with 'https').

5.3 IT Equipment

Workers shall ensure that any IT equipment (including smartphones) used to work on Rochdale Training information remotely or on the move has been secured using the Horizon Client software.

5.4 Remote Access to Filestore and Applications

Workers are encouraged to use Horizon for accessing information where the information is not downloaded on to the remote or mobile device.

5.5 File Transfer, Synchronisation and Sharing Tools

Workers shall ensure that the use of any file transfer (including email), synchronisation and sharing tool to support remote or mobile working is compliant with Rochdale Training's Policies and Procedures. In particular workers must not put Information at risk of compromise of confidentiality or critical information at risk of loss through the use of non-secure tools and methods (such as non-approved third-party services) and/or personally owned accounts.

Workers shall not set up syncing of folders in such a way that information is stored on non-secured laptops or computer workstations.

Paper-based files should be kept secure at all times and only transferred if vitally important. This must be done by staff members physically or if using mail services by Special Delivery signed for mail.

6 Responsibilities

Department Managers are responsible for ensuring that staff are aware of the need to adhere to this policy when working remotely or on the move.

Individual workers are responsible for adhering to the information security framework policies and following the provisions of this and all related policies. Where the policy requirements are reliant on individual workers taking steps to secure the information, they are handling the individual member of workers will be personally accountable and liable for failing to follow the required policy, procedure or process. Individual workers are responsible for ensuring that any shortfalls in baseline security controls are reported promptly to their line manager and (where an incident has occurred) to IT Provider.

7 Compliance

Breaches of this policy may be treated as a disciplinary matter dealt with under the staff disciplinary policies. Where sub-contractors are involved breach of this policy may also constitute breach of contract.

Definitions

Information – any information (in any format) that Rochdale Training acquires, creates, modifies or stores in connection with its own business purposes.

RISK ASSESSMENT FOR LEARNERS UNDER 18

- Adults in Need

The workplace

Name of Company:

Please print

	Yes	No
Does the learner spend a long time alone with their work place supervisor/colleague(s)?	Red	Green
Does the supervisor/colleague(s) give regular lifts to the learner alone?	Red	Green
Is the supervisor/colleague(s) over familiar with the learner?	Red	Green
Do you have any concerns about workplace bullying, harassment or discrimination?	Red	Green
Do you have concerns any about the passing of drugs or the promotion of alcohol/substance misuse at the premises?	Red	Green
Does the supervisor/colleague(s) act in a safe and responsible manner?	Green	Red
Is the supervisor/colleague(s) supportive of the learner's training/qualification?	Green	Red
Is the supervisor willing to take part in reviews?	Green	Red
Does the supervisor/colleague(s) abide by the company's/RTA's Equality & Diversity Policy/Safeguarding/Prevent Policy?	Green	Red
Do you trust and respect the judgement of the management/supervisor of the work place?	Green	Red

If there are any ticks in the red boxes please speak to your Safeguarding Officer immediately

Learners

Name of Learner:

	Yes	No
Ask the learner "do you feel safe"?	Green	Red
Does the learner appear well, confident and content?	Green	Red
Is the learner prone to illness?	Red	Green
Is the learner showing signs of concerns e.g. language used, bruising, low mood etc.	Red	Green

N.B Ofsted state a number of situations may make learners particularly at risk, including:

	Yes	No
Living away from home	Red	Green
Disabilities (physical or mental)	Red	Green
Abuse or bullying	Red	Green
Race and racism	Red	Green
Neglect and Abuse, including Peer on Peer	Red	Green
Domestic violence	Red	Green
Drug misusing parents/family members	Red	Green
Families living temporary accommodation	Red	Green
Living as migrants, victims of trafficking	Red	Green
Unaccompanied asylum-seeking children	Red	Green
Young people being young carers	Red	Green
Showing signs of being drawn into anti-social behaviour or criminal behaviour, including gang involvement/association with organised crime groups.	Red	Green
Frequently missing/goes missing from care or from home.	Red	Green
At risk of being radicalised or exploited either sexual or criminal.	Red	Green
In a family circumstance, presenting challenges for the learners, such as drug and alcohol misuse, adult mental health issues and domestic abuse.	Red	Green
Misusing drugs or alcohol themselves.	Red	Green
Has returned home to their family from care.	Red	Green
Is a privately fostered child.	Red	Green

Mental health issues.	Red	Green
FGM issues.	Red	Green

Please tick if any of these situations apply and refer to a Safeguarding Officer immediately

Is the workplace suitable for learner, considering the above? Yes / No
 If no, please contact Safeguarding Officer immediately

Signed: _____ Date: _____

If you have any doubts at all about Safeguarding at the learner’s workplace or the welfare of a learner at work please speak to a Safeguarding Officer:

Rachel Yates: Mob: 07860 919379
Confidential Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Mob: 07377 400379
Confidential Email: safeguarding@rochdaletraining.co.uk

RISK ASSESSMENT OF WORKPLACES & WORKPLACEMENTS

GUIDANCE AND INSTRUCTIONS

RISK ASSESSMENT OF WORKPLACES AND WORK PLACEMENTS

We exist for the learners; they do not exist for our convenience. So we must go out of our way to ensure that all our learners are safe from harm. We need to put them first, consider how best to protect them and take action accordingly.

Consideration leading to the assessment of risk

1. Introduction

Rochdale Training is legally within the Further Education sector. The OFSTED Handbook for Inspection notes that, under section 175 of the Education Act 2002, which came into force in June 2004:

'The governing body of an institution within the further education sector shall make arrangements for ensuring that their functions relating to the conduct of the institution are exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the institution.'

Following the murder at Soham in Cambridgeshire of Holly Wells and Jessica Chapman by college caretaker Ian Huntley, the Safeguarding Vulnerable Groups Act 2006 was enacted to increase protection from harm for children, young people and adults in need. This Act under criminal law set up the Independent Safeguarding Authority in Darlington and its Vetting & Barring Service (ISA VBS). This is now known as the Disclosure & Barring Service (DBS). The barring lists POCA, POVA and List 99 have been included in two new lists from 11th October 2009. These new lists are: List A - those who have abused children – and List B – those who have abused young people and adults in need.

Anyone named on these lists has been sent a letter telling them that it is a criminal offence to apply for employment or volunteering work in regulated or controlled activity. Regulated activity is any kind of teaching, training, advice, guidance, counselling or instruction where staff or volunteers have frequent, intensive or overnight contact with those groups.

The Regulated Activity Provider (called the RAP), who may be the Managing Director, the board of governors or the head of HR/personnel for example (it is up to Rochdale Training to choose who bears criminal liability for any failure of the safeguarding system), must, by law, report to the DBS any employed staff or volunteers who harm children, young people and adults in need.

The RAP is also legally liable for ensuring that no person on List A or List B is allowed to work or be employed in any regulated activity at Rochdale Training.

Furthermore, the RAP may give permission for a listed offender to work in a controlled activity providing they are rigorously monitored.

In the period between May 2008 and 17 December 2009 there were many changes to Safeguarding regulations as defined in the Act.

2. Work Settings

One key decision was to remove the requirement for those who work with children, young people and adults in need in **work settings** to be registered with the DBS:

'Where young people under 16 work, the adults who teach, train or instruct them in the workplace will not be required to register with the DBS scheme.

But it will be an offence for a barred adult to do this work, or for an employer knowingly to use a barred person for this work.

Therefore, work experience organisers and those putting learners in to jobs will want to agree appropriate safeguarding measures with the employer. It is essential that young people in these placements are safe.

3. Risk-based Approach

Rochdale Training will therefore need to consider a **risk-based approach** to safeguarding for apprentices and other learners/students under the age of 18 who are in work settings.

