SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURE 2021/2022

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PART A: SAFEGUARDING AND CHILD PROTECTION POLICY

1. INTRODUCTION

1.1 Hopwood Hall College has a commitment to the mental and physical health and wellbeing of both learners (including apprentices) and staff (children/young people and those deemed to be vulnerable adults) and fully recognises the contribution it can make to protect and support them. The College has a moral and statutory duty to safeguard and promote the mental and physical welfare of all its learners and endeavours to create and maintain a safe and welcoming learning environment (where learning takes place both at a college campus or outside for example in the workplace) where they are respected and valued. The college will identify where there are safeguarding concerns regarding its learners and take action to address them in partnership with other organisations where appropriate.

1.2 There are **two key principles** that underpin safeguarding practices, these are:

1. **Safeguarding is everyone's responsibility:** for services to be effective each professional and organisation should play their full part;
2. **A child or vulnerable adults centred approach:** for services to be effective they should be based on a clear understanding of the needs and views of children, learners and vulnerable adults within the setting. Staff should at all times consider what is in the best interest of the child / young person.

1.3 There are three main elements to our Safeguarding and Child Protection Policy:

- **Prevention:** e.g. positive college atmosphere, teaching and pastoral support to learners.
- **Protection:** By following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding and Child Protection concerns/disclosures.
- **Support:** To learners and staff and to children, young people and vulnerable adults who may have been abused or neglected or whose mental and physical health is at risk.

1.4 This policy has been developed in accordance with the principles:

- Keeping Children Safe in Education (2021)
- Working Together to Safeguard Children (2018)
- The safeguarding duty of colleges as set out in section 175 of the Education Act 2002 and Children Act 1989 and 2004

1.5 Other legislation and guidance that apply include the Sexual Violence & Harassment between children (2021), Education and Training (Welfare of Children) Act 2021, Children and Families Act 2014, Children and Social Work Act 2017, Counter Terrorism and Security Act 2015, Disability SEN Code of Practice 2014, Children and Family Act 2014, Mental Capacity Act 2015, Care Act 2015, Serious Crime Act 2015, Voyeurism (offences) Act 2019 and statutory guidance: *'Coronavirus (Covid-19): safeguarding in schools, colleges and other providers'*; 'What FE colleges and providers will need to do from the start of the 2020 autumn term' July 2020; *'What to do if you are worried a child is being abused – Advice for practitioners*' and the Prevent Duty 2015, *Guidance for safer working practice for those working with children and young people in education settings* (May 2019), and NSPCC guidance '*when to call the police guidance'*.

1.6 The policy also meets the procedures and protocols under the Rochdale Borough Safeguarding Children's Board (RBSCB), Rochdale Safeguarding Adults Board (RBSAB) and the Greater Manchester Safeguarding Procedures which can be found at www.rbscb.org and www.rbsab.org

1.7 Hopwood Hall College takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our college to identify, assess, and support those children or young people who are suffering harm. Section 11 of the Children Act 2004 places duties on the college and individuals to ensure their functions and services have regard to the need to safeguard and promote the welfare of children.

1.8 The College recognises that the Prevent agenda is fundamentally linked to the safeguarding of our students and staff and meets the Prevent Duty under the safeguarding arrangements within this policy and through its Prevent Strategy and the Equality Diversity and Inclusion Policy. The Prevent Strategy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015 which states that specified authorities including Further Education Colleges, in the exercise of their functions, must have "*due regard to the need to prevent people from being drawn into terrorism*".

1.9 The Principal and the Board of Governors recognise their responsibility in ensuring that arrangements are in place to safeguard and promote the welfare of our students, as defined and required by the relevant statutory instruments.

1.10 This policy must be read in conjunction with other college policies which details specific responsibilities for other aspects of safeguarding.

1.11 **Policy Principles:**

- The welfare of the student/apprentice is paramount;
- Safeguarding and promoting the welfare of children and young people is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play.
- Professionals should make sure their approach is **child/young person centred** and should consider at all times what is in the **best interest** of the child/young person.
- **All** staff have a responsibility to provide a safe environment in which children and young people can learn.
- All students have equal rights to protection regardless of age, sex, ability, culture, ethnicity, language, religion or belief, sexual orientation, gender identity and socio-economic status. This policy will not discriminate either directly or indirectly against any individual on these grounds or any other protected characteristics;
- Safeguarding is everyone's responsibility and all staff have an equal responsibility to act on any suspicion or disclosure that may suggest a student is at risk of harm; and
- Students and staff involved in safeguarding and child protection and vulnerable adult protection issues will receive appropriate support and/or training with regular safeguarding updates.

SCOPE

The policy applies to all adults: staff including temporary[1], governors and volunteers at the college. Safeguarding is the responsibility of **all** adults and especially those working with children, young people and vulnerable adults. We recognise that all adults, have a full and active part to play in protecting our students from harm, and that the child or young person's welfare is our paramount concern. All staff believe that our college should provide a caring, positive safe and stimulating environment that promotes the social, physical and moral development of the individual student. Throughout this policy "Student" and "Learner" also refers to apprentices.

2. PURPOSE

2.1 Hopwood Hall College acknowledges that Child Protection is part of safeguarding and promoting welfare of our staff and students and that ***a child or young person(s) centred approach is fundamental*** to safeguarding and promoting the welfare of every child and young person. Accordingly, whatever the form of concerns, abuse or harm, all staff should put the needs of the child / young person or vulnerable adult first when determining what action to take.

2.2 As such this **Policy (Part A)** has been written to provide an overview of the college's position and arrangements in respect of Safeguarding and Child or Vulnerable Adults Protection and provides clear direction to staff and others about expected codes of behaviour in dealing with Safeguarding incidents and situations.

[1] Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and governors

2.3 Part A has included the college procedures for working during remote periods and with the impact of COVID-19. A summary of the key changes can be found on the Hub under the documents section and in appendix 4.

2.4 It also provides staff with clear **Procedures (Part B)** about the action staff should take in the event that they are concerned about a child, young person or vulnerable adult. This ensures that Safeguarding concerns and Child Protection / Vulnerable Adults referrals are handled sensitively, professionally and in ways which prioritise the needs of the child or vulnerable adult.

2.5 For the purposes of this policy, ***Safeguarding and promoting the welfare of children, young people and vulnerable adults is defined*** as[2]:

- Protecting children and young people from maltreatment
- Preventing impairment of children/ young people's mental and physical health or development
- Ensuring that children / young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes.

2.6 A copy of the key terms and definitions have been included in Appendix 1: Glossary of terminology.

2.7 Safeguarding is an all-encompassing term used to describe many aspects of college life including:

- Learner health, safety and welfare;
- Bullying and cyber-bullying;
- Internet or online safety including e-safety;
- Harassment and discrimination including hate crime and racist abuse;
- Mental Health and Wellbeing;
- Staff recruitment;
- The use of physical intervention;
- Meeting the needs of students with medical conditions and LLDD;
- First aid;
- Alcohol, drug and substance misuse;
- Educational visits;
- Behaviour Management;
- Staff Conduct and Professional Standards;
- Code of Conduct;
- Intimate or personal care;
- Extremism, radicalisation and Prevent;
- The security and safety of the college campus or place of learning; and
- Issues which may be specific to the local area or population, for example child sexual exploitation (CSE), child criminal exploitation (CCE), youth crime or serious youth violence and gang related activity.

2.8 This policy covers all college students whether they are based on or off campus in both classroom and work-based learning. The policy will be reviewed at least annually and is linked with the following policies and procedures:

- Behaviour Support Policy;
- Bullying & Harassment Policy;
- Code of conduct;
- Prevent Strategy;
- External Speakers and Events Policy;
- Online Safety Policy;
- ICT Acceptable Use Policy;
- Data Protection and Information Sharing Policy;

[2] Taken from Keeping Children Safe in Education Sept 2020

- Health and Safety Policy;
- Whistle Blowing – Speaking Out Policy;
- Safer Recruitment Policy;
- Staff Allegation Management Procedures;
- Staff Professional Guidelines;
- Complaints Procedures;
- Teaching and Learning Polices;
- Tutorial Policy;
- Equality, Diversity and Inclusion Policy;
- Mental Health Strategy and
- SEND (Learning Support) Strategy.

