

AWARD-WINNING EDUCATION

HOPWOOD HALL COLLEGE
**Safeguarding
and Child
Protection Policy**

2025 - 2026



Policy Cover Sheet

Please fill in the following details:

Policy Name	Safeguarding and Child Protection Policy
Version Number	V4
Policy Owner	Tracey Marrow
Release Date	September 2025
Policy valid for	1 year

Documents included:

Completed Checklist (below)	X
Policy text	X
Filled in EIA	X

Where should this policy be shared? All policies will be shared on the HUB.

The HUB	X
Net Consent	X
Website	X

Policy Checklist

Have you completed the following tasks:

Used the Microsoft Accessibility Checker	X
Used formatted headings	X
Used Arial 12pt font	N
Included numbered paragraphs	X
Included page numbers	X
Included alternative text for all images which accurately describe what's in the picture	X
Checked for gender neutral language e.g. remove dinner ladies, workmen, he/she and replaced with servers, contractors, they.	X
Used the full phrase instead of the acronym at least the first time	X
Used the spelling and grammar check	X
Gained feedback from colleagues to ensure the policy is clear and accurate	X
Included any legal, social or organisational changes since the last policy review	X
Reviewed the connected policies to ensure they are still active	X
Filled in the change log	X
Listened to the policy using the accessible reader	X
Reviewed the policy flowchart	X
Informed the EDI Manager of upcoming policy deadlines	X

Sign Off: To be filled in by the named person only

	Name	Date
SLT	Lisa Woodman	Sept 2025
Corporation (if required)		
Trade Union		
EIA	Adam Carney	Sept 2025

Change log

Version number	Changes description	Major changes? Y/N	Initiator	Rationale	Date of completion	New version number
V4	Roles and names updated	N	Tracey Marrow	Restructure and role name changes recruitment of new staff and external partners	August 2025	4
V4	Legislation, guidelines and policies	N	Tracey Marrow	All updated to latest versions	August 2025	4
V4	Equality Statement added to scope	N	Tracey Marrow	Local Authority requirement	August 2025	4
V4	Roles of DSL, Governing body updated	N	Tracey Marrow	KCSIE 2025	August 2025	4
V4	Online safety updated with expanded definitions of harm: Misinformation, disinformation, (Fake news) and conspiracy theories	N	Tracey Marrow	KCSIE 2025	August 2025	4
V4	Statutory Attendance Guidance	Y	Tracey Marrow	Attendance guidance now statutory	August 2025	4
V4	Whole Policy aligned with Rochdale LA Guidelines	N	Tracey Marrow	Rochdale Local Authority guidance for schools and colleges	August 2025	4

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Worried About a Child?

All reports or enquiries concerning the welfare or safety of a child must go straight to EHASH via the Portal [Rochdale Safeguarding Partnership - Children's Services Portal](#) as the first option or on 0300 303 0440. This applies to reports from council staff, the public, partners and outside agencies. All referrals are then to be sent to ehash@rochdale.gov.uk

If a child is in immediate danger of being harmed, or if a child is home alone, the police should be called on 999

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Tracey Marrow	01616556916 07796116535 tracey.marrow@hopwood.ac.uk
SLT Safeguarding Lead	Lisa Woodman	01616556966 07949766987 Lisa.woodman@hopwood.ac.uk
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Chair of governors	Gary Buxton	C/O Fatima.hussein@hopwood.ac.uk
Safeguarding link governor	Steve Taylor	steve.taylor@nca.nhs.uk
Local authority designated officer (LADO) for allegations against professionals	Louise Hurst	0300 3030350 Louise.hurst@rochdale.gov.uk
Education safeguarding officer	Hayley Reynolds	01706 925179 hayley.reynolds@rochdale.gov.uk
EHASH	Multi agency complex early help and safeguarding hub	0300 303 0440 Out of Hours 0300 303 8875
LA Prevent officer	Muhammad Abdulaleem	01706 926437 muhammad.abdulaleem@rochdale.gov.uk

ROLE	NAME	CONTACT DETAILS
Headteacher for the virtual school	Kirstie Rathbone	01706 925126 Kirstie.rathbone@rochdale.gov.uk
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1. INTRODUCTION

1.1. Hopwood Hall College has a moral and statutory duty to safeguard and promote the mental and physical welfare of all its learners and fully recognises the contribution it can make to protect and support them. The College will endeavour to create and maintain a safe and welcoming learning environment 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. Underpinning legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping children safe in education - GOV.UK](#); [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#) and the [Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners via Rochdale Borough Safeguarding Children Partnership (RBSCP).

Local safeguarding partners, are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They are responsible for child protection policy, procedure and guidance at a local level.

The local safeguarding arrangements are led by three statutory safeguarding partners:

- the local authority
- the integrated care board (ICB, previously clinical commissioning group or 'CCG')
- the police.

In line with RBSCP requirements, we adhere to Greater Manchester multi-agency safeguarding procedures [Welcome to the Greater Manchester Safeguarding Children...](#) and the Rochdale Multi-Agency Response to Need Guidance, that can be found here; [Rochdale Safeguarding Partnership - Assessment Tools, Forms, Templates & Other Resources](#)

○

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the

rights which apply to individuals under the [European Convention on Human Rights \(ECHR\)](#)

➤ [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment. [Equality Act Advice Final.pdf \(publishing.service.gov.uk\)](#)

➤ [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

1.3. 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.

1.4. This policy must be read in conjunction with other college policies specified at the end of this document.

2. SCOPE

2.1. This policy applies to all adults: staff including temporary¹, 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.

2.2. Some children have increased vulnerabilities, and additional barriers can exist for some children with respect to recognising or disclosing abuse or harm or exploitation. We are committed to actively promoting anti-discriminatory practice and aim to recognise and respond appropriately to children's diverse circumstances. We ensure that all children are afforded protection, regardless of any barriers they may face. We give special consideration to children who:

Have special educational needs (SEN) or disabilities or health conditions

Are young carers

May experience discrimination due to their age, disability, sexual orientation, sex, gender, race, religion and belief. (Which are deemed as protected characteristics within the Equality Act, 2010)

Have English as an additional language

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

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse

Are at risk of female genital mutilation, sexual or criminal exploitation, 'honour based' violence or abuse, forced marriage, or radicalisation

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs

Have a social worker (see section 11)

Are looked after or previously looked after (see section 12)

Are absent or missing from home or education repeatedly and / or for prolonged periods

Whose parent/carer has expressed an intention to remove them from school to be home educated

Staff at our college will provide safe spaces for all students, including those with protected characteristics, to speak out and share concerns.

