SAFEGUARDING AND CHILD PROTECTION POLICY

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Contents

Vision 6

Introduction 6

Preamble 6

PART 1 7

Statutory Framework 7

1.1 Information Sharing 7

1.2 Key Statutory and Non-Statutory Guidance 8

2. Roles and Responsibilities 8

Whole college approach to safeguarding 8

2.1 The Principal 9

2.2 The Designated Safeguarding Lead 9

2.3 All Staff 12

2.4 The Governing Body 14

2.5 Students 16

2.6 Parents 17

2.7 Visitors 17

2.8 Key Contacts 17

2.9 Work Placements 18

3. Dealing with Disclosures of Abuse and Procedure for Reporting and Responding to Concerns 18

3.1 Disclosures of Abuse and Procedure for Reporting and Responding to Concerns about Students 18

Escalation Procedures 20

Manchester Safeguarding Partnership Levels of Need Framework and Early Help 20

Safeguarding Adults at Risk 21

18+ year olds 21

Dealing with safeguarding allegations about another student 21

Minimising the risk of safeguarding concerns towards students from other students 22

The necessity for student absence from college in order to safeguard an individual(s) 22

Responding to safeguarding concerns a student presents to themselves 23

Responding to safeguarding concerns relating to students who are missing or absent from college 23

Confidentiality 23

Record-Keeping 24

Written Records 24

3.2 Safeguarding concerns and allegations made about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors 25

3.2.1 Allegations that may meet the harms threshold 26
Procedure for dealing with allegations about supply teachers. 28
Procedure for dealing with complaints and allegations about the Principal. 28
Procedure for dealing with complaints and allegations about Governors. 28
Suspension 29
Parents or carers of the student involved will be: 30
Confidentiality and Information sharing 30
Allegation outcomes 31
Following a criminal investigation or a prosecution 32
Unsubstantiated, unfounded, false or malicious allegations 32
Returning to work 32
Managing the situation and exit arrangements 32
Resignations and 'settlement agreements' 32
Record Keeping 33
References 34
Learning Lessons 34
Non recent allegations 34

3.2.2 Allegations/concerns that do not meet the threshold (low level concerns). 34
Low level concerns 34
What is a low level concern? 35
Sharing low-level concerns 35
Recording low-level concerns 35
References 36
Responding to low-level concerns 36
Timescales 36
Oversight and monitoring 37

Whistle-blowing 37

4. Safer Recruitment Procedures 38

PART 2 39

Safeguarding Practice Guidance 39

Appendix A 39
A.1 Definitions of abuse 39
Transitional Safeguarding: 39
There are four key categories of abuse: 40
Signs and symptoms 41
Contextual Safeguarding and extra-familial harm 41
Specific Safeguarding Issues 41
A.2 Further information on so called 'honour based' abuse 42
A.2.1 Female Genital Mutilation 42
A.2.2 Forced Marriage 43
A.3 Further information on Preventing Radicalisation 44
A.3.1 Incel 45
A.4 Further information on Children Missing 45
A.4.1 Child Missing or Absent from Education 45

A.4.2 Children Missing from Home or care 46
A.5 Further information on Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) 47
Facts and myth busters about child criminal exploitation: 48
A.5.1 Further information on County Lines 49
A.6 Modern Slavery and the National Referral Mechanism 50
Child Trafficking 50
Forced Labour/Debt Bondage 51
Forced Labour 51
Sexual Exploitation 51
Criminal Exploitation 51
Domestic Servitude 52
A.7 Cybercrime 52
A.8 Further information on Fabricated or induced illness 53
A.9 Further information on Domestic Abuse 53
A.9.1 Operation Encompass 55
A.10 Further information on Peer on Peer Abuse 55
A.10.1 Sexual Violence and sexual harassment 57
What is Sexual violence and sexual harassment? 57
What is consent? 58
Reporting 59
The response to a report of sexual violence or sexual harassment 59
Manage internally 60
Early Help 60
Referrals to children's social care 61
Reporting to the police 61
Considering bail conditions 62
Managing any delays in the criminal process 62
The end of the criminal process 62
Unsubstantiated, unfounded, false or malicious reports 63
Ongoing Response 63
A.10.2 Sharing of nudes and semi-nudes images and/or videos 63
Defining the incident 65
Responding to incidents and safeguarding young people 66
Assessing 67
A.10.3 Upskirting 67
A.10.4 Bullying 68
A.10.5 Cyber-bullying 68
A.10.6 Serious Violence and Gangs 68
A.11 Further information on Mental Health 70
A.12 Further information on Children and the court system 71
A.13 Further information on Children with family members in prison 71
A14. Homeless 16- and 17-year-olds 71
Out of hours/emergency referrals 72
A.15 Substance misuse 72
A.16 Hate Incidents 72
A.17 Further information on Online Safety 73
Communication with parents 75
Harmful online challenges and hoaxes 75