POLICY STATEMENT

This policy will not discriminate either directly or indirectly against any individual on grounds of sex, race or ethnicity, sexual orientation, religion or belief, age, disability, inclusion need, gender identity, socio-economic status or any other protected characteristic.

AIM

- To ensure all staff are informed and aware of the College's Safeguarding and Child Protection policy and procedures to enable them to meet their safeguarding responsibilities and reporting possible cases of abuse;
- To encourage self-awareness and an atmosphere in which learners find staff approachable to enable communication of any issues which may be affecting their lives;
- To ensure consistent good practice in following procedures thereby ensuring staff respond appropriately and sensitively to Safeguarding and Child Protection concerns;
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to;
- To provide a systematic means of monitoring children, young people and vulnerable adults known or thought to be at risk of harm, and ensure we, the college, contribute to assessments of need and support packages for those children and young people;
- To provide support and promote clear lines of communication between all staff members;
- To develop a structured procedure within the college which will be followed by all members of the college community in cases of suspected abuse;
- To develop and promote effective working relationships with other agencies, especially the Police, Childrens Social Care, Adult Social Care and Channel;
- To ensure that all staff and volunteers working within our college who have substantial access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check, and a central record is kept for audit; and
- To demonstrate the college's commitment with regard to safeguarding and child protection to students, parents and other partners.

ROLES AND RESPONSIBILITIES

2.9 Safeguarding and child and vulnerable adult protection concerns could happen anywhere, and **all staff** should be alert to possible concerns being raised in the college. **All adults** working with or on behalf of children have a responsibility to safeguard and promote the welfare of children and vulnerable adults.

2.10 **All** staff should be prepared to identify children who may benefit from early help. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in this policy. The

Teachers' Standards 2012 state that teachers (which includes head teachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

2.11 The college has designated staff who lead on safeguarding and who provide support to staff to carry out their safeguarding duties and who liaise closely with other services such as children's social care. The designated safeguarding officers are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The roles and names of those carrying these responsibilities at Hopwood Hall College are listed below.

2.12 Safeguarding concerns regarding children, young people and vulnerable adults should be referred to one of the Designated Safeguarding Lead (DSL) or Safeguarding Officers (SO). However, staff may raise concerns directly with Children Social Care services or the LADO if required.

2.13 The governing body understands and is committed to ensuring that the College fulfils its responsibility on safeguarding and child protection and that **all staff** are aware of the systems within the college which support safeguarding by ensuring that:

a. there is a Safeguarding / Child Protection policy in place at the College;
b. a behaviour support policy is in place;
c. there is a staff behaviour and conduct policy in place (Staff Professional Guidelines);
d. the College operates safe recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training and that a safeguarding question is asked to all applicants;
e. there are procedures for reporting and dealing with allegations of abuse against members of staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned;
f. a senior leader has Lead Designated Officer responsibility under their remit (SLT DSO);
g. all designated and deputy safeguarding officers undertake initial training with Rochdale Borough Safeguarding Children Board (RBSCB) and refresher training at least every 2 years;
h. all other staff have safeguarding training updated as appropriate at least every 3 years;
i. the College provides a safe environment for young people and vulnerable adults;
j. the College identifies young people and vulnerable adults who are suffering, or at risk of suffering significant harm and takes appropriate action to see that they are kept safe;
k. any weaknesses in child protection and safeguarding are remedied immediately;
l. a member of the Governing Body is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Principal.
m. the Safeguarding and Child Protection Policy is reviewed annually and that it is available on the College website or by other means;
n. the governing body considers how the College raises awareness of issues relating to safeguarding and promoting the welfare of young people and vulnerable adults in the College;
o. enhanced DBS checks are in place for Governors;
p. the **Designated Governor** from the Corporation is Steve Taylor;
q. the **College Principal** has overall responsibility for Safeguarding and Child Protection and will ensure that reports to Governors are made at least annually.

2.14 The **Designated Governor** is responsible for liaising with the Principal and Senior Staff Member with Lead Responsibility over matters regarding safeguarding, including:

- ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Board's procedures;
- ensuring that the governing body considers the College policy on safeguarding each year;
- ensuring that each year the Governing Body is informed of how the College and its staff have complied with the policy, including but not limited to, a report on the training that staff have undertaken and safeguarding incidents;

- overseeing the liaison with external agencies in connection with allegations made against the Principal or Staff Member with Lead Responsibility. This will not involve undertaking any form of investigation, but will ensure clear and transparent communication between the parties and provide information to assist enquiries;
- to assist in these duties, the Designated Governor shall receive appropriate training.

2.15 **Staff Member with Lead / Senior Responsibility – DSL Tracey Marrow and SLT Safeguarding Lead Caroline Street**

The College has named senior member of staff and a member of the Senior Management Team with lead responsibility for Safeguarding and Child Protection. Together they will:

- Have a duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young people and vulnerable adults, and the promotion of a safe environment for both learning and those being cared for within the College;
- Ensure that Safeguarding and Child Protection concerns or allegations against adults working in the college are referred to the Local Authority Designated Officer (LADO) for advice, and that any member of the staff found not to be suitable to work with children will be notified to the DBS for consideration for barring;
- Act as the specific person of contact for Prevent and Channel referrals. To take a lead role for concerns raised regarding extremism, radicalisation;
- Provide and take a lead on single agency training to staff and governors;
- Ensure policies and procedures are reviewed and updated;
- Receive training in safeguarding and inter-agency working, as required by the Rochdale Borough Safeguarding Children Board (RBCSB);
- Provide reports to Governors at least annually with details of changes to policy and procedure, training undertaken by DSOs, and by all staff and governors, number and type of incidents / cases, and number of children on the child protection register;
- Receive refresher training at least every 2 years;
- Lead on whole college training;
- Keep up to date with developments in safeguarding issues.

2.16 **Designated Safeguarding Lead (DSL)**

The named Designated Safeguarding Lead with specific responsibility for operational safeguarding and Child Protection and Vulnerable Adults Protection is **Tracey Marrow**, Safeguarding, Pastoral & Welfare Manager. DSL is supported by the Safeguarding Officers **Katie Howarth, Sadia Khan, Jacob Mahony and Laura Hilley**

The Designated Safeguarding Officers (DSOs):

- Receive training in safeguarding and inter-agency working, as required by RBSCB, and will receive refresher training at least every year and level 3 training every 2 years;
- Know how to receive and make an appropriate referral;
- Ensure college records are maintained and up to date;
- Are available to provide advice and support to other staff on issues relating to safeguarding
- Will deal with individual cases, including attending case conferences and review meetings as appropriate;
- Ensure names and contact details of DSOs and a statement explaining the college's role in referring and monitoring cases of suspected abuse is clearly advertised in the college and are a part of student induction;
- Support the Senior DSO with college wide staff training;
- Support the Board with Borough wide training if relevant;
- Act as designated teacher for Looked After Children (LAC) and Care Leavers. The named **Designated Teacher** at Hopwood Hall College is **Tracey Marrow** and will have responsibility for liaising with the Local Authority Personal Advisor for any issue of concern affected LACs or Care Leavers

- Support with referrals to Channel. At Hopwood Hall College the lead person is DSL **Tracey Marrow**
- Referrals regarding High Risk behaviours should be sent to **Katie Howarth, Laura Hilley or Nicola Metcalfe** for learners with SEN
- Ensure Deputy DSOs and Pastoral Welfare Team carry out their safeguarding roles according to policy and guidelines
- Ensure all safeguarding issues / referrals are logged and reported centrally; and
- Will refer any concerns regarding potential bullying, harassment and extremism incidents.

2.17 The staff members names with **lead responsibility** are responsible for:

- Overseeing the referral of cases of serious harm;
- Providing advice and support to other staff on issues relating to safeguarding;
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral);
- Ensuring that parents of young people and vulnerable adults within the College are aware of the College's Safeguarding and Child Protection Policy;
- Liaising with agencies as appropriate;
- To ensure that appropriate arrangements / protocols are followed to safeguard them whilst undertaking college programmes;
- Ensuring that they or identified staff attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with parents;
- Ensure accurate, effective and timely record keeping;
- Ensuring that any young people on child protection plans who are un-expectantly absent from college for 2 or more consecutive days is referred to their key worker in the social care team;
- Ensuring that staff receive basic training in safeguarding issues and are aware of the College safeguarding procedures at induction and on a renewal basis;
- Ensuring safer recruitment procedures are in place (HR);
- Overseeing allegations made against members of staff;
- Provide support to staff working with children and young people who have or are suffering from harm, or who find themselves in stressful and upsetting situations from a safeguarding concern;
- Reporting annually to the governing body of the College on how the College has discharged its duties; and
- Reporting deficiencies in procedure to the governing body at the earliest opportunity.