3. AIM

➤ We recognise that safeguarding and promoting the welfare of children is everybody's responsibility and that the best interests of the child are paramount. As everyone who comes into contact with children and their families has a vital role to play, this policy has been developed to provide a shared understanding of expectations. We maintain an attitude that 'it could happen here' where safeguarding is concerned therefore, the school aims to ensure that:

3.1. Appropriate action is taken in a timely manner to safeguard and promote children's welfare

3.2. All staff are aware of (and feel confident to exercise) their statutory responsibilities with respect to safeguarding

➤ We have a skilled and knowledgeable workforce who are properly training in recognising and reporting safeguarding issues and who understand local early help processes where this would be more beneficial.

3.3. As defined in ***Working Together to Safeguard Children (2023)***:

Safeguarding and promoting the welfare of children is defines as:

➤ Providing help and support to meet the needs of children as soon as problems emerge

➤ Protecting children from maltreatment, whether that is within or outside the home, including online

➤ Preventing impairment of children's mental and physical health or development

➤ Ensuring children grow up in circumstances consistent with provision of safe and effective care

➤ Promoting the upbringing of children with their birth parents, or otherwise their family network through kinship care arrangement, whenever possible and where this is in the best interests of the children

- Tackling action to enable all children to have the best outcomes in line with outcomes set out in the Children's Social Care National Framework [Children's social care: national framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/childrens-social-care-national-framework)

4. ROLES AND RESPONSIBILITIES

4.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

4.2. Our college is committed to playing a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

Behaviour policy

Safeguarding, Wellbeing and Pastoral support systems

4.3. Planned programme of relationships, sex and health education (RHE/RSHE), appropriate to the age and developmental stage of our children, which is inclusive and delivered regularly, tackling issues such as:

Healthy and respectful relationships

Boundaries and consent

Stereotyping, prejudice and equality

Body confidence and self-esteem

The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as Honour based violence and abuse (HBVA), forced marriage and female genital mutilation (FGM) and how to access support

How to recognise an abusive relationship

What constitutes sexual harassment and sexual violence and why they're always unacceptable

4.4. All staff

To ensure all members of our college community fully understand their safeguarding responsibilities, it is our expectation that staff read and ensure they understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping children safe in education - GOV.UK](https://www.gov.uk/government/publications/keeping-children-safe-in-education) and review this guidance at least annually.

There may however, be limited circumstances where senior leadership determine that an individual staff member or group of staff would obtain a better understanding of their safeguarding responsibilities by instead reading the condensed version of part 1, which is held at Annex A of [Keeping children safe in education - GOV.UK](https://www.gov.uk/government/publications/keeping-children-safe-in-education) This would only be appropriate in exceptional circumstances, following approval by the Governing Board and with additional training provided to supplement and reinforce key messages to these staff groups.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. All staff will be aware of:

- 4.4.1 Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (Professional Guidelines), the role and identity of the Designated Safeguarding Lead (DSL) and deputies (DDSL's), the behaviour policy, the attendance policy and the safeguarding response to children who go missing from education.
 - 4.4.2 The safeguarding response to children who are absent from education, particularly on repeat or prolonged occasions and/or prolonged periods, (see also the Attendance Policy).
 - 4.4.3 The early help assessment process and their role in it, including identifying emerging needs, liaising with the DSL, and sharing information with other professionals to enable the right support to be offered to learners' families at the earliest opportunity. The process for making referrals to local authority Local Authority Children's Social care and for statutory assessments that may follow a referral, including the role they might be expected to play
 - 4.4.5 What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
 - 4.4.6 The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
 - 4.4.7 The importance of reassuring victims is that they are being taken seriously and that they will be supported and kept safe.
 - 4.4.8 The fact that children can be at risk of harm inside and outside of their home, at school and online and that disclosure is rarely a straightforward process.
 - 4.4.9 The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or transgender (LGBT) or those with other protected characteristics, can be targeted by other children
 - 4.4.10 What to look for, including non-verbal disclosures, to identify children who need help or protection
 - 4.4.11 All staff receive appropriate safeguarding and child protection training (including online safety which includes roles and responsibilities in relation to filtering and monitoring) at induction. This training to be updated as appropriate at least every 2 years. In addition, **all** staff should receive regular safeguarding updates to continue to provide them with relevant knowledge to safeguarding effectively.
- 4.5. **Designated Safeguarding Lead.** College has named Tracey Marrow Head of Safeguarding and Wellbeing as Designated Safeguarding Lead (DSL) and Lisa Woodman Executive Director for People, Culture and Wellbeing as a member of the Senior Leadership Team with lead responsibility for Safeguarding and Child Protection. DSL has lead responsibility of safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place).

We recognise the highly challenging role of DSL and will ensure our DSL has time, funding, ongoing training and professional development opportunities, adequate resources and wider support to:

- Provide advice, support and their expertise to other staff on child welfare and child protection matters.
- Have 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 and radicalisation.
- Ensuring and maintaining clear and confidential records of safeguarding and child protection concerns, actions and planning. Hold and share relevant information in line with relevant data protection legislation.
- Act as a point of contact for partner agencies.
- Promote positive relationships with parents and families and support their ability to fully engage in the processes in order to uphold the welfare of their children, even when families may be facing difficult and challenging situations.
- Have a good understanding of harmful sexual behaviour in children and local pathways to access advice, undertake safety planning and support all children involved. [hsb guidance document rbscp.docx april 23 f.pdf](#)
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Know who our cohort of children who have or had have a social worker are, and promote a culture of high aspiration for this cohort as well as champion reasonable adjustments to make sure they reach their potential.
- Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Liaise and keep the Principal informed of safeguarding issues, especially ongoing enquiries under Section 47 of the children Act 1989 and any police investigation. This includes being aware of the requirement for children to have an Appropriate Adult.
- 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 DDSLs, and by all staff and governors, number and type of incidents / cases, and number of children on the child protection register.
- Receive Advanced Safeguarding Training at least every 2 years.
- Keep up to date with developments in safeguarding issues
- That the full responsibilities of the DSL and DDSLs are set out in their job descriptions.