Appendix B 76

Students in particular circumstances 76
B. 1 Early Help 76
B.2 Children who need a social worker 76
B.3 Pathways and Disabled students 77
B.4 Looked after and previously looked after children 78
Care leavers 78

B.5 Children who are lesbian, gay, bi or trans (LGBT) 79
B.6 Private Fostering 79

Appendix C 80

Safeguarding Adults 80
Safeguarding Adults at Risk of Harm 80
Adults with disabilities 80
Definition of adult at risk 80
Definitions of abuse – adults at risk 81
Signs of possible abuse in adults at risk 82
Other indications that abuse may be occurring: 83
What to do if you suspect mistreatment of an adult at risk or they disclose that they have been abused/referral procedure 83
Considerations for information sharing: 84
Further information on Mental Capacity 85

Appendix D.1: Safeguarding Guidance Poster 86

Appendix D.2 : Recording Disclosures 87

Appendix E: College Safeguarding Referral Structures 88

Appendix F: Levels of Need 91

Appendix G: Use of Reasonable Force 92

Appendix H: Risk and Needs Assessment: Sexual Violence/Harassment 93

Appendix I: Transfer and receipt of Safeguarding Files 106

Appendix J: Escalation Process 108

Appendix K: Loreto Mental Health Framework 109

Appendix L: Further information for Governors 119

SAFEGUARDING AND CHILD PROTECTION POLICY AND SAFEGUARDING PRACTICE GUIDANCE

Vision

Loreto College is centred in God, rooted in Christ and animated by the spirit of Mary Ward, the founder of the Institute of the Blessed Virgin Mary. Our vision is that it will be an educational community where each person has the experience of being loved and valued as a sacred individual created by a loving God; a community where students enjoy an enriching and liberating education that helps them grow into the fullness of life and empowers them to be men and women of courage who are alive to the needs of humanity and committed to making a better world.

Introduction

The College aims to be an educational community which gives expression to the core values of Mary Ward - freedom, justice, sincerity, truth, joy, excellence and internationality.

Loreto College has the highest expectations of personal, academic and professional excellence. This document sets out the College's Safeguarding and Child Protection Policy and guidance on the procedures it will follow relating to safeguarding of children and vulnerable adults. The college will endeavour to act at all times with justice, compassion and respect for the dignity and worth of all members of the college community but in doing so it will act in accordance with its legal responsibilities and its primary duty of care to children and vulnerable adults for whom it is responsible.

Preamble

Loreto College's statement of safeguarding policy aims to:

- incorporate the statutory requirements placed on the College;
- to ensure the safety and welfare of our students;
- to promote the training and development of staff within the workplace and learning environment
- to understand that safeguarding is everyone's responsibility
  to embed a positive safeguarding culture which allows learning to proceed in such a way to ensure the safety of all– no single professional can have a full picture of a child's needs and circumstances.
- link into other relevant college policies

The policy is reviewed annually and is available on the college website.

PART 1 – SAFEGUARDING AND CHILD PROTECTION POLICY

Statutory Framework

Loreto College recognises that all members of staff and students have an important role to play in safeguarding the welfare of children and adults and preventing their abuse. 'Safeguarding and promoting the welfare of children is **everyone's** responsibility.' (Keeping Children Safe in Education, September 2025)

1.1 Information Sharing

The duty to share information arises from:

- Children Act 1989
- Children Act 2004 Section 11
- Duty to make arrangements to ensure their functions are discharged with regard to the need to safeguard and promote the welfare of children.
- General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- 'Safeguarding of children and individuals at risk' allows practitioners to share information without consent.