2.18 **The Pastoral Welfare Officers (PWOs)** will also act as **Safeguarding Officer(s) (SOs)** for the College in the absence of a member of the main Safeguarding Team. PWOs are appropriately trained and carry out those functions necessary to ensure the on-going safety and protection of students. In the event of the long-term absence of the designated person, the PWOs will assume all of the functions above. The PWOs will be based out of the HUB and will provide early help and support to learners for a range of pastoral, welfare and mental health concerns.

2.19 **All staff** (employed, volunteers and College apprentices) and **governors** will receive training on Safeguarding and Child Protection during induction and periodically renewed to maintain their understanding of signs and indicators of abuse – every three years.

PROCEDURE

3. DISCLOSURE OF ABUSE AND REPORTING CONCERNS

3.1 Sometimes a member of staff may have suspicions that a student is being abused or is at risk of significant harm. A student may also disclose to a member of staff that s/he is being abused. In these circumstances, the procedure outlined below should be followed:

(a) Reporting to Designated Staff – DSOs - Staff should report any concerns, suspicions or disclosures immediately to one of the Designated Officers via the dedicated telephone numbers 07850 323 664, 07903680819, 07496387321 and email address safeguarding@hopwood.ac.uk. All staff will also have access to Promonitor.

(b) **Significant Concerns:** If a member of staff has significant concerns about a young person or vulnerable adult, they should contact a Designated Safeguarding Officer immediately via the dedicated telephone number, who will consider and advise whether the concerns should be formally referred by the college.

(c) **Disclosure of Abuse:** If a young person or vulnerable adult discloses abuse, or if abuse is suspected, staff should:

- Listen carefully and stay calm;
- Question normally using open questions, and without pressure, in order to be sure that what the young person or vulnerable adult is saying is fully understood;
- Reassure them that by telling a member of staff, they have done the right thing;
- Inform them that the information must be passed on, but that only those who need to know about it will be told. Inform the young person or vulnerable adult to whom the matter will be reported; and
- Contact a Designated Safeguarding Officer via the dedicated safeguarding telephone numbers as soon as possible and always within 24 hours.

Staff should not:

- Ask leading questions;
- Try to investigate concerns or allegations;
- Take photographs of any injuries;
- Discuss disclosure information with other members of staff; and
- Promise confidentiality.

(d) **Reporting to the Principal / SLT Lead -** The Designated Safeguarding Officer must notify the Principal or SLT Lead as soon as practicable of any serious high-risk disclosure or suspicion being raised, and always within 24 hours.

(e) **Contact with Social Care -** The Designated Safeguarding Officer must report the matter Social Care or to the Police immediately by telephone and follow this up in writing within 24hrs.

3.2 The Designated Safeguarding Officer should discuss with the social worker:

- The action taken to inform the parents of the young person or vulnerable adult if appropriate. A note of that conversation should be made.
- The process for keeping the College informed of further action taken
- Ensure concerns are recorded on CPOMs.

3.3 **Under 16 College Learners -** In the case of a young person attending college from a school, the Designated Safeguarding Officer should liaise closely with the school's Designated Safeguarding Officer and keep them informed fully at all stages.

4. SAFEGUARDING ALLEGATIONS AGAINST STAFF

4.1 Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. **All staff must remember that the welfare of the student is paramount.**

4.2 All staff working with children, young people and vulnerable adults are in a **position of trust and authority**. The Staff Allegation Management Policy will apply when there are concerns that a person would pose a risk

of harm and / or an allegation relates to a person who works with children, young people or vulnerable adults who has:

a) Behaved in a way that has harmed a child, or may have harmed a child;
b) Possibly committed a criminal offence against or related to a child;
c) Behaved towards a child or children in a way that indicated they may pose a risk or harm to children; or
d) Behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferable risk).

4.3 In relation to d) above, college would need to consider transferable risk. This is where a member of staff or volunteer is involved in an incident outside of college which did not involve children but could have an impact on their suitability to work with children. For example, a staff member involved in domestic violence at home – the college needs to consider even if no children were involved, what triggered these actions and could a child in the college trigger the same reaction, therefore being put at risk. In such instances the staff should be referred to HR and the Senior Safeguarding Lead for investigation. (KCSiE 2020)

4.4 The College's Allegation Management Policy and Speaking Up Policy enable staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. The College Professional Guidelines outline behavioural standards expected by all staff.

4.5 When an allegation is made against a member of staff, set procedures must be followed. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory and requires careful consideration, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected. In the case of supply or agency staff, college should ensure they work with the agency but cannot cease an agency members employment without investigation and referral to the LADO.

4.6 Allegations against staff should be reported to the SLT Safeguarding Lead Caroline Street in the first instance who will refer to the College Senior Lead for Safeguarding, the LADO and/or HR for investigation.

4.7 Staff who are aware of concerns or allegations against a staff member or professional who **fails to share the information** or does not do so **immediately**, will be subject to college disciplinary action themselves for failure to share information.

4.8 Full guidance on dealing with allegations against staff can be found in the ***College Allegations Management Policy***.

4.9 See DBS policy for guidance on procedures for staff with offences on their records that may need the Senior DSO to investigate.

5. SAFER RECRUITMENT

5.1 The college endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in **Keeping Children Safe in Education** (September 2021). Full guidance on safer recruitment can be found in the College Safer Recruitment Policy.

5.2 Safer recruitment means that all applicants will:

- be asked questions relating to safeguarding through the application and/or interview process;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of their identity;
- verify any professional qualifications;
- be checked through the Disclosure and Barring Service (DBS) as appropriate to their role;
- be interviewed should any concerns arise from the DBS.

6. STAFF TRAINING

6.1 The Principal, Governors and all staff working with young people and vulnerable adults will receive training adequate to familiarise them with safeguarding and child protection issues and responsibilities and the College policy and procedures, with refresher training at least every three years.

6.2 All new members of staff will undergo an induction that includes basic Safeguarding training and familiarisation with the college's Safeguarding and Child Protection Policy and procedure.

6.3 All staff sign via NETConsent to confirm they have read the College's Safeguarding and Child Protection Policy and Procedures, Professional Guidelines and Keeping Children Safe guidance (part 1) annually. A copy of the policy is also available on the college website and the HUB.

6.4 Managers will receive training on safer recruitment practices.

7. PROCEDURES

7.1 Where it is believed that a child, young person or vulnerable adult is suffering from, or is at risk of significant harm, the College will follow the Rochdale Borough Multi-Agency Safeguarding Children procedures located at www.rbscb.org and www.rbsab.org Please also see the College Hub or ItsLearning pages for guidance on the college safeguarding procedure.

8. SUPPORTING LEARNERS 'AT RISK' AND EARLY HELP

8.1 Our College recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This college may be the only stable, secure and predictable element in the lives of children at risk. Whilst at college, their behaviour may still be challenging and defiant and there may even be moves to consider exclusion from college.

8.2 It is also recognised that some children and young people who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child or young person can receive appropriate help and support. Risk assessments will be reviewed and considered by the college in order to support and manage any risks for the learner, other learners, staff and for the College. These referrals must be sent to the Senior DSO for discussion with the Principal.

8.3 The college will endeavour to support students, especially those with disabilities, SEN, complex needs and belonging to a vulnerable group, through their learner journey and will provide support through the Pastoral Welfare Officer, Safeguarding Officers, Behaviour Support Officer, Student Safety Officer, Student and College Services Team, College Counsellor, Learning Support Team. The college with maintain a safe, inclusive and welcoming environment at the college. See the ***SEND Strategy***.

8.4 The College has in place various mechanisms for Early Help which can be accessed on-site. These include:

- A named Progress Tutor for each student who carries out weekly tutorials with students;
- A dedicated Pastoral Welfare Officer based in the HUB;
- Behaviour Support Officers and Student Safety Officers to support learners feel safe in and around college;
- A free counselling provision with a drop-in service;
- A dedicated Learning Support Team;
- Dedicated 'base rooms' that can be used as safe spaces;
- A team of DSOs;
- Mental Health First Aiders across the college;
- Social spaces and enrichment activities for students;
- College drop-in services such as sexual health, Drugs and Alcohol and CAMHS.