4.6. The Deputy Designated Safeguarding Leads (Safeguarding and Wellbeing Leads)

- Receive training in safeguarding and inter-agency work, to the same standard as the DSL.
- Undertake training as required by RBSCB and will receive refresher training at least every year and Advanced Safeguarding training every 2 years.
- Attend Strategy meetings and contribute to the Section 47 assessment of children process.
- Know how to receive and make an appropriate referral.
- Ensure college records are maintained, up to date and confidential.
- 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 DDSLs and a statement explaining the college's role in referring to and monitoring cases of suspected abuse is clearly advertised in the college and are a part of student induction.
- Support the DSL with college-wide staff training.
- Support the Designated Person for Looked After Children (LAC) and Care Leavers and have responsibility for liaising with the Local Authority Personal Advisor for any issue of concern affected LACs or Care Leavers
- Support the DSL with referrals to Channel.
- Responsible for High-Risk students
- Ensure the wider Safeguarding and Wellbeing Team carry out their safeguarding roles according to policy and guidelines.

4.7. The Governing body will:

- Receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in college are effective and support the delivery of a robust whole college approach to safeguarding ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Their training should be updated every two years.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Provide appropriate oversight and challenge to ensure college have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and ensure an annual review of these procedures takes place to keep up with evolving cyber-crime technologies.
- Appoint a link Governor to monitor the effectiveness of this policy in conjunction with the full governing board.

They will ensure that:

- The DSL has the appropriate status and authority to carry out their job, including time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-college approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The college has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- there is a staff behaviour and conduct policy in place (Professional Guidelines for Staff);
- the College operates safer 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.

- 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.
- Ensures **that appropriate safeguarding arrangements** in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- The chair of governors will act as 'case manager' in the event of an allegation of abuse made against the Principal.
- Enhanced DBS checks are in place for Governors.
- Appoint a **Designated Governor for Safeguarding**. Steve Taylor currently undertakes the role.
- the **College Principal** has overall responsibility for Safeguarding and Child Protection and will ensure that reports to Governors are made at least annually.
- All governors will read Keeping Children Safe in Education in its entirety.

4.8. **The Principal** is responsible for the implementation of this policy, including:

- Ensuring staff (including temporary staff) and volunteers are informed of systems which support safeguarding including this policy ensure and the Staff code of conduct (Professional Guidelines) are followed.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate DSL cover.
- Ensure that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Liaise with the DSL where an allegation is made against a member of staff.
- ensure that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.
- ensure that the college/school has a clear line of accountability in their individual college/school for the management and supervision of safeguarding and child protection; to ensure staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of students in order that staff members feel able to raise concerns about a student.

4.9. **The Safeguarding and Wellbeing Mentors (SWM) will:**

Act as **DDSL** for the College in the absence of a member of the main Safeguarding Team. SWMs 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 SWMs will assume all of the functions above. The SWMs will be based out of the HUB and will provide early help and support to learners for a range of safeguarding, pastoral, welfare, wellbeing, and mental health concerns.

5. PROCEDURES for Disclosures of Abuse, Neglect and Exploitation.

- 5.1. A member of staff may have suspicions that a student is being abused or is at risk of significant harm. Staff should recognise that: there may be difficulty for young people and vulnerable adults in sharing that there is abuse happening to them or that they may not recognise what they have shared may be identified as harmful. This should not stop

staff from remaining professionally curious and referring their concerns to DSL/DDSL's for further investigation.

- 5.2. A student may also disclose to a member of staff that they are being abused. In these circumstances, the procedure outlined below should be followed.
- 5.3. Staff should report any concerns, suspicions or disclosures immediately to one of the Designated Safeguarding Officers via the dedicated telephone numbers or 07850 323 664, 07903680819, 07496387321 and email address safeguarding@hopwood.ac.uk. All staff will also have access to Promonitor.
- 5.4. 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.
 - Write up your conversation as soon as possible, using the students' own words. Record facts, be clear if you are stating your professional opinion. Include information about impact on the child – e.g. if they are tearful, appear anxious, appear unaffected. Ensure details are precise – date, time, location and give context including what happened prior to the disclosure, was there an identified trigger etc.
 - Reassure them that by telling a member of staff, they have done the right thing. Do not promise to keep it a secret.
 - Explain what will happen next - 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 DDSL via the dedicated safeguarding telephone numbers as soon as possible and always within 24 hours.

Bear in mind that disclosure is rarely straightforward and some children may:

- Not feel ready, or be able to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- None of this should stop you from having 'professional curiosity' and speaking to the DSL if you have concerns about a child.