This includes, but is not limited to the:

- Extent to which learners adopt safe practices and a healthy lifestyle.
- Emotional development and behaviour of learners.
- Extent to which the safeguarding provision contributes to the learners' capacity to stay safe.

It also includes training students and learners to ensuring the learning of:

- How to keep safe from accidental injury,
- Bullying,
- Harassment,
- Discrimination,
- Crime,
- Anti-social behaviour,
- Neglect,
- Sexual exploitation,
- Exposure to violence and other dangers.
- Online safety

4. **Safeguarding Officers must constantly review the** extent to which your safeguarding provision contributes to:

- A healthy lifestyle, including being physically, mentally, emotionally and sexually healthy,
- Being well nourished and active,
- Having self-esteem
- Choosing not to misuse drugs, alcohol and other substances.

Care, advice, guidance and other support must be provided where appropriate to safeguard welfare, promote personal development and achieve high standards.

- Check the adequacy and suitability of specialist equipment, learning resources and accommodation.

Ofsted inspectors may evaluate and make judgements on health and safety management arrangements during inspections. They will also review self-assessment reports.

Some of the topics that inspectors may consider are detailed below:

- Health, safety and welfare policies and procedures including risk assessments and health and safety checks on learning venues.
- That there are systems in place to guide and support learners and ensure their health and safety.
- The safety and suitability of work environments and environments provided for practical activities, and compliance with health and safety legislation.
- Evidence that personal protective equipment is used, and safe working practices are reinforced, followed and monitored.
- Learners' knowledge and understanding of employment rights, their own responsibility to work safely in respect of themselves and others, and their familiarity with health, safety and welfare arrangements.
- Compliance with legislation and procedures for protecting children and safeguarding young people and adults in need.

Where inspectors observe unsafe or dangerous practice, they will use their professional judgement about the appropriate degree of intervention to take.

5. Aspects of Safeguarding from Harm and Abuse in the Workplace

Staff visiting employers, workplaces and work placements need to ensure that your young students and learners are aware of the risks of working in an adult environment without alarming them. A calm sensible and professional approach is required. Once you have given them induction or other training briefings on the issues described in the first part of this guide, you will then need to consider if you have sufficient trust in the people they will be working with in the workplace – those who will teach, train or instruct them or act as their mentors. These rules apply to children (those under 18 years old) and also young people and adults in need.

When thinking about the trust you have placed or are going to place in work placement staff or workplace staff you should consider the following factors:

- (A) Is your student a child in law under 18 or is your student a young person or adult in need?** If they are not a child, young person or adult in need then the Safeguarding Vulnerable Groups Act (SVGA) does not apply to them from a legal safeguarding perspective – but you do still have to consider health & safety and anti-bullying and harassment (including cyberbullying) aspects of all your students and learners.
- (B) Is your student training or learning to carry out a regulated activity?** Examples are: Early Years or Health & Social Care. If they are learning to carry out a regulated activity, then the chances are that the provider of the work placement already IS a regulated activity in which case their manager will already be aware of the requirement to have their staff DBS checked.
- (C) You should note that 16 to 18-year olds** who do regulated activity as part of their education IF IN YOUR JUDGEMENT act improperly and are removed from their course having caused harm to a child, young person and adult in need, or having left the course voluntarily BEFORE or after caution, then the DBS must be notified. Providers who train students to do regulated activities are **personnel suppliers** and are bound by the SVGA to report those students to the DBS if they act illegally. See VBS Referral Guide held by RAP.
- (D) The next thing to consider is how frequently and intensively do employer staff come into contact with them?**

The DBS scheme only applies to employed staff or volunteers who come into contact with children, young people and adults in need:

Frequently: once per week or more each month
Intensively: on four days a month or more
Overnight: Between 2 AM and 6 AM.

If the employer's staff do not come into contact that frequently or intensively then no special safeguarding action under this law (SVGA) is required.

6. Vulnerability Checks

However – you must still need to consider other aspects of vulnerability – for example OFSTED state: 'A number of situations may make children and young people particularly vulnerable, including:

- Living away from home
- Disabilities (physical or mental)
- Abuse or bullying
- Race and racism
- Child abuse
- Domestic violence

- ❑ Drug-misusing parents/family members
- ❑ Families living in temporary accommodation
- ❑ Living as migrants; victims of trafficking;
- ❑ Unaccompanied asylum-seeking children or young people being young carers.'

Please note that there are different types of safeguarding and different types of vulnerability – for example:

In the above list OFSTED say that in their opinion someone with a disability is vulnerable but the Safeguarding Vulnerable Groups Act 2006 specifically says that a person IS NOT vulnerable by virtue of disability alone. Only when the person with a disability is receiving **health care** treatment, does the person become vulnerable under this particular aspect of the SVGA.

Furthermore, adults with a range of disabilities or learning difficulties are not all vulnerable.

7. Risk assessment of the workplace

In addition to the above, the ESFA requires that you consider:

- The extent to which learners adopt safe practices and a healthy lifestyle.
- Contribution to learners' capacity to stay safe and healthy.
- Adequacy of equipment, resources and accommodation.

Having considered all of the above factors you are now ready to risk assess the workplace.

Some Risk Factors are (but you may be aware of others):

- How young or vulnerable the student is
- Whether the student is well, confident and content or prone to illness, depressed, homeless, already being abused or bullied, tempted by drugs or excess alcohol?
- How long they spend alone with their workplace mentor, colleague or supervisor (for example do they give them a lift in their car to and from work?)
- Do you trust and respect the judgement of the manager of the work placement or workplace?
- Are you content that the appointed trainer or mentor acts in safe and responsible manner?
- Do they seem to be over-familiar with their colleagues or other students?
- Does the organisation allow 'initiation ceremonies' which are demeaning?
- Does the employer have a track record of permitting bullying, harassment or discrimination at work?
- Do you consider that there is any use or passing of drugs or inappropriate use of alcohol in the workplace?
- Is there a qualified first aider?

- Is the fire equipment regularly serviced?
- Are fire evacuations practised?
- Is the employer aware of the safeguarding officers at Rochdale Training?
- Is the location of the fire evacuation point and routes out of the building credible in an emergency?
- Is health and safety a high priority?
- Does the employer have an up-to-date equality & diversity policy or are they willing to sign to say they will accept and apply your policy?
- Does the supervisor take part in progress reviews?
- Are there any concerns about lone workers, poor lighting, insecure premises, poor driving skills by staff who might give a lift to your student?
- Does the employer have any rules about the administration of medicines at work? (For example, do they tell their staff never to give other staff members paracetamol?)

8. Evaluation of Risk and Final Decision

You will need to carefully consider all of the above – and because it is a complex process, it makes sense to discuss (where confidentiality permits) issues with colleagues and your Safeguarding Officers. Sometimes you may find that the workplace or work placement is just not safe – because:

- a) The learner is so upset or worried about home or other matters that they cannot cope with work.
- b) The managers and/or staff at the workplace or work placement do not display an understanding of the need to act fairly, prevent bullying, harassment and abuse, seem more concerned with profit than with health & safety.

In these cases, do not risk harm to a learner even if this means losing the chance of a work placement.

General Considerations

However, if the learner is already on the course and then circumstances change, stick with the learner, do not abandon them, increase the frequency of contact by visits and phone calls and talk to employer staff.

If employer's staff are not understanding, then ask the Rochdale Training Safeguarding Officer to talk to the Directors of the workplace or work placement.

If the learner is not employed but just gaining work placement experience, you may have to remove them from that work placement and find another.

If the learner is employed and workplace bullying is a factor, but they are not willing to leave, then do everything you can to get them through their course so that they are empowered by qualification to get another job elsewhere. In the meantime, try to influence employer staff behaviour.