9. ONLINE SAFETY

9.1 Mobile phones and computers are a source of fun, entertainment, communication and education. However, some will use these technologies to harm others. This is more important than ever and college is increasing work online and young people should be protected from potentially harmful and inappropriate online material. The use of technology could increase risks of radicalization, sexual predation, CSE and CCE – it provides a platform that facilitates harm. The harm might range from sending hurtful or abusive texts and emails, to enticing young people or vulnerable adults to engage in sexually harmful conversations online, webcam filming, photography or face-to-face meetings. Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying policy and/ or disciplinary procedures.

9.2 Full guidance on bullying and disciplinary procedures can be found in the Colleges Acceptable Use Policy, Online Safety Policy, Bullying & Harassment Policy and Student Behaviour Support Policy.

10. RECORD KEEPING, CONFIDENTIALITY AND SHARING INFORMATION

10.1 Well-kept records are essential to good Child Protection practice. The college is clear about the need to record any concerns held about a student within the college, the status of such records and when these records, or parts thereof, should be shared with other agencies. There is also a need to share important education and any Child Protection information at the point of a child's transition to another education establishment.

10.2 Hopwood Hall College recognises that all matters relating to Safeguarding and Child Protection are confidential and all information will be stored and handled in line with Data Protection Act 1998 and the GDPR principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights; and
- secure.

10.3 Safeguarding referral information and safeguarding concerns and any other related sensitive information will be stored electronically on the students ILP ***ProMonitor*** and on **CPOMs –** the colleges system for recording and reporting on safeguarding and child protection concerns. Level of access to ProMonitor and CPOMs will be set according to the staff members role and remit. Information about a young person to others will be shared on a need to know basis only. All staff will have access to recording their concerns on Promonitor and CPOMs, however the PWOs and DSOs will be responsible for adding safeguarding concerns and monitoring actions and interventions. The DSOs will also manage safeguarding data and monitor interventions which are reported to SLT. This information on CPOMs is managed on a cloud based secure server accessed by key codes and two factor authentications. Promonitor operates on levels 1-3 which can only be accessed by allocated staff.

10.4 Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act and GDPR, which means that students and parents / legal guardians do not have an automatic right to see them. If any member of staff receives a request from a student or parent/ legal guardian to see safeguarding records, they will refer the request to the Data Protection Officer.

10.5 The ***Data Protection Act and GDPR does not prevent the sharing of safeguarding information with relevant agencies, where that information may help to protect or keep a young person safe.*** Full guidance can be found in the Colleges Data Protection and Information Sharing Policy. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

10.6 All staff must be aware that they cannot promise a child or young person to keep secrets which might

compromise the safety or wellbeing of a child or young person.

11. COMPLAINTS PROCEDURE

11.1 The Colleges Compliments and Complaints Policy procedure will be followed where a student or parent / legal guardian raises a concern about poor practice towards a student that initially does not reach the threshold for Safeguarding action. Compliments and complaints are managed by the Student and College Services Team. Full guidance on the complaint's procedure can be found in the colleges Complements and Complaint Procedure.

MONITORING AND EVALUATION

The College Senior Lead for Safeguarding will ensure that safeguarding reports and records are maintained securely and confidentially, that the College Senior Management Team, E&D Group and Governors are updated regularly on safeguarding incidents / reports made within college and that the Safeguarding and Child Protection Policy is reviewed annually and report to Governors and staff on relevant changes and updates.

DOCUMENTS ASSOCIATED WITH THIS POLICY

DOCUMENT REVIEW INFORMATION

Policy Date: 1st September 2021
Policy Author: Tracey Marrow
Date of SLT Sign Off: 14th September 2021
Equality Impact Assessment Completed? Yes
Equality Impact Assessment Date: 14th September 2021
Next Policy Review Date: 1st September 2022 or as new relevant guidance is issued, whichever is earlier.
Version Control: Version 1

APPENDIX

PART B: CHILD PROTECTION PROCEDURE

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1. What Should Staff/Volunteers Do If They Have Concerns About A Child, Young Person or Vulnerable Adult in the College?

Education professionals who are concerned about a child's welfare or who believe that a child is or may be at risk of abuse should pass any information to the Designated Safeguarding Officer **(DSO)** in the college; this should ***always*** occur as soon as possible and certainly within 24 hours.

The Designated Safeguarding Lead (DSL) is: Tracey Marrow

The SLT Safeguarding Lead is the college lead for dealing with staff allegations.

SPOC for Prevent and Channel is: Tracey Marrow

The Safeguarding Officers are: Katie Howarth, Laura Hilley, Zoe Keenan and Sadia Khan

The Senior Leadership Team Lead is: Caroline Street

The Pastoral Welfare Officers (PWOs) can act as Deputy SOs if required.

The Governor responsible for Safeguarding is:

It is these colleagues who are responsible for taking action where the welfare or safety of children or young people is concerned. If staff are uncertain about whether their concerns are indeed 'Child Protection' then a discussion with their direct line manager will assist in determining the most appropriate next course of action[3]:

Staff should never:

Do nothing
Assume that another agency or professional will act or is acting.
Attempt to resolve the matter themselves.

2. What should the DSO consider right at the outset?

1. Am I dealing with 'risk' or 'need'? (By definition, a child at risk is also a child in need. However, what is the *priority / level and immediacy* of risk / need and consider the Children's Needs and Response Framework?)

2. Can the level of need identified be met:
   - **a.** In or by the college or by accessing universal services/without referral to the Children Social Care or other targeted services?
   - **b.** By working with the child, parents and colleagues?
   - **c.** By completion of an **Early Help Assessment** with parents/carers/child & other professionals
   - **d.** Is a Children Social Care referral or other referral needed (e.g. channel)?

   - What resources are available to me/the college and what are their limitations?
   - Is the level of need such that a referral needs to be made to the Complex Early Help and Safeguarding Hub (EHASH) requesting that an assessment of need be undertaken? (**Section 17 Child in Need referral**)

[3] Detailed information on possible signs and symptoms of abuse can be found at **www.rbscb.org** in the Rochdale Borough Multi-Agency Safeguarding Children procedures.

- Is the level and/or likelihood of risk such that a Child Protection referral needs to be made (i.e. a child is suffering or is at risk of suffering significant harm? (**Section 47 Child Protection referral**)
- What information is available to me: Child, Parents, Family & Environment?
- What information is inaccessible and, potentially, how significant might this be?
- Who do/don't I need to speak to now and what do they need to know?
- Where can I access appropriate advice and/or support?
- If I am not going to refer, then what action am I going to take? (e.g. time-limited monitoring plan, discussion with parents or other professionals, recording, etc)
- Does **a Channel referral** need to be carried out?

3. Feedback to Staff Who Report Concerns to the Designated Safeguarding Officer: The Designated Safeguarding Officer will decide which information needs to be shared, when and with whom. The primary purpose of confidentiality in this context is to safeguard and promote the child's welfare.

4. Thresholds for Referral to the Complex Early Help and Safeguarding Hub (EHASH): Where a Designated Safeguarding Officer considers that a referral to the EHASH may be required, there are two thresholds for (and their criteria) and types of referral that need to be carefully considered:

Is this a Child In Need?
Under section 17 (s.17(10)) of the Children Act 1989, a child is in need if:

a. S/he is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
b. His/her health or development is likely to be impaired, or further impaired, without the provision of such services;
c. S/he has a disability

Is this a Child Protection Matter?

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

a. is the subject of an Emergency Protection Order;
b. is in Police Protection; or where they have
c. there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Therefore, it is the '**significant harm'** threshold that justifies statutory intervention into family life. A professional making a Child Protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm.

5. The Designated Safeguarding Officer will make judgment around 'significant harm', levels of need and when to refer. (Children's Needs and Response Framework)

6. Making Referrals to the EHASH (Guidance for the Designated Safeguarding Officer)

6.1 Child In Need/Section 17 Referrals The DSO should look with other services as part of the Early Help Strategy to complete an **Early Help Assessment** and copy this to: early.help@rochdale.gov.uk

a. This is a request for assessment/support/services and, as such, you ***must obtain the consent*** of the parent(s) (and child/young person where appropriate), this should be identified on the Early Help Assessment

b. Where a parent/child/young person refuses to consent, you should make clear your ongoing plans and responsibilities in respect of support, monitoring etc, and the possibility of a Child Protection referral at

some point in future if things deteriorate or do not improve. (This is not about threats or saying that this is inevitable but about openness and transparency in dealings with parents).