5.5. The DSL will consider:

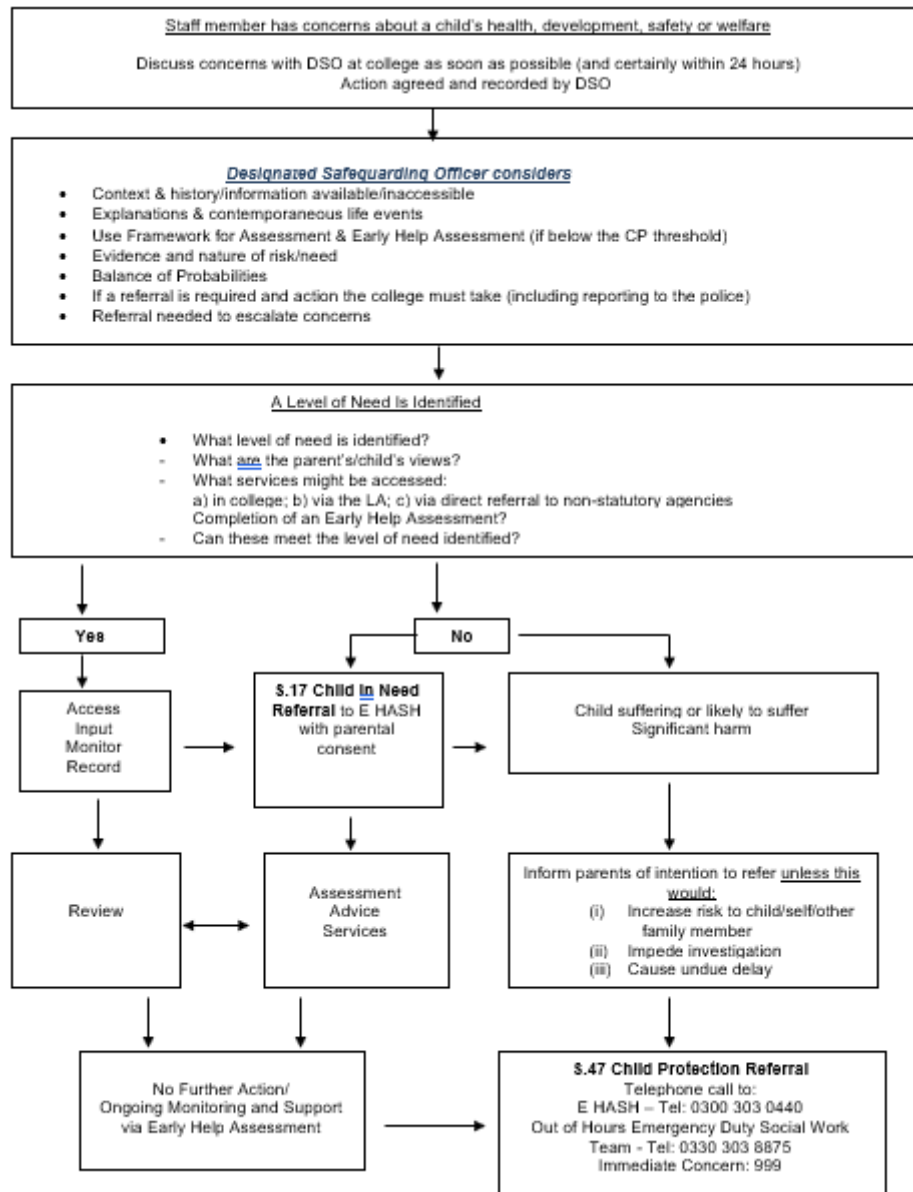
Are we dealing with 'risk' or 'need'? (By definition, a child at risk is also a child in need. However, what is the *priority / level and immediacy* of risk / need [considering](#) the Children's Needs and Response Framework?)

Can the level of need identified be met?

In or by the college or by accessing universal services/without referral to the Children Social Care or other targeted services?

- By working with the child, parents and colleagues?
- By completion of an **Early Help Assessment** with parents/carers/child & other professionals?

Is a Children Social Care referral or other referral needed (e.g. channel)?
 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)



6. THRESHOLDS FOR REFERRAL to COMPLEX EARLY HELP AND SAFEGUARDING HUB (EHASH)

6.1. If a child is suffering from or likely to suffer from significant harm, or in danger:

Within college, referrals should usually be made via the DSL/DDSL, who is the person with the complete safeguarding picture in relation to children. Therefore, if you believe a

child is suffering or likely to suffer from significant harm, you should **immediately** locate the DSL in person to share this information.

In the event that the DSL is unavailable, or if a child is in immediate danger, make a referral to children's social care and/or the police **immediately**. **Anyone can make a referral**. Tell the DSL as soon as possible if you make a referral directly.

- 6.2. Referrals to children's social care in Rochdale should be made via the Children's Services Portal in the first instance, however if there are difficulties, calls to the Complex Early Help and Safeguarding Hub (EHASH) on 0300 303 0440 can be made. [Rochdale Safeguarding Partnership - Children's Services Portal](#)

Further information can be found at [Rochdale LA website - reporting concerns about a child](#)

- 6.3. **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.

6.4. **If you have a concern about a vulnerable adult**

If the concern is regarding a vulnerable adult who maybe suffering harm, neglect or abuse, you must alert the DDSL in the same way as you would for a child. The DDSL 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

6.5. **If you discover that so called honour-based abuse is or has taken place, if FGM has taken place or a student is at risk of FGM**

Honour-based Abuse and Violence (HBAV) 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 (FM), 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 HBAV 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 HBAV, or already having suffered HBAV.

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix I of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Teachers are able to obtain support from the DSL, who will also contact the EHASH, or support the teacher to do so.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must immediately speak to the DSL, who will contact Police and EHASH.

Staff must never examine students.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures held at; [RBSCP multi agency FGM procedure](#).

6.6. If you have a concern about extremism: If the student is not suffering or likely to suffer from harm or in imminent danger, where possible speak to the DSL first to agree the course of action. In exceptional circumstances if DSL is not available speak to senior Safeguarding lead or a DDSL and/or seek advice from local authority Local Authority Children's Social care. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's program for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority Local Authority Children's Social care team. Schools can seek advice and guidance from the Local Authority Equality and Community Cohesion Officer, **Muhammad Abdulaleem on 01706 926437**.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

6.6. If you have a mental health concern: 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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and contact the DSL/DDSL

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL/DDSL/SWM or any member of the Safeguarding and Wellbeing Team to agree

a course of action, which may include referral to local support services or additional pastoral support within school.

7. EARLY HELP

- 7.1. All staff should be prepared to identify students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in the student's time with us at college.
- 7.2. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
- Is disabled or has certain health conditions and has specific additional needs.
 - Has special educational needs (whether or not they have a statutory education, health and care plan EHCP).
 - Has a mental health concern.
 - Is a young carer.
 - Shows indications of involvement in anti-social or criminal activity, including gangs or organised crime groups.
 - Is frequently missing/goes missing from care or from home.
 - Is at risk of modern slavery, trafficking, sexual or criminal exploitation
 - Is at risk of being radicalised or exploited.
 - Has a family member in prison or is affected by parental offending.
 - Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
 - Is misusing drugs or alcohol themselves.
 - Has returned home to their family from care.
 - Is at risk of so called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
 - Is a privately fostered child.
 - Is persistently absent from education, including persistent absences for part of the school day.
- 7.3. Staff may be required to support other agencies and professionals in an early help assessment. Any such cases will be managed by the DSL/DDSL and will be kept under constant review and consideration given to a referral to Local Authority Children's Social care for assessment for statutory services if the student does not appear to be improving or is getting worse.
- 7.4. The College has in place various mechanisms for Early Help which can be accessed on-site. These include:
- A named Personal Development Tutor for each student who carries out weekly tutorials with students.
 - A dedicated Safeguarding and Wellbeing Mentor based in the HUB.
 - Student Safety Officers to support learners feel safe in and around college.
 - A free counselling provision with a drop-in service.
 - A Social Prescriber
 - A dedicated Learning Support Team.
 - Dedicated 'base rooms' that can be used as safe spaces.
 - Mental Health First Aiders across the college.
 - Social spaces and enrichment activities for students.