Safeguarding Officers are only allowed to report Rochdale Training staff and volunteers to the DBS for harming conduct. If you are concerned about an employers' staff, supervisors or managers, then the Rochdale Training Safeguarding Officer should be informed so that the Local Safeguarding Children's Board, Adult Protection Committee, Police or Social Services can be informed about your concerns.

Suicidal Thoughts

People sometimes have suicidal thoughts. One learner has died from suicide whilst under NVQ assessment. Always report your concerns about a learner's state of mind to your Safeguarding Officer. Never dismiss such statements as cynical, funny or fantasy comments.

SAFE RECRUITMENT OF STAFF POLICY

THE SAFE RECRUITMENT OF STAFF POLICY & PROCEDURE

Rochdale Training is committed to the safe recruitment of employees to ensure the Safeguarding of our learners

The following procedures apply to the appointment of all staff.

Note: *In the case of non-UK residents or any employee who has lived outside the UK recently, suitable checks should be made in the relevant countries. This includes the Channel Islands and the Isle of Man. These checks could include criminal records checks or obtaining a letter from the professional regulating authority in the country in which the applicant has worked.*

At all times Rochdale Training shall comply with the recommendations and regulations as prescribed in the DfES publication *Safeguarding Children and Safer Recruitment in Education and Keeping Children Safe in Education* or any subsequent publication.

1. The advertising process:

- 1.1 Any advertisement for an employee of Rochdale Training whether temporary or permanent, full time or otherwise shall include details of the skills, abilities, experience, attitude and behaviours required for the post. The advert will also explain the extent to which the role will involve contact with children / adults in need as well as a statement of Rochdale Training's commitment to safe recruitment and shall make it clear that an appointment is subject to a satisfactory DBS disclosure at enhanced level. This statement is re-iterated on the job details supplied to any enquirers.

2. Application Forms:

- 2.1 Application forms will include a statement confirming that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relating to children.
- 2.2 Copies of our safeguarding policies/procedures will also be emailed/posted out with the application pack.

c. Shortlisting:

- 3.1 Short listed candidates will be asked to complete a declaration of their criminal record or Information that would make them unsuitable to work with children / adults in need. Any inconsistencies/gaps in employment and reasons given for them will be explored.
- 3.2 We reserve the right to carry out an online search of shortlisted candidates as part of our due diligence process. This may bring up issues to be potentially discussed at interview. All shortlisted applicants will be informed that online searches will be carried out and about their purpose.

d. Employment history and references:

- 4.1 Rochdale Training will aim, wherever possible to obtain a reference before candidates are interviewed. Rochdale Training will directly contact the referee for the reference and clarify content where information is vague or insufficient information is provided.
- 4.2 A reference will be sought (where possible) from the candidate's current employer and will be completed by a senior person. They will include details of when the applicant last worked with children / adults in need and also establish the reason for the candidate leaving their current or most recent post. At least one reference shall be sought.

4.3 Rochdale Training shall contact all referees to verify the details obtained through the recruitment/selection process.

e. The interview/selection process:

5.1 All employees shall attend an interview at Rochdale Training before appointment. They are required to bring with them documentary evidence at para 8.1 to verify their identity.

5.2 At each interview there shall be a session with at least one member of the panel, who will ask questions regarding the applicant's suitability to work with children, young people and adults in need.

5.3 At the interview, the interviewee will be asked specific questions to establish whether he/she has been involved in any incident that involved, or might lead to, any Safeguarding Incident. He/she will be required to disclose any details of any disciplinary incident (whether Safeguarding or otherwise) and shall account for any gaps in employment / training history.

5.4 Interviews will be conducted by at least two senior managers and will include a presentation/practical demonstration for teaching staff. There will be 2 interviews for teaching/delivery staff.

f. The Appointment Process

6.1 Once a candidate has been selected for a post an offer shall be made in writing, stating that the post is subject to a satisfactory DBS disclosure (including children's barred list information for those who will be engaging in regulated activity with children), a reference and the completion of a satisfactory probationary period. Rochdale Training will pay staff DBS checks.

6.2 All employees and voluntary workers will have been checked that they are suitable for working with children, young people and adults in need via the DBS disclosure. For those conducting regulated activity with children the DBS will also contain children's barred list information.

6.3 For those carrying out regulated activity, Rochdale Training will also contact: employer.access.gov.uk to check the individual is not prohibited from teaching.

Commencing Work in Advance

In exceptional circumstances, to satisfy the exigencies of Rochdale Training, the CEO may authorise an employee to commence work before receiving the full enhanced DBS. In this case the following procedures shall apply:

- The DBS application must have been made in advance (including children's barred list information if required)
- The employee would not normally be exposed to situations where he/she has access to children, young people and adults in need without supervision
- The employee is informed in writing, prior to the start of his/her duties that if the DBS subsequently obtained is not satisfactory Rochdale Training will terminate the employment without notice.

Staff are to note OFSTED guidance which Rochdale Training has adopted as good practice namely:

'Members of staff who are required to obtain DBS check certificates, may start work pending the arrival of the certificate as long as it has been requested, other recruitment checks have been made in line with the recommendations in Safeguarding children and safer recruitment in education and the college provides appropriate supervision until the checks are completed.'

This does not apply to any member of staff who will be working in regulated activity. They cannot start work until an enhanced DBS check has been received.

Starting Work Pending a DBS check

Ideally, where a DBS check is required, it should be obtained before an individual begins work. It must in any case be obtained as soon as practicable after the individual's appointment and the **request for a DBS check should be submitted in advance of the individual starting work.** As an independent training provider, we do not have access to standalone barred list check service and as such, anyone who will be working in regulated activity will not be able to start work without an enhanced DBS certificate containing barred list information.

Appropriate supervision for individuals who start work prior to the result of a DBS check being known needs to reflect what is known about the person concerned, their experience, the nature of their duties and the level of responsibility they will carry.

For those with limited experience and where the reference has provided limited information, the level of **supervision required, may be high.** For those with more experience and where the reference is detailed and provide strong evidence of good conduct in previous relevant work, a lower level of supervision may be appropriate.

For all staff without completed DBS checks, it should be made clear that they are subject to this additional supervision. The nature of the supervision should be specified and the roles of staff in undertaking the supervision, spelt out. The arrangements should be reviewed regularly, **at least every two weeks** until the DBS check is received.

g. Temporary Staff

- 7.1 Any temporary member of staff appointed directly by Rochdale Training shall be subject to the same procedure as permanent staff as described in Section 3, except that evidence of an enhanced DBS obtained in a bona fide training provider or FE institution that is less than 3 years old may be accepted, as long as all other checks have been carried out.

h. Evidence Required

- 8.1 All employees will have provided the following information, which shall have been verified by the CEO or other member of staff delegated:
 - a. Evidence of identity, including name, address and date of birth. Any documents acceptable for the DBS process are acceptable in this instance
 - b. The number and date of the DBS and children's barred list if required
 - c. Reference/ s
 - d. Rochdale Training's application form giving a full employment/training history with notes explaining any gaps and reasons for moving jobs
 - e. Relevant qualifications/certificates
 - f. Prohibition from teaching check (where appropriate)
 - g. Evidence of permission to work in the UK for a member of staff who is not an EEC national
 - h. Further checks as determined by the CEO, having regard for any guidance issued by the Secretary of State are required for any individual who lives or has lived outside the UK.

i. Records

- 9.1 A central record shall be kept by the Finance Manager which comprises the title and date of the appointment and verification that documentary evidence of 8.1.a – 1h has been seen.