6.2 Child Protection Use the multi-agency referral form for referrals (MARF) to the Early Help and Safeguarding Hub where it is considered that a child may be at risk of or suffering significant harm. If an Early Help Assessment is in place then this information must form part of the CP referral and the DSO completes the front sheet of the multi-agency referral form.

a. You ***do not require the consent*** of a parent or child/young person to make a Child Protection referral

b. A parent should, ***under most circumstances, be informed*** by the referrer that a Child Protection referral is to be made. The criteria for not informing parents are:

I. Because this would increase the risk of significant harm to a child(ren), to another member in the family home or to a professional; or

II. Because, in the referrer's professional opinion, to do so might impede an investigation that may need to be undertaken;

III. Because there would be an undue delay caused by seeking consent which would not serve the child's best interests.

See the Rochdale Borough Multi-Agency Safeguarding Children procedures on the RBSCB website for the occasions when parents/carers should not be informed.

6.3 Fear of jeopardising a hard-won relationship with parents because of a need to refer is **not** sufficient justification for not telling them that you need to refer. To the contrary, this lack of openness will do little to foster ongoing trust, particularly as the source of referrals will be disclosed to parents except in a limited number of circumstances. If you feel that your own or another adult's immediate safety would be placed at risk by informing parents then you should seek advice and/or make this clear on the referral or in any telephone contact with the EHASH.

7. The EHASH Responses to Referrals and Timescales: In response to a referral, the EHASH may decide to:

- Provide advice to the referrer and/or child/family;
- Refer on to another agency who can provide services;
- Undertake an Assessment;
- Convene a Strategy Meeting for referrals under Section 47 of the Children Act;
- Provide support services under Section 17;
- Convene an Initial Child Protection Conference;
- Accommodate the child under Section 20 (with parental consent);
- Make an application to court for an Order;
- Suggest to referring agency that an Early Help Assessment be completed.

8. Feedback from the EHASH: The EHASH has 24 hours within which to make a decision about a course of action in response to a referral. If you do not receive any (same day) verbal feedback following an urgent Child Protection referral, and where this places the college / a child(ren) in a vulnerable position, you should ask to speak to the relevant Team Manager at EHASH (**0300 303 0440**) or the Out of Hours Service (**0300 303 8875**)

9. Vulnerable Adult Concerns: If the concern is regarding a vulnerable adult who maybe suffering harm, neglect or abuse, you must alert the DSO in the same way as you would for a child. The DSO will contact Rochdale's Adult Social Care team (0300 303 8886) and discuss the concerns. If appropriate, a referral

forms will be completed and sent to the Adult Social Care Team. See full protocols on the RBSAB Website: www.rbsab.org/professionals/multi-agency-policy-and-procedures

10. **Channel**: Concerns regarding radicalization or extremism are safeguarding concerns and the DSL Tracey Marrow must be contacted for concerns to be passed on. The DSL/SPOC for the College will make a referral into Channel and will await guidance on if the concern meets their thresholds. If appropriate, information on the student, their IT record and other information will be shared to assess risk and possible support required. Interventions can include a visit from the Channel Police or for the College to attend the Multi-Agency Channel Panel.

11. **Other Key Contacts:**
    - EHASH - Complex Early Help and Safeguarding Hub - Tel: 0300 303 0440
    - Out of Hours, Emergency Duty Social Work Team - Tel: 0300 303 8875
    - Education Safeguarding Officer - 01706 925179
    - Local Authority Designated Officer (LADO) - Tel: 0300 303 350
    - Safeguarding Unit – 0300 303 0350
    - Adult Safeguarding Team: - Tel: 0300 303 8866
    - Police: 101 or 999 (Emergency only)

12. **Risk Assessment 'Checklist'**
    - Does/could the suspected harm meet the RBSCB Safeguarding Children definitions of abuse?
    - Are there cultural, linguistic or disability issues?
    - Am I wrongly attributing something to an impairment?
    - Does the chronology indicate any possible patterns which could/do impact upon the level of risk?
    - Are any injuries or incidents acute, cumulative, episodic?
    - Did any injuries result from spontaneous action, neglect, or intent?
    - Explanations consistent with injuries/behaviour?
    - Severity and duration of any harm?
    - Effects upon the child's health/development?
    - Immediate/longer term effects?
    - Likelihood of recurrence?
    - Child's reaction?
    - Child's perception of the harm?
    - Child's needs, wishes and feelings?
    - Parents'/carers' attitudes/response to concerns?
    - How willing are they to co-operate?
    - What does the child mean to the family?
    - What role does the child play?
    - Possible effects of intervention?
    - Protective factors and strengths of/for child (i.e. resilience/vulnerability)
    - Familial strengths and weaknesses?
    - Possibilities? Probabilities?
    - When and how is the child at risk?
    - How imminent is any likely risk?
    - How grave are the possible consequences?
    - How safe is this child?
    - What are the risk assessment options?
    - What are the risk management options?
    - What is the interim plan?

APPENDIX 1: GLOSSARY OF KEY TERMINOLOGY

TERMINOLOGY:

a) Child(ren): Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

b) Vulnerable adult refers to someone who is, or may be in need of, care services by reason of mental or other disability, who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation;

***c)* Safeguarding and promoting the welfare of children:** Defined for the purposes of this guidance as: *(Keeping Children Safe in Education 2020).*

1. protecting children from maltreatment
2. preventing impairment of children's mental and physical health or development
3. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
4. taking action to enable all children to have the best outcomes

d) Child protection: part of safeguarding and promoting welfare and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

e) The difference between Safeguarding and Child Protection: Safeguarding is what we do for all children; and Child Protection is what we do for children or young people who have been harmed or are at significant risk of being harmed. This Policy includes the Child Protection Procedures, as well as links to other policies.

f) Staff: refers to all those working for or on behalf of the College, full time or part time, in either a paid or voluntary capacity. Staff includes ancillary supply and self-employed staff, contractors, volunteers working with children, and governors.

g) Looked After Child: sometimes referred to as 'LAC' is a child who is accommodated by the local authority; a child who is the subject of an Interim Care Order, Full Care Order or Emergency Protection Order; or a child who is remanded by a court into local authority accommodation or Youth Detention Accommodation. In addition, where a child is placed for Adoption or the local authority is authorised to place a child for adoption, the child is a Looked After Child. Looked After Children may be placed with parents, foster carers (including relatives and friends), in Children's Homes, in Secure Accommodation or with prospective adopters.

h) Care Leaver: a care leaver (CL) is someone who has previously been in care and is over 16 years old. Local Authorities have duties and powers to support LAC and Care Leavers as they move into independence.

i) Young Carer: A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment pursuant to a contract or as voluntary work).

j) Parent Carer: A person aged 18 or over who provides care for a disabled child for whom the person has parental responsibility.

k) Education, Health and Care Plan (EHCP): A single plan, which covers the education, health and social care needs of a child or young person with Special Educational Needs and Disability Care of Practice 2014.

l) **Local Authority Designated Officer (LADO):** the role where concerns where allegations against people who work with children are reported to. Any action necessary to address corresponding welfare concerns in relation to the child or children involved should be taken without delay and in a coordinated manner

m) **Contextual Safeguarding:** this is known as contextual safeguarding which means that assessment of children/young people should consider whether wider environmental factors are present in a child's life that are a threat to their safety and or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

DEFINITIONS[4]

a) **Abuse:** a form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. There are 4 main categories of abuse**: Physical, Neglect, Sexual and Emotional**:

b) **Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

c) **Neglect**: the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of the health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment;

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

***Self-neglect**:* this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Neglect and acts of omission - Neglect is the failure of any person who has responsibility for the charge, care or custody of an Adult to provide the amount and type of care that a reasonable person would be expected to provide.

d) **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. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

e) **Emotional Abuse:** the persistent emotional mal-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;

[4] Taken from Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children;
- Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

f) Financial Abuse: Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

g) Mental Health: refers to the emotional wellbeing of a person.

h) Adverse Childhood Experience (ACEs): ACEs are traumatic events that can have negative, lasting effects on health and wellbeing. These can include (but not limited to) abuse, neglect and household challenges such as domestic abuse, bereavement and substance misuse.

i) Sexual Violence and Sexual Harassment (Harmful Sexual Behaviours) and Peer on Peer abuse: All staff should be aware that children are capable of abusing their peers, including online (peer on peer abuse) and that this can happen both inside and outside of college.