When children are suffering or may be a risk of suffering significant harm, concerns must always be shared with children's social care or the police.

Schools and colleges have a general duty to share, hold and use information with other agencies where they have safeguarding concerns. However, consent must be sought directly from parents on a case-by-case basis. It is good practice that schools and colleges should work in partnership with parents and carers. This means that in general schools and colleges should share information with other agencies with the parents knowledge and consent.

If parents do not consent, the duty to refer overrides this, as the safety of the child is paramount.

Seeking consent is not required, if to do so would:

- Place a person at increased risk of harm (usually the child, but also a family member or another person).
- Prejudice the prevention, detection or prosecution of a serious crime or
- Lead to an unjustifiable delay in making enquiries.

Student consent/concerns about information sharing is recorded on the College's internal Disclosure Form. Parental consent is recorded via the use of safeguarding documentation specific to each separate Local Safeguarding Partnership. From September 2019 Manchester Local Children's Safeguarding Board has been replaced by the Manchester Safeguarding Partnership who have published Manchester Multi-Agency Safeguarding Arrangements (MMASA) June 2019, implemented in September 2019.

1.2 Key Statutory and Non-Statutory Guidance

This safeguarding and child protection policy applies to all adults connected with the college, including permanent and temporary staff, volunteers and Governors. The policy has been developed in accordance with the principles established by the Children Acts of 1989 and 2004; the Education Act 2002, the Education and training (Welfare of Children) Act 2021 and in line with government publications 'Working Together to Safeguard Children' (2023), the revised safeguarding statutory guidance 'Framework for the Assessment of Children in Need, and their Families' (2000), 'Information sharing advice for safeguarding practitioners' (2018) and 'What to do if you are worried a child is being abused' (2015). The guidance reflects, 'Keeping Children Safe in Education (September 2025).

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our students and staff. It identifies actions that should be taken to redress any concerns about student safety and welfare including protecting students and staff from extremist views, vocal or active, which are opposed to fundamental British Values. All opinions or behaviours which are contrary to these fundamental values and the ethos of the college will be vigorously challenged.

This policy should be read in conjunction with the policies and procedures for

Linked Policies/Procedures:

Anti-Bullying Policy
Attendance Procedures
Code of Respect
Student Behaviour Policy
Single Equality Scheme
Disciplinary Procedure – Misconduct
Policy of Race Equality
Recruitment and Selection Policy
Equal Opportunity Policy
Safeguarding Referral Structures ALS & Pathways
Safeguarding Referral Structures FAR
Safeguarding referral structures college wide
Absconding and Going Missing Procedure – Pathways
Safer Recruitment (Recruitment, Selection and Disclosure policy)
Guidance for Safer Working Practice
Online Safety Policy
DBS Policy
Prevent Policy
Anti Drugs Policy
Computer Code of Conduct
Student Charter
Whistleblowing Policy
Code of Conduct Staff
Leaner Involvement Strategy
Shielding Policy
Harassment Policy

2. Roles and Responsibilities

Whole college approach to safeguarding

The Governing Body will ensure they facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies will operate with the best interests of the student at their heart.

Where there is a safeguarding concern, the Governing Body and college leaders will ensure the student's wishes and feelings are taken into account when determining what action to take and what services and support to provide. Systems will be in place, well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Loreto College fully recognises its obligation to safeguarding and protecting students and is committed to three key elements of safeguarding namely:

1. ***Prevention*:** via a positive college atmosphere, teaching and pastoral support students.
2. ***Protection*:** by adhering to agreed procedures, ensuring staff are training and supported to respond appropriately and sensitively to safeguarding concerns.
3. ***Support*:** for students and staff who may have been abused.

2.1 The Principal

The Principal has the ultimate responsibility for safeguarding and promoting the welfare of students. Loreto College recognises that members of staff and students equally have an important role to play in safeguarding the welfare of children and adults who may be at risk and preventing their abuse.

2.2 The Designated Safeguarding Lead

All matters relating to concerns around Safeguarding Children and Adults who may be at risk must be referred to the Designated Safeguarding Lead, Mrs Andrea Pritchard, Deputy Principal, who can be contacted on 0161 226 5156.