9.2 Copies of these documents shall be kept within the individual's personal file.

j. Induction

- 10.1 All members of staff will be given an induction programme which will clearly identify Rochdale Training's policies and procedures, including Safeguarding, and make clear the expectations and codes of conduct which will govern how staff carry out their roles.
- 10.2 The programme will ensure that all new staff are aware of the following policies and procedures and how to access them:

Safeguarding and Welfare e.g. Health & Safety, Anti-bullying, Equality & Diversity, Internet Safety, Discipline and Grievance, Sexual Harassment, Anti-Radicalisation.
- 10.3 In addition all staff will be made aware of the channels for raising any concerns and have a separate safeguarding induction.
- 10.4 As good practice, Rochdale Training require all new members of staff to join the DBS Update Service as part of their employment contract.

k. Ongoing Employment

- 11.1 Rochdale Training recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. We will therefore provide ongoing training and support for all staff, as identified through performance management
- 11.2 We will also provide a range of opportunities where concerns can be raised, in order that staff feel that Rochdale Training's culture embraces safeguarding and communicates a clear framework to employees, parents and learners. To support this, we will use the Safer Organisation Checklist to monitor our progress and will report to the governing body on a quarterly basis.

l. Any person deemed unsuitable for work

- 12.1 In the event that any person (whether employed, contracted, a volunteer or learner) whose services are no longer used because he or she is considered unsuitable to work with children, young people and adults in need, Rochdale Training will report the matter to the relevant safeguarding authority.
- 12.2 In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from contract working, or volunteering.
- 12.3 Reports will include as much evidence about the circumstances of the case as possible.
- 12.4 Failure to make a report constitutes an offence.

m. Those for whom DBS checks are not required

- 13.1 Visitors to the CEO/other staff or those who have only brief contact with children, young people and adults in need in the presence of fully checked staff.
- 13.2 Visitors carrying out repairs or servicing equipment; building and other contractors properly supervised.
- 13.3 Volunteers or parents who only accompany staff at specific Association events or on one-

off trips (not involving over-night stays);

13.4 Secondary school pupils on work experience or similar;

13.5 Those on the site when learners are not present as long as they have left before pupils return.

This policy is reviewed annually and is ratified by the Board of Trustees.

Notes:

* Rochdale Training is committed to safeguarding and promoting the welfare of children, young people and adults in need and expects all staff and volunteers to share this commitment.

ADDENDUM

Training arrangements to repay costs incurred during external training courses

This agreement is made on (date)

And is made between:

Rochdale Training Association Limited (The Company) registered in England and Wales under company number (*number*) whose premises are at Fishwick Street, Rochdale, Lancashire, OL16 5NA and whose registered office is at (*address*) (*'the Employer'*); and

(*Name*) of (*address*) (*'the Employee'*)

Whereas

- A. The Employee is employed by the Employer as a (*job title*)
- B. The Employee has obtained a place in relation to a course of study leading to the award of (name of qualification) in (subject) at (name of college or institute of further or higher education) (-the Course')

Now it is hereby agreed as follows:

1. In consideration of the Employer agreeing to meet the costs of the Course which are set out in the Schedule to this Agreement ('the Costs'), the Employee undertakes to reimburse to the Employer the Costs if:
 - He voluntarily withdraws from or terminates the Course early without the Employer's prior written consent;
 - He is dismissed or otherwise compulsorily discharged from the Course, unless the dismissal or discharge arises out of the discontinuance generally of the Course.
 - His employment is terminated by the Employer for any reason either prior to completion of the course or within one year after the end of the course, except that, in the latter case, the amount which would otherwise be due to the Employer shall be reduced by 1/12th part of each part of the complete calendar month after the end of the Course during which the Employee remains employed by the employer or

- He resigns from the employment of the Employer either prior to completion of the course or within one year after the end of the Course, except that, in the latter case, the amount which would otherwise be due to the Employer shall be reduced by 1/12th part of each complete calendar month after the end of the Course during which the employee remains employed by the Employer.
2. To the extent permitted by law, the employee agrees that the Employer may deduct a sum equal to the whole or part of the Costs due under the terms of this agreement from his final wages (as defined in section 27 of the Employment Rights Act 1996) or from any other allowances, expenses or other payments due from the Employer to the Employee.
 3. If the Employee's final salary is not sufficient to meet the debt due to the employer under the terms of this Agreement, the Employee agrees that he will repay the outstanding balance to the Employer within one calendar month of the date of termination of his employment, such payment to be made as agreed with the employer.
 4. The amount due to the employer under the terms of this Agreement is a genuine attempt by the Employer to assess its loss as a result of the termination of the employee's employment and takes into account the derived benefit to the Employer. This agreement is not intended to act as a penalty on the employee upon the termination of his or her employment.

Signed:

 (Name of Employee)

Signed:

 For and on behalf of the Company

Schedule

(INSERT details of the costs to be met by the Employer in relation to the Course e.g. the Course fees, examination fees, the costs of books or other materials, any other expenses paid in connection with the Course etc)

NB: This Agreement must be signed by both parties prior to commencement of the course.

SAFEGUARDING QUESTIONS AND ANSWERS

The questions below are to enable us to revisit safeguarding during learner reviews in order to:

- Ensure our learners do not come to harm, are safe and feel safe
- Remind them about their rights to feel safe where they learn / work and their responsibility to respect other people's right to safety

This is a discussion document and any suggestions would be welcomed.

The questions will be reviewed annually to reflect the latest changes.

1. What do you understand by the term 'Safeguarding?'

- Safeguarding involves protecting those that are more vulnerable from harm, abuse or neglect
- It is also about impairment to health, safety and development and ensuring learners are growing up, training and working in circumstances that optimise their life chances

2. Who are the Safeguarding Officers at Rochdale Training?

- Rachel Yates
- Josh Harper

3. What are the types of abuse / harm?

- Physical abuse
- Sexual abuse
- Domestic abuse
- Psychological or Emotional abuse
- Financial abuse
- Neglect
- Discrimination
- Child on child
- Organisational
- Modern slavery
- Acts of omission

4. What would you do if you were being hurt or abused?

- Report it to your Tutor or Safeguarding Officer as soon as possible.

5. What are your rights and responsibilities regarding safeguarding?

Rights

- You have the right to feel safe where you learn/work
- Other people should not abuse you in anyway
- Other people should not threaten to hurt or abuse you

Responsibilities

- To respect other people's right to safety
- Not to hurt or abuse others
- Not to threaten to hurt or abuse others
- To report any abuse or circumstances you are concerned about

6. What would you do if you had concerns that a friend at the training centre was being hurt/abused?

- Report it to the Tutor or Safeguarding Officer as soon as possible

7. What is Cyber-bullying?

- It is the misuse of Information and Communication Technology (ICT), particularly mobile phones and the internet, deliberately to upset someone else
- This maybe by sending upsetting or bullying messages by text or e-mail or by sending offensive images

8. What would you do if you were being cyber-bullied?

- Tell your Tutor or Safeguarding Officer, parent or adult you trust
- Block the bully

9. What are the dangers when using the internet?

- Putting information / images online that you wished you hadn't
- Seeing images that are offensive / inappropriate
- Being bullied.
- Someone being inappropriate i.e. in a sexual way
- Feeling pressured to do things you don't want to e.g. talking in a way you don't like.
- Grooming/ Radicalisation
- Identity theft

10. What do you know about using the internet - safely?

- Never reveal any personal information about yourself in a chat room / social website i.e. full name, address, phone number, name of your place of work / training provider.
- Never meet in person someone who you have talked to on a social media website.
- Do not give any financial information out over the internet
- Never post an improper photo / video of yourself on the internet. You have lost all control over who sees it i.e. it may negatively impact your future.
- Be aware that a person can very easily hide behind the anonymity of the internet and claim to be anyone they want.
- Learn how to block or report someone who is behaving inappropriately
- Save the evidence – learn how to keep records of offending messages / pictures.
- Tell your Tutor, Safeguarding Officer, parents or responsible adult if you are being bullied or feel uncomfortable about another user on the internet.