- College drop-in services such as Anxiety, Wellbeing, Grief, Trauma, Depression, sexual health, Drugs and Alcohol service and victim Support.

8. OUT OF HOURS CONCERNS

- 8.1. If staff have concerns about a student outside normal college hours; they must contact a DSL/DDSL promptly and log the concern on ProMonitor.
- 8.2. For serious concerns (e.g. threat to life), staff should urgently call either a DSL/DDSL or their line manager, who will ensure the DSL is informed via the safeguarding email or by phone.
- 8.3. Social services/EHASH across local authorities have direct contact numbers for DSLs for out-of-hours or holiday contact.
- 8.4. Staff are not expected to respond to emails or calls outside working hours. Those with work mobiles should only answer calls during standard college/school hours and term time.

9.SAFER RECRUITMENT and STAFF ALLEGATION MANAGEMENT

9.1. 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 2025). Full guidance on safer recruitment can be found in the Safer Recruitment Policy 2025 - 28 [NetConsent \(Policy Documents\)](#)

9.2. 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.
- Be informed that online searches may be carried out.

9.3. **Staff Allegation Management** procedures and guidance can be found in the Staff Disciplinary Policy [Staff Disciplinary Policy 2023-2026.pdf](#)

10. STAFF TRAINING

- 10.1. The Principal, Governors and all staff working with young people and vulnerable adults will receive Safeguarding and Child Protection 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 two years. In addition, staff will receive regular updates on emerging safeguarding themes including local and national issues.
- 10.2. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify students at risk of being drawn into terrorism and to challenge extremist ideas.

- 10.3. All new members of staff will undergo an induction that includes Safeguarding and Child Protection training and familiarisation with the college's Safeguarding and Child Protection Policy and procedure.
- 10.4. 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.
- 10.5. Managers will receive training on safer recruitment practices every 3 years.

11. ONLINE and E-SAFETY

- 11.1. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. We take a whole college approach to ensuring we protect and educate students and staff in their use of technology and have in place established mechanisms to identify, intervene in, and escalate any concerns where appropriate. To address this, our college aims to:
 - Have robust processes and policies in place to ensure the online safety of students, staff, volunteers and governors.
 - Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology. This now also extends to recognising misinformation, disinformation, conspiracy theories and AI.
 - Updated guidance makes it clear that all staff receive training on the expectations, applicable roles and responsibilities in relation to the filtering and monitoring of online information.
 - The designated safeguarding lead should take lead responsibility for understanding the filtering and monitoring systems and processes in place. However, each school will have a designated Governor and member of SLT that maintain oversight of this.
 - Within this policy you will find information on appropriate filtering and monitoring on college devices and networks.
 - The guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c). [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#)
- 11.2. The 4 key categories of risk. Our approach to online safety is based on addressing the following categories of risk:
 - **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
 - **Contact** – being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.
- (Anti-phishing reporting should also be made to (<https://apwg.org/>)).

11.3. To meet our aims and address the risks above we will:

Educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

11.4. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year. Staff are also alerted to the additional mitigations that may need to be in place for children with greater vulnerabilities and ensure that they are also effectively safeguarded.

11.5. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, in line with the Guidance for Safe Working Practice, for example that:

Staff will not take pictures or recordings of students on their personal phones or cameras, nor should they use their own devices to contact students.

11.6. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

11.7. With the emergence of AI, school will refer to DfE guidance on how to use generative artificial intelligence safely, this also explains how filtering and monitoring requirements apply to the use of generative AI in education. [Generative AI: product safety expectations - GOV.UK](#)

11.8. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

11.9. **Filtering and monitoring** part of our online safety process the college has appropriate filtering and monitoring systems in place. Staff need to know and understand the provision in place and how to escalate any concerns effectively.

The DSL has **lead responsibility** for safeguarding and child protection including online safety and understanding the filtering and monitoring systems in place and works closely with the Head of IT

The college reviews annually the filtering and monitoring process
The college blocks harmful contact and has appropriate monitoring strategies in place

The college meets the Department for Education's filtering and monitoring standards.

- 11.10.** This section summarises our approach to online safety and mobile phone use. For comprehensive details about our college's policy on online safety please refer to Full guidance on online safety procedures can be found in [IT Remote Support and Monitoring Policy 2024-2025](#)

12. RECORD KEEPING, CONFIDENTIALITY AND SHARING INFORMATION

- 12.1. 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.
- 12.2. 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 2018 and the UK 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.
- 12.3. 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 SWMs and DDSLs will be responsible for adding safeguarding concerns and monitoring actions and interventions. The DDSLs 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.
- 12.4. Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act and UK 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.
- 12.5. The **Data Protection Act and UK 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.

13. COMPLAINTS PROCEDURE

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 Compliments and Complaint Procedure.

MONITORING AND EVALUATION

The DSL will ensure that safeguarding reports and records are maintained securely and confidentially that the College Senior Leadership 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

Attendance Policy 2025/26
Retention Policy 2025/26
Progression policy 2025/26
Positive Behaviour Support Policy 2025/26
Fit to Study policy 2025/27
Inclusion Policy
Looked After Child and Care Leavers Policy
Professional Guidelines
Staff disciplinary policy 2025 - 2028
Safer Recruitment Policy
EDI Policy
Bullying and Harassment Policy

DOCUMENT REVIEW INFORMATION

Policy Date: 1st September 2025
Policy Author: Tracey Marrow
Date of SLT Sign Off: September 2025
Equality Impact Assessment Completed? Yes
Equality Impact Assessment Date:
Next Policy Review Date: 1st September 2026 or as new relevant guidance is issued, whichever is earlier.
Version Control: Version 4

APPENDIX 1: SPECIFIC SAFEGUARDING ISSUES

This annex outlines key safeguarding concerns and statutory responsibilities for all staff at Hopwood Hall College. It is grounded in the latest guidance from Keeping Children Safe in Education (2025), Working Together to Safeguard Children (2023), and local safeguarding procedures via Rochdale Borough Safeguarding Children Partnership.

1. Children missing from education

A child who is absent from or goes missing from education, particularly repeatedly or for prolonged periods, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM, HBAV or forced marriage.