It is the responsibility of the Designated Safeguarding Lead to ensure that this policy is reviewed annually. Other members of staff will be trained as Deputy Designated Safeguarding Leads to ensure that appropriately trained personnel are available in the absence of the Designated Safeguarding Lead. Deputy Designated Safeguarding Leads are trained to the same standard level as the Designated Safeguarding Lead. The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads form the Safeguarding team.

In addition to indicators of abuse and neglect the Designated Safeguarding Lead and Deputies should consider whether children are at risk of abuse or exploitation in situations inside or outside of their families. Extra-familial harm takes a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse) criminal exploitation, serious youth violence, county lines and radicalisation

The Deputy Designated Safeguarding Leads are:

Claire Otto	Jake Harrison
Adam Squires	Helen Gettings
Danny Webb	Tom Harnell
Ian Maddix	Kate Moore
Jonty Leach	Kellie Taylor
Lois Scholes	Aine Lamming
Jack Griffiths	Amna Rehman
Kate Boon	Louise Finnigan
Jake McCullough	Leah Cox
Laura Mullen	Stacey Appleby

To speak with any member of the Safeguarding team please contact the college on 0161 226 5156 ext 8600. Please refer to the 'Where to find your Head of Hall' poster for room numbers of Heads of Halls (DDSLs) or visit Student Services (BG19, next to Ball reception) for support or directions.

The Designated Safeguarding Lead is responsible for:

- Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Overseeing the referral of cases of suspected abuse or allegations to the local authority children's social care as required. Supporting staff who make referrals to local authority children's social care. The same will apply for referrals to adult social care.
- Referring cases to the Channel program where there is a radicalisation concern as required. Supporting staff who make referrals to the Channel program.
- Referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Services as required.
- Liaising with the designated officer at the local authority for child protection concerns in cases which concern a staff member.
- Referring cases where a crime may have been committed to the Police as required.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Ensuring that parents of students within the College are aware of the College's safeguarding policy.
- Liaising with appropriate agencies.
- Acting as a point of contact with the three safeguarding partners.

- Liaising with the principal to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance: PACE Code C 2019
- Liaising with secondary schools which send students to the College to ensure that appropriate arrangements are made for the students.
- Liaise with the mental health lead and student services, where safeguarding concerns are linked to mental health.
- Liaising with employers and training organisations that receive students from the College on placements to ensure that appropriate safeguards are put into place.
- Ensuring that staff receive appropriate training in safeguarding procedures, including online safety and understanding the filtering and monitoring systems and processes, and will have read and understood Part 1 of Keeping Safe in Education (September 2025).
- Reporting annually to the Governing body of the College on how the College has discharged its duties. The Designated Safeguarding Lead is responsible for reporting deficiencies in procedure to the Governing body at the earliest opportunity.
- The Designated Safeguarding Lead will undergo updated child protection training every two years, as a minimum and undertake Prevent awareness training.

Training should provide Designated Safeguarding Leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- ensure each member of staff has access to, and understands, the college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rational for those decisions. This should include instances where referrals were or were not make to another agency such as LA children's social care or the Prevent program etc.. Records should include a clear and comprehensive summary of the concern, details of how the concern was resolved and a note of any action taken, decisions reached and the outcome.

- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are 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 college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role. The Designated Safeguarding Lead will have a good understanding of the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

The Designated Safeguarding Lead should:

- ensure the college's child protection policies are known, understood and used appropriately;
- ensure the college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing body regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children/students, including where families may be facing challenging circumstances.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college leadership staff as appropriate. This includes ensuring that the college, knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory care intervention has ended, there is still a lasting impact on children's /student's educational outcomes.

2.3 All Staff

- Will attend INSET on Safeguarding issues so that they can recognise signs and symptoms of abuse and are made fully aware of the procedures for reporting and

recording it. Safeguarding and Child Protection training includes online safety (filtering and monitoring roles and responsibilities). All Staff will receive a copy of Keeping Children Safe in Education Part 1.