11. How could you improve your personal safety when out and about e.g. during the dark evenings?

- Travel with a friend.
- Take your phone or phone card if you do not own a phone
- Be aware. Keep your eyes and ears open. It is not a good idea to listen to music on your headphones as it can stop you noticing everything that happens.
- Keep to crowded, well-lit areas and stick to routes you know well
- Tell people where you are going to be and when to expect you
- Trust your instincts – if you think something is not safe, you are probably right.
- Plan what you would do in an emergency so that you can act quickly. Knowing what you would do also gives you confidence e.g. if being followed go into a shop and tell the shop keeper or send a text message to someone who can help.
- Be prepared to run away. Give up your phone, purse or wallet. Your things can be replaced you cannot be
- Carry a panic alarm
- Scream and shout if you are attacked – your voice can be a very effective weapon. (Information based on Lumplugh recommendations)

12. Excessive consumption of alcohol can damage your health and lifestyle. However, if drinking alcohol, how do you keep yourself safe?

- Know your limits.
- Pace yourself. Alternate between alcohol and a soft drink. Watch your drink. Do not leave it unattended. It risks it being spiked. Tell a friend or member of staff if you feel disorientated, confused, sick or faint after a drink.
- Stick with your friends while you are out so you are in safe hands if you have overdone the alcohol and keep your mobile phone on you.
- If at a party, try and pour your own drinks to be in control of what you are drinking.
- Drink plenty of water – between or after drinking alcohol
- Eat a good meal before you go out.
- Make sure your judgement is not impaired. Some things sound like a great idea when you have had a drink but might not be if you were sober.
- Try to avoid feeling pressured into drinking more than you are comfortable with e.g. drinking competitions etc. Everyone's tolerance to alcohol is different.
- Be aware that drinking alcohol may change your behaviour and make you vulnerable to personal harm and crime.
- Never drink and drive.

13. What do you know about Cuckooing:

- Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing.

14. What are County Lines?

- 'County Lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, know as 'deal lines', to take orders from drug users.

15. What is Child Sexual Exploitation?

- Sexual Exploitation of children and young people under 18 involves exploitative situations, context and relationships where young people receive "something" (eg food, accommodation, cigarettes, alcohol, affection, gifts, money) as a result of engaging in sexual activities.

16. What would you do if you had concerns

- Tell your Tutor or Safeguarding Officer, parent or an adult you could trust.

17. What do you understand by the term radicalisation?

- The process by which a person comes to support terrorism and forms of extremism leading to terrorism.

18. What would you do if you thought you were a target or if you were concerned a friend was being radicalised?

- Tell your Tutor or Safeguarding Officer, parent or an adult you could trust.

19. What do you understand by the term grooming?

- The process by which someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate or exploit them.

20. What do you understand by the term consent in a relationship?

An agreement made by someone with the freedom and ability to decide something.

- To give consent to sex, a person must be 16 or over and have the ability to make informed decisions for themselves.

21. What are the signs of a healthy relationship?

- Respect
- Empowerment
- Acceptance
- Open communication
- Listening
- Caring
- Encouragement
- Appreciation
- Love
- Trust

22. What do you understand by the term sexual harassment?

- Unwanted sexual behaviour which you find offensive or which makes you feel intimidated or humiliated. This includes touching or groping.

23. What is domestic violence?

- Violent or aggressive behaviour within the home, typically involving the violent abuse of a partner.

SAFER ORGANISATION CHECKLIST

Use the following check list to evaluate the safety of our organisation

Policy or procedure	In place	Not in place	In progress	Notes
Recruitment and selection issues	x			
Same standard applied to all categories of employment	x			
Use of application form	x			
Job description/person specification sent to referees	x			
Referees asked to specifically comment on suitability for the post	x			
Applicants aware that previous employers may be contacted	x			
Written references taken up	x			
References obtained prior to interview				After interview
One member of panel to examine these prior to interview				After interview
References to be obtained for supply/agency staff or previous volunteers	x			
Questions asked on candidates safeguarding awareness	x			
Explanation of gaps in employment required	x			
Proof of identity required – originals not photocopies	x			
Academic qualifications checked – originals not photo-copies	x			
Self-Disclosure form for shortlisted applicants	x			
Online search of short-listed candidates completed	x			
No employment until appropriate level of DBS check has been done (see policy)				See policy
Above checks applied as appropriate to				

• Overseas staff	x			
• Supply or agency staff	x			
• Gap year/work experience students	x			Not school work experience
• Volunteers	x			
• Contractors	x			
Organisation communication and relationships				
Learners and parents/carers/staff confirm they can voice concerns	x			
These concerns taken seriously/view point valued	x			
Staff awareness of vulnerable children/adults and any communication difficulties	x			
Staff encouraged to comment on each others practice	x			
Low-Level concerns policy in place and staff are aware of it	x			
Provider seeks external advice to gain additional perspectives	x			
Provider works with parents and employers in the interests of protecting learners	x			
Policies				
Staff code of conduct to give clear expectations and boundaries	x			
Safeguarding policy and procedures including allegations made against staff and Prevent	x			Reviewed September 2023
Whistle blowing policy – clear mechanisms on how to report concerns	x			Reviewed September 2023
Harassment and Bullying policy	x			Reviewed September 2023
Online Safety Policy	x			Reviewed September 2023

Filtering and monitoring systems in place and auditing carried out	x			Reviewed September 2023 – Barracuda, Sophos, WatchGuard, Cisco Meraki
Physical environment				
Security system for visitors	x			New sign-in system – Aug 2023
Windows in doors	x			June 2012
No hidey holes/work in cupboards/storerooms	x			
Open plan classrooms where possible. PC's are visible to the tutor	x			
Open door policy for staff	x			
The curriculum				
Personal safety skills taught	x			Safeguarding curriculum in place
Critical thinking, sexual violence and harassment, Prevent, Staying Safe online, Healthy Relationships taught	x			Safeguarding curriculum in place

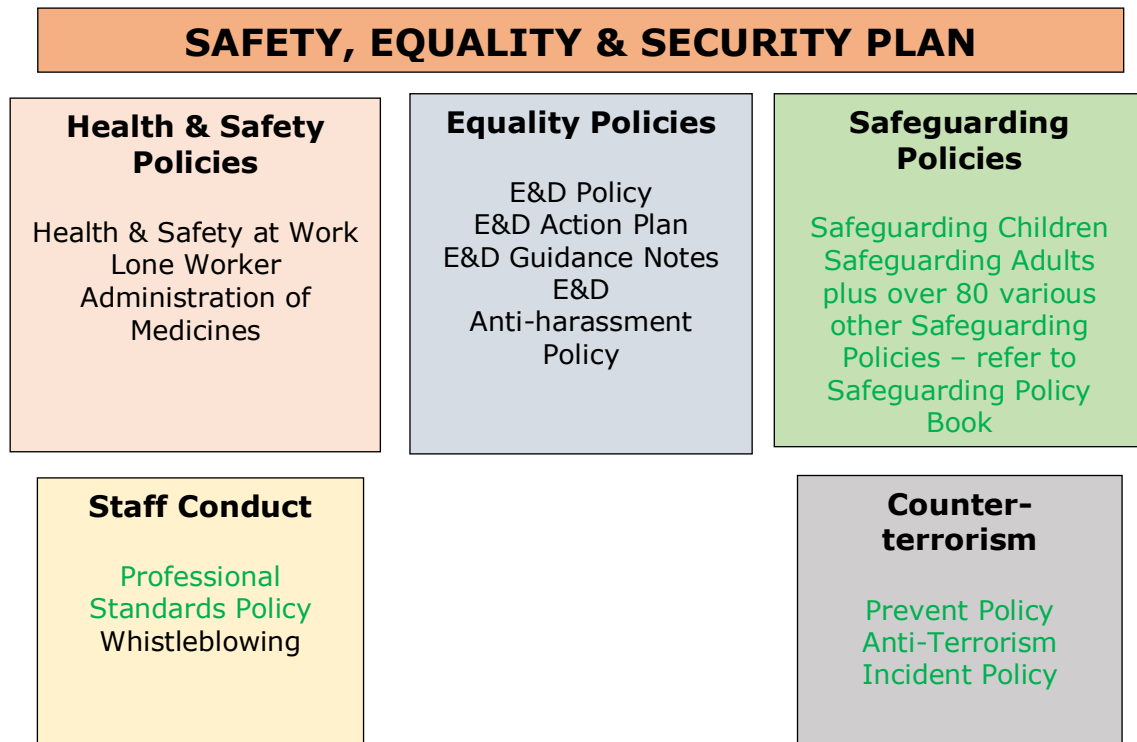
Policy or procedure	In place	Not in place	In progress	Notes
Staff training and supervision				
Formal Safeguarding training every year	x			Last training took place September 2022
Safeguarding updates	x			Takes place quarterly
Whole staff clarity re Safeguarding procedures	x			Staff guidance produced
Awareness of indicators of children/adults at risk and how to pass on	x			
Regular supervision/support re Safeguarding	x			Bi-monthly Safeguarding meeting