All Staff should be aware of and able to recognise the signs, know how to identify and how to respond. All staff should be clear on the procedure and policy with regard to per on peer abuse.

It is essential that staff understand the importance of challenging inappropriate behaviours between peers, some of which are listed below. Downplaying certain behaviours as "just banter" "having a laugh" can lead to a culture of unacceptable behaviours and in worst cases can normalise abuse. Staff should be clear that the college will not tolerate this behaviour and must challenge and report such behaviours. Peer on peer abuse is most likely to include but limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm (this may include online elements such as threats)
- Sexual violence, such as rape by penetration and sexual assault (may include online element which facilities, threatens or encourages sexual violence)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves or engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of obtaining sexual gratification or humiliating, distress or alarm
- Initiation/hazing type violence and rituals (could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group – may also include an online element.

Staff should:

- act on any concerns they have, children don't always directly disclose. Concerns may arise with behaviour or overhearing a conversation that's suggests they may be at risk.
- be vigilant to interactions between peers and to 'corridor culture'.
- not minimize or tolerate inappropriate behaviours or language.
- Report immediately.

All staff should be able to reassure victims that they are being taken seriously and they will be supported and kept safe. A victim should never be made to feel they are a problem or feel ashamed for making a report.

j) Young people and vulnerable adults who may be particularly vulnerable or at greater risk of harm: Some students within the college have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some people to accept that abuse can occur.

Children potentially at greater risk of harm:

- **Children who need a social worker** (Child in Need and Child Protection Plans): Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

- **Children requiring mental health support:** schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

To ensure that all of our students receive equal protection, we will give special consideration to those who are:

- living away from home (including Looked After Children, Care Leavers);
- is returning home from care;
- children with social workers;
- young carers;
- young parents;
- those with poor mental health;
- those living with or have experienced ACEs;
- learners with disabilities or learning difficulties (LLDD);
- has special educational needs;
- showing signs of being drawn into anti-social or criminal behaviour;
- living in a domestic abuse situation;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- affected by parental substance misuse;
- asylum seekers;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- live transient lifestyles;
- have mental health issues;
- children in the court system;
- children missing education;
- children with family members in prison;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);

- country lines,
- domestic abuse;
- serious youth violence;
- homelessness;
- ‘honour-based’ abuse (so-called) - including female genital mutilation and forced marriage
- is a privately fostered child;
- living in chaotic and unsupportive home situations;
- peer on peer abuse;
- up skirting;
- sexual violence and sexual harassment;
- involved directly or indirectly in sexual exploitation including prostitution and/or trafficking;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or
- sexuality; and
- prevent and at risk of radicalisation or exploitation.

In addition to definitions provided above, the following terms are some important to note in the wider context of safeguarding and child protection (NB this is not a definitive list) – **specific safeguarding issues and vulnerabilities**:

- **Psychological Abuse:** Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

- **Child Sexual Exploitation (CSE):** CSE is a form of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activities including physical contact and/or non-contact sexual activities. CSE is a form of child abuse – it is not a child making an informed choice. This power imbalance can also be due to: age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it may happen without the child's immediate knowledge e.g. online, others sharing images or videos on social media.
- **Child Criminal Exploitation (CCE):** CCE involves children being manipulated or forced into undertaking criminal activities including: working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime, transporting drugs or money through County lines, threatening/committing serious violence to others.
  Children may become trapped, as they or their families are threatened with violence. They may be entrapped into debt or carrying weapons. They may carry a knife as a form of protection. **Children involved in criminal exploitation should be treated as victims, even though they may commit crimes themselves. Girls can also be the victims of CCE too.**

- **Discriminatory Abuse / Hate Crime:** Including racist, homophobic, transphobic and sexist abuse or harassment, abuse or harassment based on disability, faith abuse or other forms of harassment, slurs or similar treatment.

- **Domestic Abuse, Violence / Teenage relationship abuse:** ‘The behavior of a person (A) towards another person (B) is ‘domestic abuse’ if -
  A and B are aged 16 or over, are personally connected to each other and the behavior is abusive Behavior is abusive if it consists of any of the following- Physical or sexual abuse, violent or threatening

behavior, controlling or coercive behavior, economic abuse, psychological, emotional or other abuse. It does not matter whether the behavior consists of a single incident or a course of conduct. 'Personally connected' can be people that are intimate partners, ex-partners, family members. They do not need to live in the same household.

Recognition of the impact on children. Children that see or hear, experience the effects of domestic abuse and are related to the person being abused **are to be regarded as a victim of domestic abuse in their own right.** Exposure to domestic abuse and / or violence can have a serious and long lasting emotional and phycological impact on children and young people.

Operation Encompass. Operation Encompass operates in all police forces across England. It helps police and schools and colleges work together to provide emotional and practical help to children and young people. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the designated safeguarding lead) in college before the student(s) arrive at college the following day. This ensures that the college has up to date relevant information about the students' circumstances and can enable immediate support to be put in place, according to the child's needs. The DSL and Safeguarding Officers are trained in Operation Encompass procedures.

- **Online Safety:** The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:
  - **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
  - **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
  - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

  - **Cybercrime.** Cybercrime is criminal activity committed using computers and/or the internet. Cyber-dependant crimes include: unauthorised access to computers (illegal hacking, denial of service (Dos/DDos) attacks, making, supplying or obtaining malware (malicious software) such as viruses, ransomware, botnets and remote Access Trojans with the intent to commit further offences. Children with particular skills and interest in computers and technology may inadvertently stray into cyber-dependant crime. Further advice can be found at National Cyber centre – NCSC.GO.Uk

- **Preventing Radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

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

  - **Radicalisation:** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

  - **Terrorism:** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- **The Prevent duty:** colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

- **Channel:** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual’s engagement with the programme is entirely voluntary at all stages

- **Female Genital Mutilation (FGM):** involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. Can also include breast ironing. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon staff members, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

- **Honour Based Abuse (HBA):** So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage) So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. So-called 'honour-based abuse' is a fundamental abuse of Human Rights. There is no honour in the commission of murder, kidnap and the many other acts, behaviour and conduct which make up abuse in the name of honour.

- **Forced Marriage (FM):** where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an abuse of human rights and can involve other categories of abuse e.g. sexual, trafficking, slavery and exploitation and it can involve violence and HBV. Forced Marriage is not the same as an arranged marriage and it cannot be justified on religious or cultural grounds.

- **Fabricated or Induced Illness:** illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator. Local Safeguarding Children Boards have specific inter-agency procedures which cover this issue.

- **Bullying including cyberbullying:** behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

- **Sharing of nude or semi-nude images (formerly known as Sexting):** when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message.

- **Sexual Violence:** sexual offences under the Sexual Offences Act 2013 including rape, assault by penetration and sexual assault. Consent should be considered with an understanding that a child under the age of 13 can never consent.

- **Upskirting:** typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence

- **Sexual Harassment**: 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

- **Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, giving or receiving of payments or benefits, control over another for the purposes of exploitation.

- **Missing:** a child or young person missing from education is defined as someone of compulsory school age (18 or under) who is not on a school roll, not being educated otherwise (e.g. at home, in independent schools or in alternative provision) or who has been out of any educational provision for four weeks or more. Our college follows Rochdale Council CME guidance which outlines Rochdale Borough Council's systems for identifying and maintaining contact with children missing from education and the steps taken to identify those at risk.

- **Modern Slavery:** encompasses slavery, human trafficking and slavery, forced labour and domestic servitude. Exploitation can take many forms including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

- **Relationship Abuse:** unacceptable behaviour between two people. Relationship abuse can include violence, or physically forcing somebody to do something they don't want to but it can also be emotional and verbal, and could escalate to physical or sexual abuse.