- All staff should be aware of systems in the college which support safeguarding including:
  - The Safeguarding and Child Protection Policy
  - Student Behaviour Policy
  - Staff Behaviour Policy
  - Safeguarding Response to children who are missing or absent from education
  - Role of the Designated Safeguarding Lead and Deputies.
- All staff should be aware of the local early help process and understand their role in it (See Section B.1)
- All staff will be made aware of the process for making referrals to children's social care along with the role that might be expected to play in statutory assessments under the Children Act 1989.
- Are encouraged to be vigilant to recognise signs of abuse, neglect and exploitation (See Appendix A) and should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and can occur between students outside of these environments. Staff should consider whether students are at risk of harm in situations outsides of their families including sexual exploitation, sexual abuse, serious youth violence and county lines/child criminal exploitation.
- Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. In most cases, multiple issue will overlap with one another, therefore staff should always be vigilant and always raise concerns with the DSL (or deputy).
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Students are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Students can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images or 'nudes', especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Staff should have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at the college.
- All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse, see Section A.9). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers and know how to respond to reports.
- Staff members working with students are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the best interests of the student.
- Staff visiting the college or who work at the college on an irregular basis are informed about safeguarding procedures. Visiting speakers are vetted to ensure that talks given to students are not used as a vehicle to communicate extremist views. Visiting speakers are made aware of the college's safeguarding policy and arrangements.
- It is the policy of Loreto College to work with Manchester Safeguarding Partnership including the police and social care while always placing the welfare of the child or adult at risk at the centre of any actions taken.
- Any staff member who has a concern about a student's welfare should follow the referral process (See Section 3 and Appendix D)
- Ian Maddix is the Designated Teacher with responsibility to work with local authorities to promote the educational achievement of f Looked After Children in the College, and promoting the educational achievement of children who have left care through

adoption, special guardianship or child arrangement orders. The Designated Teacher will work with the relevant Virtual School Head as appropriate and assist in the coordination of Looked After and Personal Education Plan reviews.

- Staff have a legal power to use reasonable force to prevent students from hurting themselves or others, from damaging property or from causing disorder. (See Appendix G).
- Amna Rehman is the Designated Teacher with responsibility for Prevent. The Designated Teacher for Prevent will work with staff to support the promotion of Prevent across the College.

2.4 The Governing Body

The Designated Governor for Safeguarding (including Prevent and Online Safety) is Sister Patricia Goodstadt.

Sister Patricia can be contacted via: The Clerk to the Governors, Loreto College, Chichester Road South, Manchester, M15 5PB. Tel: 0161 226 5156.

A formal report will be made to the governors on numbers of interventions and, if appropriate, outcomes of any interventions. The report will be limited in its content to ensure the protection of those involved.

The Governing Body should ensure that:

- It provides a safe environment for its students.
- Where reasonably possible, the college holds more than one emergency contact number for each student. This goes beyond the legal minimum.
- Facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. The college has effective safeguarding and child protection policy and procedures in place that reflect the whole college approach to peer on peer abuse and that are in accordance with government guidance and locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- The Safeguarding and Child Protection Policy is made available on the College website.
- The college has a Code of Conduct for staff.
- The college identifies students who are suffering, or at risk of suffering, harm and takes appropriate action to see that these young people are kept safe. This includes appropriate responses to children who are missing or absent from education.
- The college operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children and adults at risk.
- The college has procedures for dealing with allegations of abuse against staff, visitors and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.
- A member of the college's senior management team is designated to take lead responsibility for safeguarding (The Designated Safeguarding Lead). Staff undertake appropriate safeguarding training, including online safety (filtering and monitoring roles and responsibilities), that safeguarding training for staff, is integrated, aligned and

considered as part of the whole college safeguarding approach and wider staff training and curriculum planning. Whilst considering the above training requirements, the Governing Body will have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all students.