Records				
Records of concerns or incidents made promptly and accurately	x			Welfare Report Template.
Records kept securely and information shared appropriately	x			

SAFETY, EQUALITY & SECURITY STRATEGY

SAFETY, EQUALITY & SECURITY STRATEGY – OVERVIEW

This document details the key policies and plans for the safe and secure operation of Rochdale Training



Shown above are the five key areas for the safety & security of learners, visitors and staff with their relevant policies and supporting material.

Managers are to be fully familiar with all policies. All staff are to accept and abide by the policies. The Senior Safeguarding Officer, Health & Safety Officer and Equality & Diversity Lead will work as a team to ensure the policies are followed and that advice and support are given.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN LEARNERS POLICY

This policy has been developed alongside the DfE guidance ‘Sexual Violence and Sexual Harassment between Children in Schools and Colleges’ (Published September 2021 and embedded into KCSIE 2022 & 2023)

Introduction

Sexual violence and sexual harassment can occur between two children of any age or sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and this will be exacerbated if the perpetrator(s) attends the same school or educational setting. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Along with providing support to children who are victims of sexual or violence sexual harassment, perpetrators should be provided with an education, safeguarding support as appropriate and disciplinary sanctions implemented. A child abusing another child may be a sign that they have been abused themselves or a sign of wider issues that need addressing. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

Staff should be aware that some groups are potentially more at risk of sexual harassment/violence. Evidence shows that girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult learners and Rochdale Training staff are supported and protected as appropriate.

Rochdale Training will consider the following:

- Maintain the attitude of “it could happen here”
- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys, Schools, Colleges and Training Providers should be aware of the importance of:
 - Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up (Zero tolerance approach).
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- Understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why a whole organisation approach is important.
- Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse as it can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

The Evidence

The evidence highlights why it is important that all school and college staff have an understanding of what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

- Ofsted’s Review of sexual abuse in schools and colleges revealed how prevalent sexual harassment and online sexual abuse is for children and young people and that, the issues are so widespread that they need addressing for all children and young people.
- Nationally collected statistics show that there has been a sharp increase in reporting of child sexual abuse to the police in recent years. Figures that include all child sexual abuse cases show that the police recorded over 83,000 child sexual offences (including obscene publications) in the year ending March 2020.
- The Internet Watch Foundation reported its worst year on record for child sexual abuse online in 2021 as it confirmed 252,000 URL’s containing images or videos of children being sexually abused, compared with 153,000 the previous year.
- In the year ending March 2019, the police recorded 73,260 sexual offences where there is data to identify the victim was a child. Around one-quarter (27%) of these were rape offences. These totals are likely to be a significant under-representation of the true number of offences against young people in this age group.

- Police recorded crime data (England and Wales) for year ending March 2020 indicated that 51.9% of female victims and 62.4% of male victims of sexual offences were aged between 5 and 19.
- NSPCC's how safe are our children report 2020 found that girls are particularly vulnerable to sexual abuse, accounting for around 90% of victims of recorded rape offences against 13 – 15 year olds in England, Wales and Scotland.
- The Women and Equalities Committee (WEC) state that a number of large scale surveys found that girls are consistently reporting high levels of sexual harassment and sexual violence in schools and colleges.
- Girlguiding's Girls' 2021 Survey found that 67% of girls and young women aged 13-18 surveyed have experienced sexual harassment at school from another student, and that 29% first experienced sexual harassment when they were just 11-13 years old.
- Almost a quarter (24%) of female students and 4% of male students at mixed sex schools have been subjected to unwanted physical touching of a sexual nature while at school.

Sexual Violence

Rochdale Training is aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of our premises. When referring to sexual violence we do so in the context of child on child sexual violence.

For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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 his/her 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.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Sexual Harassment

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of Rochdale Training. 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.

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 and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment, which might include: consensual and non-consensual sharing of images and videos (nude or semi-nude), sharing of unwanted explicit content, up skirting, sexualised online bullying, unwanted sexual comments and messages, including, on social media and sexual exploitation, coercion and threats.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful Sexual Behaviours (HSB)

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two and should be considered in a child protection context.

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some ways, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour. Children displaying HSB often have experienced their own abuse and trauma. It is important that they are offered appropriate support.

A whole organisation approach to preventing child on child sexual violence and sexual harassment

The best response to child sexual violence and harassment are those which take a whole organisation approach to safeguarding. Rochdale Training will raise awareness of these topics throughout the curriculum and through additional units such as healthy relationships and consent. Rochdale Training has a clear set of values and standards and learners are taught about life in modern Britain and Safeguarding is built into the curriculum.

Responding to allegations

As part of our approach to sexual violence and sexual harassment, Rochdale Training will consider carefully if external input is necessary to train and/or support staff, teach children/learners and/or provide support to the children/learners.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure.

Rochdale Training will respond to reports of sexual violence and sexual harassment through planning, training and policies which will provide us with the foundation for a calm, considered and appropriate response to any reports.

When making decisions, we will do this on a case-by-case basis ensuring our "Safeguarding Children" Policy is followed and this will be undertaken with the designated Safeguarding lead taking a leading role, supported by other agencies, such as children's social care and the police as required.

Managing a disclosure/allegation

Rochdale Training's initial response to a disclosure from a child/learner is important. It is essential that victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with Rochdale Training's Children's Safeguarding Policy/Procedure. All staff should not assume that someone else is dealing with the alleged incident. If in any doubt, the member of staff should speak to a designated safeguarding lead. Rochdale Training's safeguarding principles remain the same and all staff are trained to manage a disclosure (Keeping Children Safe in Education). Victims should be reassured that they are being taken seriously and that they will be supported and kept safe.

Rochdale Training's safeguarding practise will include:

- Not promising confidentiality at this initial stage as it is very likely the concern will have to be shared further.
- Keeping in mind that certain children/learners may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listening carefully to the child/learner, being non-judgemental, being clear about boundaries and how the disclosure will be progressed.
- Only recording the facts as the child/learner presents them.
- Informing the designated safeguarding lead as soon as practically possible.
- Where the incident includes an online element, staff should not view or forward illegal images of a child.

The designated safeguarding lead will 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/learner is at risk or harm, is in immediate danger or has been harmed then a referral should be made to children's social care.
- Rape, assault by penetration and sexual assaults are crimes. The starting point is that reports should be passed to the police.

The designated safeguarding lead will balance the child or young person's wishes against their duty to protect them and other children/learners.