- **Peer on Peer Abuse:** abuse that is carried out by one young person or vulnerable adult onto a peer. All staff should be clear as to the college's policy and procedures with regards to peer on peer abuse.
  All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse; sexual violence such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse; Upskirting; and initiation/hazing type violence and rituals. Allegations of abuse on peers will be fully investigated and not tolerated or passed off as "banter", 'just having a laugh' or 'part of growing up'.

- **Serious Violence:** All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. They are similar to CSE/CCE indicators: increased absences from college, significant decline in performance, a change in friendships or relationship with other individuals or groups, signs of self-harm or a significant change in wellbeing, 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. Staff should be aware of the risk factors which increase the likelihood of involvement in serious violence which are: Being male, frequent absence or permanently excluded, experienced child abuse or neglect and being involved in offending. See guidance on Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines.

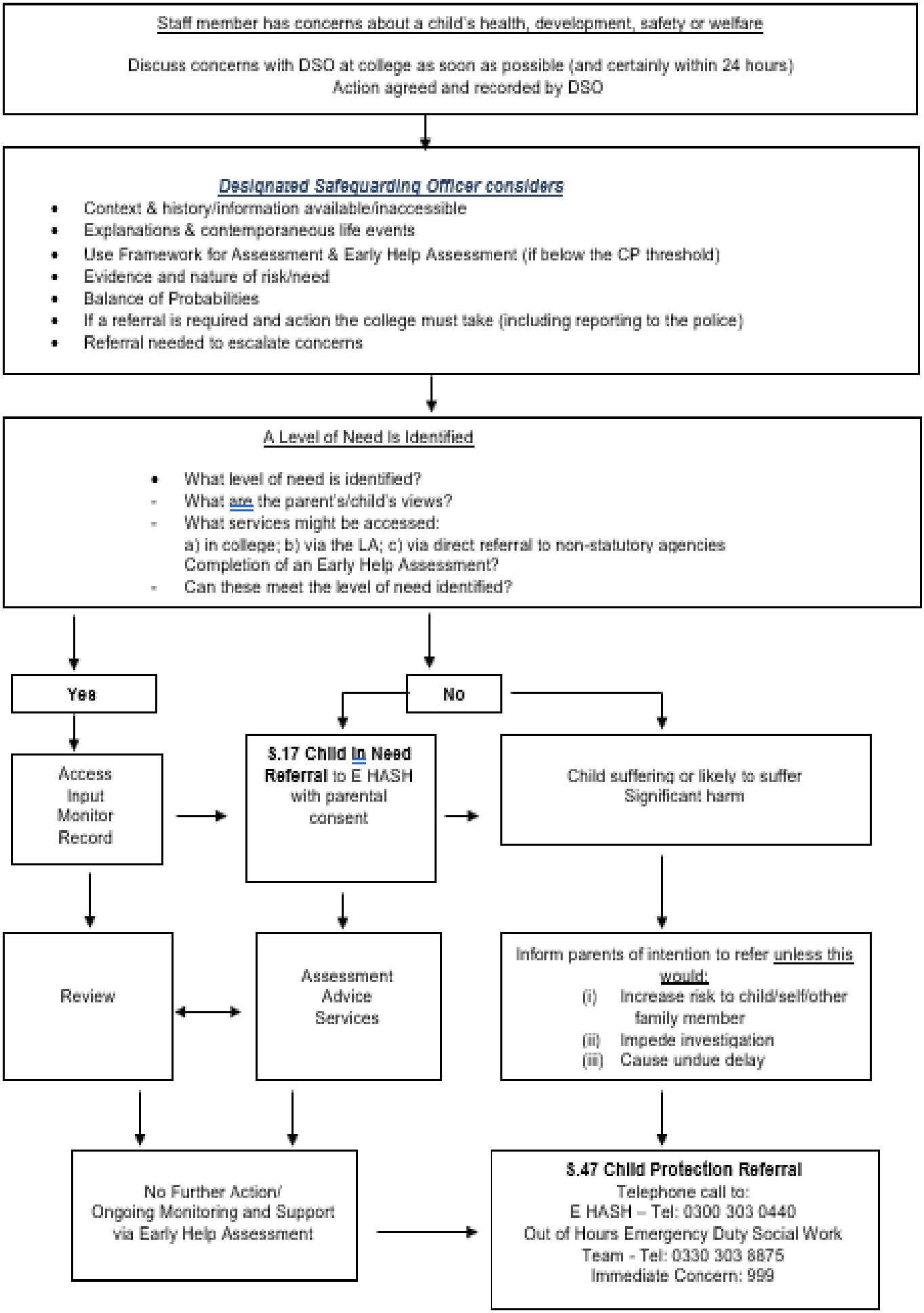
- **Gangs and Youth Violence:** Violence involving young people where they can be the victim, the perpetrator, or both. Youth violence includes aggressive behaviours such as verbal abuse, bullying, hitting, slapping, or fist fighting. These behaviours have significant consequences but do not generally result in serious injury or death. Youth violence also includes serious violent and delinquent acts such as aggravated assault, robbery, rape, and homicide, committed by and against youth.

- **County Lines:** a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

- **Restraint**: Unlawful or inappropriate use of restraint or physical interventions and/or deprivation of liberty is physical abuse. There is a distinction to be drawn between restraint, restriction, and deprivation of liberty. A judgement as to whether a person is being deprived of liberty will depend on the particular circumstances of the case, considering the degree of intensity, type of restriction, duration, the effect and the manner of the implementation of the measure in question.

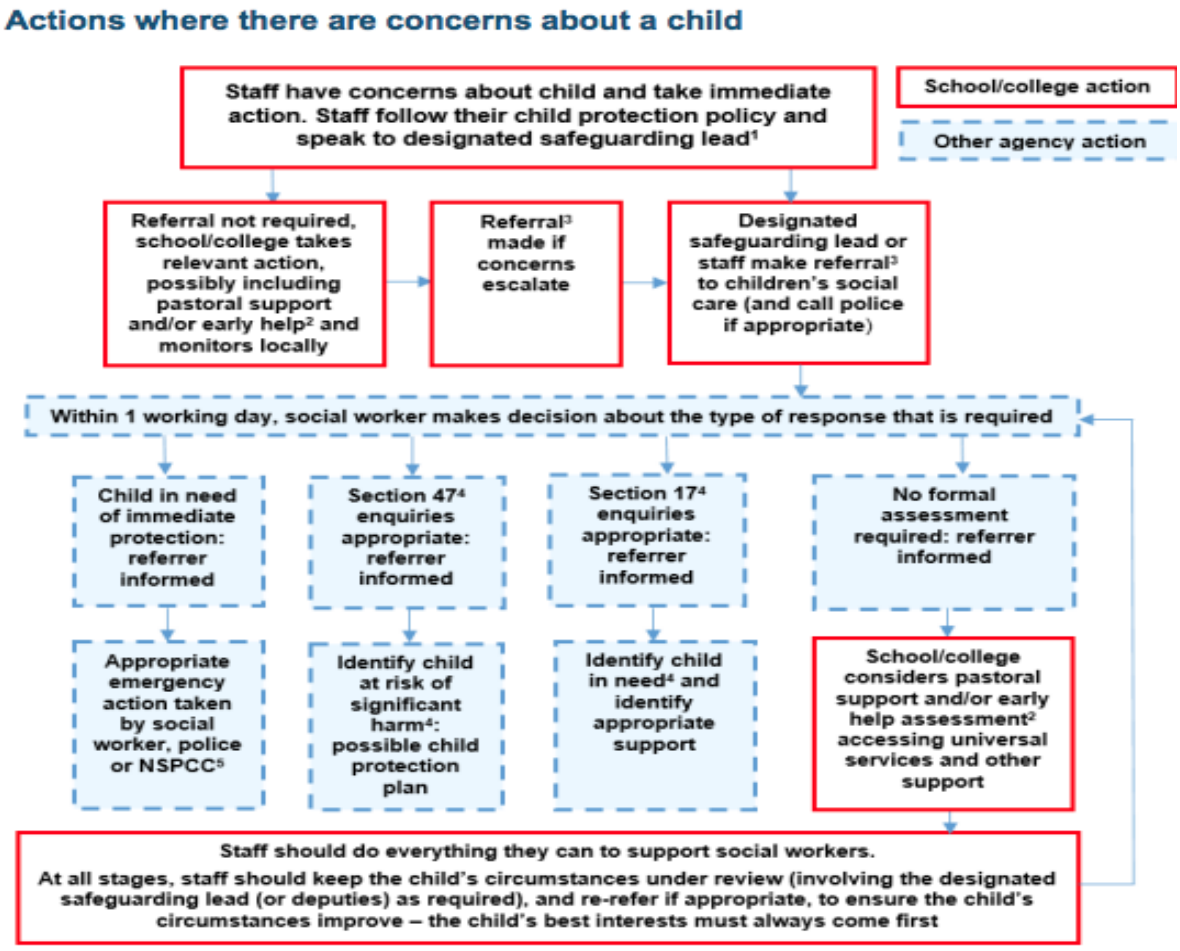
- **Contextual safeguarding**: Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside the college. All staff, but especially the designated safeguarding leads should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