- They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements, working with relevant authorities to find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of children and young people. If required Loreto College will provide an individual management report for a Serious Case Review (SCR) and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.
- A governor is nominated to be responsible for liaising with the Local Authority in the event of allegations of abuse being made against the Principal. This governor will also oversee internal policies relating to safeguarding issues e.g. student absence etc.
- Where services or activities are provided on the college premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the college on these matters where appropriate.
- The Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- The Governors ensure the student's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual student's by ensuring there are systems in place for student's to express their views and give feedback. Systems will be well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Governors ensure child protection files are maintained.
- Governors are provided with updates as to how students are informed to safeguard themselves via the tutorial system, RE, assemblies, cross-college information, arrangements for the summer holidays etc.
- The Governors ensure the college has appropriate I.T. filters and monitoring systems in place and are careful that "over-blocking" does not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding. Governors should regularly review the effectiveness of filters and monitoring systems. Governors should review the filtering and monitoring standards and discuss with IT staff and service providers what needs to be done to support the college in meeting this standard. They should ensure the Senior Leadership Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- The Governing body will appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.
- The governing body are updated on how children are taught about safeguarding and are supported to build resilience with regard to safeguarding issues, including online, through teaching and learning opportunities. The opportunities arise as part of providing a broad and balanced curriculum, General RE, the Tutorial and assembly structure.
- Governing bodies 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.

- Governing bodies should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

    a) Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
    b) Understanding that 'safeguarding of children and individuals at risk' – is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, if to gain consent would place a child at risk.
    c) For schools/colleges, not providing students' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation and the serious harms test is met, they must withhold providing the data in compliance with the schools/colleges obligations under the Data Protection Act 2018 and the. Where in doubt schools/colleges should seek independent legal advice.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

- The Governing body should ensure that all governors and receive appropriate safeguarding and child protection (including online) training at induction. The training is regularly updated.
- The Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. See **Appendix L** for further information.

2.5 Students

The college is committed to ensuring that students are aware of behaviours towards them that are not acceptable and how they can keep themselves safe. All students know that we have a senior member of staff with responsibility for safeguarding and know who this is. We inform students of whom they might talk to, both in and out of college, their right to be listened to and heard and what steps can be taken to protect them from harm. Materials we use to help students know how to keep safe are referred to in Assemblies, Tutorial Handbooks, Distributed Materials and Assembly Notices.

2.6 Parents

The college shares a purpose with parents to keep children safe from harm and to have their welfare promoted.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child or adult who may be at risk.

College will share with parents any concerns we may have about their child and of any referrals to be made to Children's Social Care unless to do so may place a child at risk of harm. In such cases the Designated Safeguarding Lead will seek advice from Children's Social Care. We encourage parents to discuss any concerns they may have with the appropriate Head of Hall. We tell parents in our Prospectus of our commitment to Safeguarding and the Safeguarding Policy can be found on the college website.

Parents are supported in the safeguarding of their child through the information provided on the college website and completion of documentation as relevant e.g. Absence letters/ Holiday letters. The college seeks permission from all students to share safeguarding information with parents, when staff feel it is in the best interests of the student, regardless of the age of the student.

2.7 Visitors

Information is made available to all visitors at the College Reception. This includes a quick reference guide to safety procedures and information on Child Protection and Safeguarding (for Supply Teachers, Invigilators, Student Teachers, Peripatetic Music Teachers and Visitors).
Visitors must refrain from taking any photographs or recordings of any kind without prior permission.

2.8 Key Contacts

- **Designated Safeguarding Lead:** Andrea Pritchard ext. 391 or apritchard@loreto.ac.uk
- **Principal:** Michael Jaffrain
- **Governor for Safeguarding:** Sister Patricia Goodstadt
- **Designated Officer for Manchester (LADO):** qualityassurance@manchester.gov.uk, 0161 234 1214
- **Designated Teacher for LAC:** Ian Maddix ext 3019 or imaddix@loreto.ac.uk

During term time, the designated safeguarding lead and/or a deputy should always be available (during college hours) for college staff, students or external agencies to discuss any safeguarding concerns. (See details for the Safeguarding Team in 2.2)

For trips or activities organised by the college and taking place outside college hours or outside of term time an emergency contact is nominated from the Senior Management Team to provide any required safeguarding support.

In situations where students are attending activities provided by external establishments such establishments should follow their own safeguarding procedures in response to any matters of concern. Loreto staff will not be available to provide a safeguarding or welfare response to students attending such activities outside of office hours or term time.

2.9 Work Placements

Employers and training organisations will be asked to cooperate with the College in putting in place and subscribing to appropriate safeguards.