If the designated safeguarding lead decides to go ahead and make a referral to children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support offered.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider the:

- Victim, especially their protection and support.
- Whether there may have been other victims.
- Alleged perpetrator.
- All other children/learners and, if appropriate, staff at Rochdale Training.

Risk assessments will be recorded, either written or electronically, and will be kept under review.

The designated safeguarding lead will ensure they are engaging with children's social care and specialist services as required.

Action following a report of sexual violence/harassment

The designated safeguarding lead will complete a safeguarding picture and decide on the initial response. In all cases, we will follow our own safeguarding policy and procedures including the principles as per Keeping Children Safe in Education.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will need to be balanced with our legal duty and responsibilities.
- The nature of the alleged incident(s), including might a crime have been committed and consideration of harmful sexual behaviour.
- The ages of children/learners involved.
- The developmental stages of the children/learners involved.

- Any power imbalance between the children/learners, for example if the alleged perpetrator is significantly older.
- If the alleged incident is a “one off” or a sustained pattern of abuse.
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- Are there ongoing risks to the victim, other children/learners or staff.
- Other related issues and wider context, including any links to CSE and CCE.

Sexual violence and sexual harassment are not acceptable and will not be tolerated at Rochdale Training.

Options to manage reports

Rochdale Training (manage internally)

- In one off incidents, we may take the view that the children/learners concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally by utilising our behaviour policy and pastoral care support.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).
- It will be re-iterated that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

Early help

- If Rochdale Training decides that the children involved do not require statutory interventions but may benefit from early help, an early help referral to provide support as soon as possible will be submitted.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).
- Early help can be particularly useful to address non-violent HSB and may prevent escalation or sexual violence.
- It will be re-iterated that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

Referrals to children’s social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger Rochdale Training will follow its own safeguarding policy and inform the designated safeguarding lead who will make a referral to children’s social care. The safeguarding lead will work alongside and co-operate with the lead social worker.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).
- Parents or carers will be informed unless informing a parent/carer is going to put the child at additional risk. Rochdale Training will not wait for the outcome (or even the start) of children’s social care investigation before protecting the victim and other children. A risk assessment will be completed to help inform any decisions/actions.

Reporting to the police

- Where a report of rape, assault by penetration or sexual assault is made, reporting to the police will generally be parallel with referrals to children's social care. Rochdale Training will follow its own safeguarding policy and inform the designated safeguarding lead.
- Parents or carers will be informed unless informing a parent/carer is going to put the child at additional risk.
- Rochdale Training will work with the police to agree what information can be disclosed to staff and others, in particular the alleged perpetrator(s).
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Unsubstantiated, unfounded, false or malicious reports

- As set out in part one of Keeping Children Safe in Education, all concerns, discussions, and decisions made, and the reasons for those discussions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.
- If a report is shown to be deliberately invented or malicious, Rochdale Training will consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

Safeguarding and supporting the victim

Victims may not disclose the whole picture immediately, they may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, Rochdale Training will ask the learner if they would find it helpful to have a designated trusted adult, for example their tutor or designated safeguarding lead, to talk about their needs.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. There may be times when the learner finds it difficult and may express a wish to withdraw from lessons and activities. Rochdale Training will aim to make the victims daily experience as normal as possible. We will consider the age and development stage of the victim, the nature of the allegations and potential risk of further abuse. Rochdale Training will tailor the support to meet the needs of the learner on a case-by-case basis. The same process will apply for supporting the alleged perpetrator. Rochdale Training will also follow their disciplinary process if required.

STAFF CONDUCT POLICY

It is a vital part of our working life at Rochdale Training that we work together in harmony – learners, visitors, employers and staff together.

To this end we have a Staff Conduct Policy which sets out certain rules for behaviour which all are asked to accept and comply with.

1. Personal Relationships

It is vital that staff get on with each other. There are all sorts of relationships – for example:

- Family relationship;
- Business or commercial relationship;
- Financial relationship;
- Sexual and/ or romantic relationship
- Close friendship of a social nature, which extends beyond the workplace;
- Membership of a group or organisation which could be perceived to operate for the advancement of its members' interests to the detriment of others.

Disclosure: Where a personal relationship exists, has existed or develops between members of staff where one party has a management or supervisory responsibility over the other, the existence, or former existence, of the close personal relationship (but not necessarily its nature) should be disclosed to Rochdale Training's Chief Executive in private.

Staff who have, or have had, a personal relationship should not be involved in any recruitment, selection, performance and development review, promotion or other processes, which could be perceived to give unfair advantage or disadvantage to the person with whom they have or have not had such a relationship.

Where a relationship has not been declared and it is subsequently discovered that bias or unfair treatment had resulted from this in selection, performance and development review, promotion or other processes, Rochdale Training may consider pursuing the matter through the disciplinary procedure.

2. Relationships with Learners

Professional relationships between a learner and a member of staff is an important part of a learner's vocational development. It is vital that trust and confidence exist between staff and learners to ensure that learners derive maximum benefit from their studies. In this context a professional relationship is defined as one where there is:

- Tutoring;
- Teaching;
- Assessment;
- Supervisory and or pastoral care;
- Responsibility on the part of the member of staff

- a) Staff are strongly advised not to enter into a sexual and/or romantic relationship with a learner for whom they have this responsibility.
- b) Staff are not to contact or form relationships with learners using social media. They are not to post pictures of themselves taken by others, selfies or any other material on any social media link or website which is owned or used by a learner.
- c) The use of staff member's Facebook pages or Twitter feed for example is acceptable but if it is used to contact, befriend or influence any learner then if discovered it would be a disciplinary matter.
- d) Staff are also discouraged from entering into any other relationship, business, commercial, financial or a close friendship of a social nature, with a learner which could compromise, or could be perceived to compromise, the relationship of trust and confidence.

Rochdale Training recognises that such relationships may already exist, either when a member of staff is appointed or when a learner enrolls, and that a relationship may develop between a member of staff and a learner during their course of study.

Where a member of staff involved in such a relationship has an assessment, supervising, tutoring, teaching and or pastoral role for that learner, it is the responsibility of the member of staff to inform a Safeguarding Officer immediately in order that alternative arrangements can be made. This is to protect both the staff member and learner from accusations of unfair and preferential treatment.

It should be noted that whilst a child can consent to sexual activity once they reach the age of 16, under the Sexual Offences Act 2003 it is a criminal offence for a person over 18 (teacher, learner mentor, academic staff, etc) to have a sexual relationship with a child under 18 where that person is in a position of trust, even if the relationship is consensual.

Staff who are uncertain about whether they should declare a personal relationship with a learner are invited to seek guidance on a confidential basis from a Safeguarding Officer. Failure to declare such a relationship may result in disciplinary action being taken.

3. Gifts

The occasional exchange of business gifts, meals or low level entertainment is a common practice and is meant to create goodwill and enhance relationships. However, if the receipt of business courtesies becomes excessive, it can create a sense of personal obligation on the part of the recipient. Such sense of obligation can interfere with the individual's ability to be impartial in the transaction.

Any gift or hospitality received or given must not have any influence or intention to influence the party receiving the gift or hospitality. In no circumstances must any gift of money be made or received by Rochdale Training staff.

4. Bribery

Rochdale Training staff and third parties must conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Rochdale Training is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public and private funds for which it is responsible and in the management of its activities.

This is not just a cultural commitment on the part of the organisation; it is a legal requirement. Bribery is a criminal offence in most countries and corrupt acts expose Rochdale Training and its staff to the risk of prosecution, fines and imprisonment, as well as endangering our reputation.

This policy is mandatory. We attach the utmost importance to this policy and will apply a 'zero tolerance' approach to acts of bribery and corruption by any of our employees or third-party representatives (including agency workers, sub-contractors and associates).

Any breach of this policy will be regarded as a serious matter which after investigation may lead to disciplinary action and dismissal.