There are many circumstances where a child may become absent / missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent or go missing from education, particularly on repeat occasions or for prolonged periods, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM, HBAV and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

2. Child-on-Child Abuse

Child -on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school, both face-to-face and online, and can occur simultaneously between the two.

Our college has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

Forms of abuse include:

- Bullying (including cyber, prejudice-based, discriminatory)
- Abuse in intimate relationships
- Physical violence (e.g. hitting, biting, threats online)
- Sexual violence such as rape and sexual assault also includes threats or encouraging sexual violence.
- Sexual harassment, including sexual comments, jokes and online sexual harassment

- Coercion into sexual activity, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves, or to engage in sexual activity with a third party.
- Sharing of nudes/semi-nudes
- Upskirting
- Initiation/hazing rituals
- Online abuse – where children abuse their peers online, this can take the form of, abusive, harassing, and misogynistic/misandrist messages

Staff must act on any concern and report immediately to the DSL or DDSL.

3. Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- 5 Having an older boyfriend or girlfriend
- 6 Suffering from sexually transmitted infections or becoming pregnant

Staff must report suspicions to the DSL, who will refer to Children's Social Care and consult the Complex Safeguarding Team.

4. Child Criminal Exploitation (CCE)

CCE is a form of abuse where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity (e.g. county lines, theft, drug movement). Victims may appear complicit but are being exploited through violence or threat of violence. 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. Those at risk of CCE may be at higher risk of sexual exploitation.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Children involved in criminal exploitation should be treated as victims, even though it may seem they may commit crimes themselves. Girls can also be the victims of CCE too though they may present differently to boys who are being exploited.

Indicators include:

- Unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Emotional changes
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly absent/missing from education
- Not taking part/engaging in education

If a member of staff suspects CCE they will refer to DSL/DDSL and they DSL will refer to and seek multi-agency advice including police and Complex Safeguarding Team

6. Domestic Abuse

In line with the Domestic Abuse Act 2021, children who live in household where there is domestic abuse and/or violence that occurs between family members are themselves identified as being victims, due to the serious, long-lasting emotional and psychological impact this can have. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can be coercive and controlling behaviours. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background.

Older children may also experience domestic abuse and/or violence in their own personal relationships. This can include sexual harassment. The Domestic Abuse Act covers all children over the age of 16.

Living with domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Within Rochdale, our Police force uses **Operation Encompass**. This means that if police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This enables the DSL to consider any support that may be required according to the child's needs and to update school safeguarding records. The DSL may wish to contact the Operation Encompass helpline (telephone number 0204 523 9990) to seek advice about what support may be useful for the child and/or speak to their Early Help Locality Team, or check the local authority domestic abuse webpage for up to date information about local support service; [Getting help for domestic violence and abuse | Rochdale Borough Council](#)

The DSL will provide support according to the child's needs and update records about their circumstances.

Further guidance can be found here; [Rochdale Safeguarding Partnership - Domestic Abuse](#) there are links to the toolkit for schools within these resources and staff may utilise these with children who are victims of Domestic Abuse in their family and close relationships.

7. So-called 'honour-based' abuse and violence (including FGM and Forced marriage)

So-called 'honour-based' abuse (HBAV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBAV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBAV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 6.5 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

A student confiding in a professional that FGM has taken place

A mother/family member disclosing that FGM has been carried out

A family/student already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive. School should always seek advice from EHASH if they are concerned.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the student about the concerns in a secure and private place

Follow local safeguarding procedures and contact EHASH

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk

Refer the student to support services and provision as appropriate

8. Serious Youth Violence:

Violence involving young people where they can be the victim, the perpetrator, or both. Indicators which may signal a young person is at risk from, or involved with, serious violent crime may include:

- Increased absence from college
- Change in friendship or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (could indicate involvement with criminal networks/county lines and be at risk of criminal exploitation)

Risk factors which increase likelihood of involvement in serious youth violence are:

- Being male
- Having been frequently absent, suspended or excluded from school and college
- Having experienced Adverse Childhood Experiences (ACE's)/Trauma
- Having been involved in offending, such as theft or robbery

Young people may carry weapons, including knives, either because they have been manipulated or forced to do so, or because they feel it will help them to protect themselves.

If it is suspected that student is carrying a knife or weapon, the DSL must be informed.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they must report this to the DSL or DDSL.

12. 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.

If a member of staff suspects CCE they must report to the DSL/DDSL. The DSL/DDSL will seek advice from the multi-agency Complex Safeguarding Team.

13. Homelessness Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

14. 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.

15. Cybercrime. Cybercrime is criminal activity committed using computers and/or the internet. Cyber-dependent 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. Students with skills and interests in computers and technology may inadvertently stray into cyber-dependent crime. Further advice can be found at National Cyber Centre – NCSC.GOV.UK

16. Preventing radicalisation:

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

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

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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. The local authority Equality and Community Cohesion Officer, Muhammad Abdulaleem can assist schools in providing appropriate training.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate - Prevent Radicalisation & Extremism](#) and [NSPCC](#) say that signs that a student is being radicalised can include:

- 7 Refusal to engage with, or becoming abusive to, peers who are different from themselves
- 8 Becoming susceptible to conspiracy theories and feelings of persecution
- 9 Changes in friendship groups and appearance
- 10 Rejecting activities, they used to enjoy
- 11 Converting to a new religion
- 12 Isolating themselves from family and friends
- 13 Talking as if from a scripted speech
- 14 An unwillingness or inability to discuss their views
- 15 A sudden disrespectful attitude towards others
- 16 Increased levels of anger
- 17 Increased secretiveness, especially around internet use
- 18 Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- 19 Accessing extremist material online, including on Facebook or Twitter
- 20 Possessing extremist literature
- 21 Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried, irrespective of the age of the child involved.

17. 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”.

18. 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

19. Private Fostering A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. The legislation governing private fostering is the ‘Children (Private Arrangements for Fostering) Regulations 2005’.

More frequently, young people are in private foster care for the following reasons:

- Children from other countries sent to live in the UK with extended family
- Host families for language schools
- Parental ill health
- Where parents have moved away, but the child stays behind, including where families may have had unsuccessful applications to remain in the UK following Brexit.
- Teenagers estranged from their families
- Children brought from outside of UK with a view to adoption
- Trafficked children

Current arrangements for the regulation of private fostering originate from concern following the death of Victoria Climbié in 2000. Victoria was privately fostered by her great aunt. Following this, the Children (Private Arrangement for Fostering) Regulations 2005 set out the duties of local authorities in their arrangements for private fostering, and national minimum standards for local authorities were published in 2005.