Staff arranging placements will have had training in child protection.

Vetting and DBS checking any person whose normal duties will include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically designated to have responsibility for such activities.

3. Dealing with Disclosures of Abuse and Procedure for Reporting and Responding to Concerns

3.1 Disclosures of Abuse and Procedure for Reporting and Responding to Concerns about Students

All concerns and disclosures relating to students will be recorded on the myLoreto Safeguarding Log.

See Appendix A for Practice Guidance regarding categories of abuse.

College staff who have regular contact with students are well placed to observe significant changes in behaviour, issues of neglect or outward signs of abuse. Students may choose to share their concerns with staff they feel they can trust and with whom they are comfortable. Staff need to know how to respond sensitively to the concerns and who to approach for advice and guidance. Whilst college staff are not responsible for investigating abuse it is essential that any suspicions of significant harm or allegations of abuse are acted on and treated seriously.

Sometimes a member of staff may have suspicions that a student is being abused, exploited, neglected or is at risk of significant harm. A student may also disclose to a member of staff that he/she is being abused. In these circumstances the procedure outlined below should be followed. If a member of staff has a significant concern about a student and believes they are being abused or at risk of immediate significant harm, then this must be reported to the Designated Safeguarding Lead immediately.

If a member of staff has significant concern about a student, but does not believe that they are being abused or are at risk of immediate significant harm, she/he should:

- Talk to the student about the concern(s). Reassure the student that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
- Speak to the student's Head of Hall who will discuss the issues with the Designated Safeguarding Lead. They may choose to speak directly to the Designated Safeguarding Lead.
- In the absence of the Designated Safeguarding Lead, a Deputy Designated Safeguarding Lead can be contacted.
- All staff can make a referral to Children's Services if appropriate staff are not available. If a member of staff receives a disclosure of abuse from a student, questions to that student must be kept to the absolute minimum necessary to understand what is being alleged. Leading questions must be avoided. Further information on how to contact Children's Services can be found on display in staff rooms

See Appendix D for Safeguarding guidance for staff poster.

A full record of any conversations must be recorded using the electronic ***Record of Disclosure Form (Appendix D)*** immediately after any conversation with the student and must include:

- The name of the student
- The date and time of disclosure
- Location where the abuse took place and date and time
- The name/names of other persons present
- A description of injuries observed
- The nature of the alleged abuse
- The exact words spoken by the student

Promises of confidentiality must not be given but a student should be reassured that we as a college want to help them, and to do so "we need to know".

Some students 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, students may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to any member of the safeguarding team, or the DSL if they have concerns about a child.

Some students with learning difficulties or disabilities may need additional support at any interview. This may take the form of the student's teacher/tutor/head of hall being present at interview to act as a facilitator or in an advocacy role. It should never be assumed that a student with learning difficulties or disabilities is not capable of providing credible evidence.

The Designated Safeguarding Lead or Deputy will decide on a course of action. The Designated Safeguarding Lead or Deputy should refer the matter to the relevant Local Safeguarding Partnership whenever abuse (meeting threshold) has been reported or whenever it is genuinely believed that abuse has taken place. A written record of the date and time of the report should be made and the name and position of the person to whom the report was made. A copy of this must be kept on file.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care and/or the police immediately. Anybody can make a referral. If anyone other than the Designated Safeguarding Lead makes a referral they should inform the Designated Safeguarding Lead as soon as possible. Where a crime has been committed this must be reported to Greater Manchester Police. 'NPCC – When to call the police' (February 2020) provides guidance on when to consider calling the police and what to expect when the police have been contacted.

Escalation Procedures

Loreto safeguarding team work closely with external agencies and practitioners to safeguard students. Constructive challenge among colleagues within agencies and between agencies provides a healthy approach to planning to keep children and adults safe.
Sometimes an issue cannot be resolved and procedures are needed to escalate concerns, while keeping the focus of concern on the adult or the child.

Manchester's Multi-Agency Safeguarding Arrangements (MMASA) provide guidance on what to do if there is concern about a decision or practice in a case. Further information regarding this should be sought from MMASA procedures. The guidance recognises that escalation is more productive when dealt with by peer colleagues.