Staff should report all perceived or potential breaches of this policy to the Chief Executive.

THE 5 R's

The 5 R's

RECOGNISE

Recognise signs and symptoms you may become aware of in the victim, and the behaviour of the potential abuser which may cause you to be suspicious

RESPOND

Allow the child or adult in need to say as much or as little as they wish, do not ask leading questions. Do not make promises to keep things quiet; let them know who you have to tell and what might happen next

REPORT

Report immediately to your designated Safeguarding Officer

RECORD

Record what the learner has told you as soon as possible to capture as much as you can. Use the words they used rather than interpretation. This is important as you do not want to jeopardise any future investigation into the allegation.

REFER

Referrals should be made by the designated Safeguarding Officer or in conjunction with a senior manager. Referrals would be made to the local authority's Children/Adult Services and/or the Police.

TRIP PERMISSION FORM

Consent form for trips and other off-site activities

Learner Name:	
I confirm I give permission for my son/daughter	
a) To take part in trips organised by Rochdale Training and other activities that take place off Rochdale Training premises; and	
a) To be given first aid or urgent medical treatment during any trip or activity if required.	

Please note the following important information before signing this form:
The trip/activity covered by this consent include:
<ul style="list-style-type: none">• You can, if you wish, tell Rochdale Training that you do not want your child to take part in this trip/activity.
Please complete the medical information section below (if applicable) and sign and date this form if you agree to the above.

MEDICAL INFORMATION
Details of any medical condition that my son/daughter suffers from and any medication my child should take during off-site visits:

PARENT/GUARDIAN PERMISSION <i>(required for under 18s/ Vulnerable adults)</i>	<i>Please tick box to confirm agreement and sign below</i>	<input type="checkbox"/>
Signature: _____		
Date: _____		

USING THE INTERNET

Safe to Learn: A Guide to Using the Internet

The Internet is a source of all kinds of helpful information and facts. Unfortunately, some people use the Internet to try to victimise young people. For instance; child predators often visit chat rooms designed for young people in order to find out personal information and establish harmful relationships. Cyber bullies use the internet to harass or threaten young people. In addition, there are people who use the Internet to steal people's identities by collecting personal information. The Internet can be helpful in many ways, but always keep in mind some basic rules for online safety.

Online Safety Tips

- Never reveal any personal information in a chat room. This includes your name, family members' names, your address, phone number, email address, or the name of your place of work/learning provider. Personal information should remain private.
- When you are in a chat room do not feel obligated to answer any question that you are asked. You are free to stop chatting with someone at any time.
- In a chat room be aware of anyone who is asking about your relationship with your parents. The questioner may be trying to manipulate their way into your personal life
- If you are chatting with someone who is insisting on getting a particular answer from you or making you feel uncomfortable, it's time to move out of the chat room.
- When it comes to any of the social media websites, do not share any personal information about yourself such as your full name, address, phone number etc.
- Never meet in person someone who you have talked to on a social media website or any other website. A person can very easily hide behind the anonymity of the Internet and claim to be anyone they want.
- You should never post an improper photo of yourself on the Internet or text one to someone. If you do, you have given up all control of who will see the photo. Also, once a photo goes out on the Internet it will be there for years to come and can negatively impact your future.
- Never make a video of yourself that is improper or compromising. Once a video is release on to the Internet, it is impossible to get it back.
- Always be aware of the people you consider friends online. A person who is typing a message to you on the Internet can claim to live anywhere, be any age etc. It is easy for a predator to lie and manipulate a young person via the Internet.
- If you are bullied on the Internet, do not respond to the person. Tell your tutor, Safeguarding Officer, parents, carer or responsible adult about what is happening.
- Do not given any financial information out over the Internet such as credit card or bank account numbers.
- Remain vigilant when using social media and new technology such as AI, as these sites can often be used to promote fake news.
- If you have any concerns about your safety online, please talk to your tutor or Safeguarding Officer:

Rachel Yates: Tel: 01706 631417 Ext: 159 Mob: 07860 919379

Email: safeguarding@rochdaletraining.co.uk

Josh Harper: Tel: 01706 631417 Ext: 155 Mob: 07377 400379

WHISTLEBLOWING POLICY

Whistleblowing Policy – Public Interest Disclosure

Rochdale Training operates with the consent and co-operation of its staff and management – we are a team of people striving to give our best to ensure learners have a great learning experience.

However, things can go wrong at work or staff may come across issues of deep concern when visiting work placements or in their own private life.

This policy gives advice on how to go about whistleblowing in a legal manner.

The Government explains that:

'Whistleblowing' is when a worker reports suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'.

A worker can report things that aren't right, are illegal or if anyone at work is neglecting their duties, including:

- Someone's health and safety is in danger
- Damage to the environment
- A criminal offence
- The company isn't obeying the law, for example, not having the right insurance
- Covering up wrong-doing

Speaking to Management

The Chief Executive of Rochdale Training and the Board of Trustees want to know about wrongdoing and will listen to any staff member or learner in a confidential and supportive atmosphere when they wish to give information about issues of deep concern.

Managers will ensure your identity will be protected and also stop any cover-ups.

Telling Others

It may be that due to an incident you are no longer confident that a manager will deal with a controversial or illegal issue fairly. You may have lost trust through bullying, or harassment or a matter mishandled by a manager – or you may have come across an issue which is not connected with Rochdale Training but is so concerning that you want to take action. In these cases, the government gives the following rules based on the Public Interest Disclosures Act:

How to 'blow the whistle'

The way a worker can 'blow the whistle' on wrongdoing depends on whether they feel they can tell their employer. The worker should check their employment contract or ask for advice on the whistleblowing procedure. If they feel they can, they should contact their employer about the issue they want to report.

But if they really can't tell their employer, they should contact a prescribed person or body (see below).

In law, a worker can only tell the prescribed person or body if they think their employer:

- Will cover it up
- Would treat them unfairly if they complained
- Hasn't sorted it out and they've already told them

Example: Laura knows the Director of her bank is stealing clients' money - she reports it to the Financial Conduct Authority, not her employer.

If you decide to blow the whistle to a prescribed person rather than your employer, you **must** make sure that you've chosen the correct person or body for your issue. For example, if you are blowing the whistle on broadcasting malpractice you should contact the Office of Communications.

The fully updated list (2020) of places to report to can be found here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

A copy of the "Blowing the Whistle – list of prescribed people and bodies" document is available on the notice board. The document is a list of the prescribed persons and bodies who you can make a disclosure to. There is also a brief description about the matters you can report to each prescribed person.

Reporting illegal activity by people in public office

In addition, you could also blow the whistle to your legal adviser, in the course of obtaining legal advice, or to a member of the House of Commons about any matter specified in the Public Interest Disclosure (Prescribed Persons) Order 2014. A copy of this document is also available on the General notice board in the Reception area, however, make sure if you do look up this document on the internet that you choose the **2014 version** as the 1999 version has been revoked and far more public officials are now listed. *Note: this information is correct as at Feb 2022.*

The new list is set out in the Schedule to the Order and includes MPs, specified Government ministers and public bodies, together with 60 regulators. The broad effect of the Order, taken with section 43F of the Employment Rights Act 1996, is that **a worker will be protected by the Act** if he or she makes a qualifying disclosure to a person prescribed in the Order, reasonably believing that the failure disclosed is in the public interest and falls within the matters in respect of which that person is prescribed and that the information disclosed, and any allegation contained in it, are substantially true.

Reporting to a Member of Parliament

You can get the contact details for any Member of Parliament at the following link:
<http://www.parliament.uk/mps-lords-and-offices/>

Summary

In summary, please have trust in your managers that they will strive to put things right and protect your identity. But if you feel you can't, use only the legal methods open to you that are set out above.