Given the 'hidden' nature of much private fostering, local authorities have a duty to raise awareness of the need to notify the local Children's Services department and schools have a vital role within this, as the people who see children and families on a day to day basis.

Further information is available at: [Private fostering information from Childrens Act](#)

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being privately fostered, they will report this to the DSL, who will seek advice from the EHASH.

20. Sharing of nudes and semi-nudes ('sexting'): If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately.

Staff must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it. If staff have already viewed the imagery by accident, they must report this to the DSL.
- Delete the imagery or ask the student to delete it
- Ask the students (s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- Staff should explain that they need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting: Following a report of an incident, the DDSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or Local Authority Children's Social care/EHASH
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)
- or make a referral to the weekly HSB triage.

- 21. Trafficking:** the recruitment, transportation, transfer, harboring 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.
- 22. 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
- 23. 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 consider 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. Local Authority 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 CHILDREN POTENTIALLY 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.

1. **Children with a social worker:** 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).
2. **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.
3. **Children with special educational needs, disabilities or health issues:** We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are

statistically more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students

The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges

4. **Looked-after and previously looked-after children and care leavers.**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and consults with social care and the Rochdale virtual school head, Kirstie Rathbone on 01706 925126 in respect of safeguarding concerns for these children
- We have appointed a Designated person for Looked After and care experienced students who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#) and our [Looked After Children and Care Leavers Policy](#)

As part of their role, the Designated Person will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to, with empathy and in line with trauma-informed approaches
- Work with the virtual school heads, to promote the educational achievement of looked-after and previously looked-after children, including discussing how Post 16 Pupil Premium Plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to, with empathy and trauma-informed approaches

- Work closely with Curriculum Managers to ensure that the Looked After Policy is effective and implemented and in the best interest of the care experienced students ensuring they can fulfil their potential and achieve successfully.

APPENDIX 3 – SAFEGUARDING RESPONSE TO CHILDREN MISSING FROM EDUCATION

1. Being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. The college's response to persistent absence and students missing education supports the identification of such issues when the problems emerge.

Securing good attendance is everyone's responsibility, the college has an Attendance Policy which has clear roles and responsibilities for all staff. It makes clear that all staff have a part to play and effective practice for identification of absences and for improvement of attendance there must be a concerted effort across all teaching and support staff.

For children under the care of, or known to the Local Authority Children's Social Care, these students need additional support as the barriers they face are often complex. These students are the responsibility of the Safeguarding and Wellbeing Team who will work closely with agencies and services in a multi-agency approach. The student will have a named staff member, either a Deputy Designated Safeguarding Lead (DDSL) or a Safeguarding Wellbeing Mentor (SWM) who is responsible for monitoring and actioning any absences with the student, parent/carers and relevant agencies.

2. **Transition period.** Children and young people are especially vulnerable during the transition period from school into college and throughout the long summer break, many miss the safety net of schools, teachers and those who have been supporting them. Financial pressures impact families and increase the vulnerability to children being criminally and sexually exploited over this period. To ensure that all students who have enrolled and do not attend during the first weeks of Term One the DDSL's will manage the process of identifying students who are not attending college by a range of methods:

- Registers and absence reports.
- Identifying those missing from classes by classroom visits.

For those missing SWM's will contact students and parent to ascertain the young person's whereabouts or new destination. Should any safeguarding concerns be identified at this point they will be supported by DDSL's.

Where contact cannot be made a home visit will be carried out.

3. Students withdrawn from college

Parent/Guardian/carers will be informed of the withdrawal for all 16-18-year-old students and a confirmation email will be sent.

Local Authority careers service (Positive Steps) will receive a weekly withdrawal/NEET report.

4. Children already known to Local Authority children's social care (CSC)

For those children already known to local authority children's social care (CSC) and have a social worker (such as a child in need or who has a child protection plan or who is a looked after child) including those who have had CSC involvement in the past 3 years being absent from education may increase the known safeguarding risks within the family or the community. These students are supported by the Safeguarding and Wellbeing Team.

Students will have a Deputy Designated Safeguarding Lead or a Safeguarding Wellbeing Mentor who is responsible for them throughout their time at college. They will monitor their attendance and confirm any absences with the appropriate services and parent/carers within 24 hours.

If contact cannot be made a home visit will be carried out within 48 hours of first notice.

If their college place is no longer viable then the DDSL/SWM will contact all relevant services including social worker. They will make the referral to local authority careers services e.g. Positive Steps, Career Connect.

5. Governance

Governors have a responsibility to ensure that the College has appropriate safeguarding arrangements in place to respond to children who are absent from education. DSL will report on this termly.

APPENDIX 6 - DEFINITIONS of Abuse, Neglect and Exploitation

Abuse: including neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- 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

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
- 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.

[Signs and indicators of child sexual abuse | CSA Centre](#)
[Communicating with children | CSA Centre](#)

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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.

All staff should be aware that **child sexual** and **child criminal exploitation** are forms of child abuse

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.

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.

APPENDIX 4: RESPONDING TO ALLEGATIONS OF SEXUAL ABUSE AND SEXUAL VIOLENCE

1. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. Sexual abuse can happen anywhere, and all staff working with students are advised to maintain an attitude of ‘it could happen here’. Staff should be aware of, and respond appropriately to, all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The DSL/DDSL are likely to have a complete safeguarding picture and be the most appropriate person to advise on the school’s or college’s initial response.
2. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
3. Important considerations will include:
 - 3.1. The wishes of the victims in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be carried out and any support that they will be offered. This will however need to be balanced with the school’s or college’s duty and responsibilities to protect other students.
 - 3.2. As always when concerned about the welfare of a student, all staff should act in the best interests of the student. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other students involved/impacted)
4. The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated.
5. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

6. Most cases of students hurting others will be dealt with under our Positive Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, Upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

7. If a learner makes an allegation of abuse against another learner:

- 7.1. It is important to note that students may not find it easy to tell staff about their abuse verbally. Students can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a student has been harmed or a student's own behaviour might indicate that something is wrong., if staff have any concerns about a student's welfare, they should act on them immediately rather than wait to be told.
- 7.2. When dealing with cases of sexual harassment it is important that two staff members deal with the case one of them being the DSL or DDSL. A key consideration is for staff not to view or forward illegal images of a child. It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- 7.3. Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or Local Authority Children's Social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed on to.
- 7.4. Recognising that a student is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the student discloses recognises that the student has placed them in a position of trust. They should be supportive and respectful of the students.
- 7.5. Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so students may not be able to recall all details or timeline of abuse.
- 7.6. Keeping in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- 7.7. Listening carefully to the young person, reflecting, using the student's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the young person where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask students if they have been harmed and what the nature of that harm was.
- 7.8. Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff

members to devote their full attention to the students and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the student and not appear distracted by the note taking. Either way, it is essential a written record is made.