APPENDIX 2: TAKING ACTION ON CHILD/YOUNG PERSON WELFARE/PROTECTION CONCERNS IN COLLEGE/THE WORKPLACE


Staff member has concerns about a child's health, development, safety or welfare
Discuss concerns with DSO at college as soon as possible (and certainly within 24 hours)
Action agreed and recorded by DSO
Designated Safeguarding Officer considers
Context & history/information available/inaccessible
Explanations & contemporaneous life events
Use Framework for Assessment & Early Help Assessment (if below the CP threshold)
Evidence and nature of risk/need
Balance of Probabilities
If a referral is required and action the college must take (including reporting to the police)
Referral needed to escalate concerns
A Level of Need Is Identified
What level of need is identified?
What are the parent's/child's views?
What services might be accessed:
a) in college; b) via the LA; c) via direct referral to non-statutory agencies
Completion of an Early Help Assessment?
Can these meet the level of need identified?
Yes
No
Access
Input
Monitor
Record
S.17 Child In Need Referral to E HASH with parental consent
Child suffering or likely to suffer Significant harm
Review
Assessment
Advice
Services
Inform parents of intention to refer unless this would:
(i) Increase risk to child/self/other family member
(ii) Impede investigation
(iii) Cause undue delay
No Further Action/
Ongoing Monitoring and Support
via Early Help Assessment
S.47 Child Protection Referral
Telephone call to:
E HASH – Tel: 0300 303 0440
Out of Hours Emergency Duty Social Work Team - Tel: 0330 303 8875
Immediate Concern: 999

The Designated Safeguarding Officers are: Tracey Marrow, Katie Howarth, Laura Hilley, Sadia Khan

The SLT Safeguarding Lead is: Caroline Street. PWOs could also stand and deputy DSOs



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

Taken from 'Keeping children Safe in Education 2020', DFE Statutory Guidance

Basic Needs Triangle

APPENDIX 3: TALKING AND LISTENING TO YOUNG PEOPLE OR VULNERABLE ADULT

If a child/VA wants to confide in you, you *SHOULD*

- Be accessible and receptive;
- Listen carefully and uncritically, at the child's pace;
- Take what is said seriously;
- Reassure children that they are right to tell;
- Tell the child that you must share the information;
- Make sure that the child is ok;
- Make a careful record of what was said (see *Recording*).

You should NEVER

- Investigate or seek to prove or disprove possible abuse;
- Investigate, suggest or probe for information;
- Ask leading questions of children/young people
- Confront another person (adult or child) allegedly involved;
- Speculate or accuse anybody;
- Make promises about confidentiality or keeping 'secrets';
- Assume that someone else will take the necessary action;
- Jump to conclusions, be dismissive or react with shock, anger, horror, etc;
- Offer opinions about what is being said or the persons allegedly involved;
- Forget to record what you have been told;
- Fail to share the information with the correct person (the Designated Safeguarding Lead).

Learners with communication difficulties, or who use alternative/augmentative communication systems

- While extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in exactly the same manner as for other children;
- opinion and interpretation will be crucial (be prepared to be asked about the basis for it and to possibly have its validity questioned if the matter goes to court).

Recordings should

- State who was present, time, date and place (using full names and full job designation of staff);
- Be written in ink and be signed by the recorder;
- Be passed to the DSO, Safeguarding Officers or Senior DSO immediately (certainly within 24 hours);
- Use the child's words wherever possible;
- Be factual/state exactly what was said;
- Reported on CPOMs;
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation.

What information do you need to obtain?

- Colleges have **no investigative role** in Child Protection (Police and Children's Social Care will investigate possible abuse very thoroughly and in great detail, they will gather evidence and test hypotheses – leave this to them!);
- Never prompt or probe for information, your job is to listen, record and share information;
- Ideally, you should be clear about what is being said in terms of **who, what, where and when;**
- The question which you should be able to answer at the end of the listening process is 'might this be a Child Protection matter?';

- If the answer is yes, or if you're not sure, record and share immediately with the DSO, Senior DSO, SMT SG Officer, Principal or line manager.

If you do need to ask questions, what is and isn't OK?

- **Never** asked closed questions i.e. ones which children can answer yes or no to e.g. Did he touch you?
- **Never** make suggestions about who, how or where someone is alleged to have touched, hit etc e.g. Top or bottom, front or back?
- If we must, use only '**minimal prompts**' such as 'go on … tell me more about that … tell me everything that you remember about that … … '
- Timescales are very important: '**When was the last time this happened?**' is an important question.

What else should we think about in relation to disclosure?

- Is there a place in college which is particularly suitable for listening to children e.g. not too isolated, easily supervised, quiet etc;
- We need to think carefully about our own body language – how we present will dictate how comfortable a child feels in telling us about something which may be extremely frightening, difficult and personal;
- Be prepared to answer the 'what happens next' question;
- We should never make face-value judgements or assumptions about individual children. For example, we 'know that [child…….] tells lies';
- Think about how you might react if a child DID approach you in college. We need to be prepared to offer a child in this position exactly what they need in terms of protection, reassurance, calmness and objectivity;

Think about what support **you** could access if faced with this kind of situation in the college.

APPENDIX 4: SUMMARY OF KEY CHANGES FROM LAST YEARS POLICY

New guidance from Keeping Childing Safe in Education 2021 has been added to the policy which has resulted in a number of key changes:

- Inclusion of Child on Child sexual violence and sexual harassment highlighting:
  the importance of acknowledging and understanding the scale of harassment and abuse.
  Makes clear it can happen inside and outside of college.
  Highlights zero tolerance
  How college respond to an incident, also making it clear that young people do not always tell someone, staff may overhear or be concerned about their behavior.
  Further information about resources and signposting
- Updated explanation on Peer on peer abuse – highlighting importance and staff recognizing and reporting
- Serious violence. Updated with indicators and risk factors.
- Domestic Abuse updated information and explanation inc. **Operation Encompass** information.
- Updated information on Child criminal exploitation (CCE) and Child Sexual exploitation (CSE)
- Cyber-crime. New paragraphs added.
- Modern Slavery – clearer explanation.
- Removal of the guidance from Coronavirus (Covid-19)
- Additional information to make it clear that victims should be taken seriously and never made to feel they are creating a problem or a nuisance.

- **Terminology changes:**
  - Clearer explanation of Child Criminal Exploitation (CCE) and includes the similarities with CCE and CSE.
  - Guidance and change of terminology for sexting to 'Sharing of nude and semi-nude images.
  - Updated explanation on preventing radicalization
  - Changes to DSL role and responsibilities and added Safeguarding Officers (SO) roles and responsibilities.
  - Children with a social worker added to the list of children who are vulnerable / at greater risk of harm. This group is added to the DSLs monitoring responsibilities.
  - Part 1: key information for all staff has been updated to reflect the above points.

Other enhancements to previous changes to the policy to reflect the changes in the college:

- Updated with the new Safeguarding Team structure and pastoral welfare team
- Included names and roles of 4x Safeguarding Officers
- Inclusion of the HUB – for staff to refer pastoral support to the Pastoral, Welfare & Safeguarding Team
- Updated referral, reporting and storing information including on CPOMs – our new child protection online monitoring system.
- Included Mental Health and ACEs within the policy to reflect the trauma informed work ongoing at the college
- Safeguarding governor: Steve Taylor
- Contact details and telephone numbers updated
- Updated details on key policy documents including:
  - Behaviour Support Policy
  - Online Safety Policy
  - SEND Strategy
  - Tutorial Policy
  - Speaking Out Policy
  - Prevent Strategy