- 7.9. Only recording the facts as the student presents them. The notes should not reflect the opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by Local Authority Children's Social care and/or part of a criminal investigation.
- 7.10. Inform the DSL/DDSL, as soon as practically possible if they are not involved in the initial report. Staff must not investigate it.
- 7.11. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. The below offers guidance around dealing with and responding to reports of sexual violence and harassment:

8. The DSL/DDSL will:

- 8.1. The DSL/DDSL will discuss the incident with relevant staff within college to gain a picture of what happened using the relevant guidance and tools, (e.g. NSCPCC Hackett continuum [Understanding sexualised behaviour in children | NSPCC Learning](#)) to assess the level of severity in the behaviour and must record their decision and rationale for any outcome.
- 8.2. Whilst the DSL/DDSL establishes the facts of the case and starts the process of liaising with Local Authority Children's Social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The college will carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on college premises and on transport to and from the school or college, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt or innocence of the alleged perpetrator(s).
- 8.3. College will avoid any action that would have the effect of isolating the victim, in particular from peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victims want to not because it makes it easier to manage the situation. Due regard will be given to the above whilst ensuring this does not have detrimental impact on the students learning.
- 8.4. The DSL/DDSL may consult with Youth Justice Team and partner agencies about any concerns related to developmentally inappropriate sexual behaviour at weekly virtual triage meetings.
- 8.5. The DSL will contact relevant support services, e.g. children and adolescent mental health services (CAMHS), HCRG Care (previously Virgin care) as appropriate. School may seek advice from the Early Help Locality Team about which services may be relevant to support the needs of the children impacted.
- 8.6. The DSL/DDSL will engage with Local Authority Children's Social care and specialist services as required. Where there has been a report of sexual violence, it is likely that

professional risk assessments by social workers and or sexual violence specialists will be required.

9. Risk Assessment

9.1. The need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment will be considered:

- The victim, especially their protection and support.
- Whether there may have been other victims.
- The alleged perpetrator(s).
- All the other students, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

9.2. The risk assessment should be recorded using ProMonitor/CPOMS.

9.3. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their students and students and updating their own risk assessments.

10. Options to Manage the Report

10.1. It is important that schools and colleges consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to Local Authority Children's Social Care and/or the police, then, as a rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college from taking immediate action to safeguard their children, where required.

10.2. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learned. It is particularly important to look out for potential patterns of concern, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

Manage Internally

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Early Help

In line with 1 above, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support. Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).

Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Referral to Local Authority Children's Social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to Local Authority Children's Social Care.
- At the point of referral to Local Authority Children's Social Care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of Local Authority Children's Social Care.
- If a referral is made, Local Authority Children's Social Care will then make enquiries to determine whether any of the children involved need protection or other services.
- Where statutory assessments are appropriate, the school or college (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social workers. Collaborative work will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- Schools and colleges should not wait for the outcome (or even the start) of a Local Authority Children's Social Care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with Local Authority Children's Social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college should be immediate.
- In some cases, Local Authority Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. The school or college (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded on Cedar/CPOMS.

Reporting to the Police

Any report to the police will generally be in parallel with a referral to Local Authority Children's Social Care (as above). It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

When to call the police.

- Where a report has been made to the police, the school or college should consult the police and agree to what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
 - At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a young person at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college supports the child in any decision they take. This should be with the support of Local Authority Children's Social care and any appropriate specialist agencies.
 - All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
 - In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
 - Whilst protecting young people and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.
 - If schools or colleges have questions about the investigation, they should ask the police. The police will help and support the school or college as much as they can (within the constraints of any legal restrictions).
 - Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
 - All concerns, discussions, decisions and reasons for decisions should be recorded on Cedar/CPOMS
- 10.3. Considering Bail Conditions: The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- 10.4. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.
- 10.5. Whatever arrangements are in place, the school or college will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

- 10.6. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc.).
- 10.7. Careful liaison with the police investigators should help to develop a balanced set of arrangements.
- 10.8. **Managing Any Delays Within the Criminal Process:** There may be delays in any case that is being progressed through the criminal justice system. Schools and colleges should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school or college.
- 10.9. **The End of the Criminal Process:** If a student is convicted or receives a caution for a sexual offence, the school or college should update its risk assessment, ensure relevant protections are in place for all the children at the school or college and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school or college as the victim, the school or college should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate regarding the perpetrator(s)' timetable.
- 10.10. Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the school or college. It will be important that the school or college ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- 10.11. Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.
- 10.12. Unsubstantiated, unfounded, false or malicious reports: All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concern, problematic or inappropriate behaviour can be identified, and addressed. All information should be recorded on Cedar/CPOMs
- 10.13. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the student and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Local Authority Children's Social Care may be appropriate.

11. Ongoing response – Safeguarding and Supporting the Victim

- 11.1. The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgmental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

11.2. Support can include:

- Early help and Local Authority Children's Social care
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. Agencies can signpost to ChISVA services or referrals can be made directly by the young person or school or college.
- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

11.3. Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, schools and colleges should ask the victim if they would find it helpful to have a designated trusted adult (for example, their

progress tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). Schools and colleges should respect and support this choice.

- 11.4. A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools and colleges should avoid any action that would have the effect of isolating the victim, from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw.
- 11.5. It may be necessary for schools and colleges to maintain arrangements to protect and support the victims for a long time. Schools and colleges should be prepared for this and should work with Local Authority Children's Social care and other agencies as required.
- 11.6. It is important that the school or college do everything they can to protect the victim from bullying and harassment as a result of any report they have made.
- 11.7. Whilst they should be given all the necessary support to remain in their school or college, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
- 11.8. It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.
12. Advice about safeguarding and supporting the alleged perpetrators is set out in departmental advice found here: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