Where concerns need to be raised with another agency this will be done as soon as possible and discussions will be clearly recorded.

If the safeguarding team are unable to resolve an issue themselves directly with professionals, then guidance will be sought from the Designated Safeguarding lead. Unresolved issues will be addressed by the Designated Safeguarding Lead through the line management of the respective agency incrementally. Clear records will be kept at all stages including written confirmation of an agreed outcome and how any outstanding issues will be pursued. There are specific processes to follow relevant to the stage of dissent (i.e. at referral stage, Child Protection conference etc.).

When Professional differences remain escalation should continue throughout the line management to DCS/Chief Executive of the respective organisations but this should only be in exceptional circumstances and the expectation is that agencies will find a resolution in a timely manner. In the unlikely event that the issue is not resolved by the steps above it should be brought to the attention of the relevant person in the Manchester Safeguarding Partnership or equivalent local safeguarding partnership who will determine the appropriate course of action.

See Appendix J for Escalation Process flowchart.

Manchester Safeguarding Partnership Levels of Need Framework and Early Help

Loreto College have adopted Manchester Safeguarding Partnership Multi- Agency Levels of Need and Response Framework. The framework is used to identify the level of need of a student and most appropriate response. Loreto College endeavor to identify students requiring an enhanced level of support and follow procedures relevant to the local authority in which the student resides. See Appendix F.

If Early Help/referral to specialist services is appropriate the Designated Safeguarding Lead or Deputy will liaise with other appropriate agencies and set up an inter-agency assessment as appropriate. Such cases will be kept under review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

Safeguarding Adults at Risk

Where a student who is not a child under the Act is identified as being at risk the Designated Safeguarding Lead will make a decision on whether there is a need to involve outside agencies such as social care or the Police.

See Appendix C for further information regarding Adults at Risk

Outside agencies should only be involved with the agreement of the alleged victim unless disclosure is necessary in the over-riding public interest (e.g. to protect others from serious harm). In the case of students with learning difficulties, advice will be sought from the appropriate persons/agencies which could include the Head of Pathways to Independence Course, Case Worker or Social Workers.

18+ year olds

The college is aware that students who are categorised as children (under 18) will be working in class alongside students who are categorised as adults in safeguarding terms (students who are 18 and over).

In order to be proportionately responsive to the risk this may present, staff will be vigilant at all times and be mindful that children are working alongside adults.

Dealing with safeguarding allegations about another student

At Loreto we believe that all students have a right to attend college and learn in a safe environment. Children should be free from harm by adults in the college and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the college's *Student Behaviour Policy or Anti-Bullying Policy*.

Any concern or expression of disquiet made by a student will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare. We will make sure that the student or adult who has expressed the concern is listened to carefully and the concern will not be passed off as 'banter' or 'part of growing up'. Staff should always be alert to the possibility of peer-on-peer abuse (See Appendix A10 for further information). Where concern relates to Gangs and Youth Violence, see Appendix A.9.

Minimising the risk of safeguarding concerns towards students from other students

On occasion, some students will present a safeguarding risk to other students. The college should be informed where a young person raises safeguarding concerns, for example they are coming back into college following a period in custody or they have experienced some serious abuse themselves. These students may need an individual risk management plan to ensure that other students are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

Loreto College may request that a student provides evidence of cooperation with statutory or support agencies to satisfy any safeguarding concerns and safety on site before a student is permitted to resume attendance.

What to do

When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the Designated Safeguarding Lead should be informed. A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The Designated Safeguarding Lead may contact social services to discuss the case. It is possible that social services are already aware of the safeguarding concerns around this young person. The Designated Safeguarding Lead will follow though the outcomes of the discussion and make a social services referral where appropriate.

The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome and keep a copy in the safeguarding files of both students.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim). It may be appropriate to suspend the student being complained about for a period of time in accordance with procedures.

Where neither social services nor the police accept the complaint, a thorough college investigation should take place into the matter using the usual disciplinary procedures.

In situations where the college considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. The plan should be monitored and a date set for follow-up evaluation with everyone concerned.

The necessity for student absence from college in order to safeguard an individual(s)

It may be necessary in some instances for a student(s) to have a period of absence from college as a result of safeguarding concerns.

Student(s) may need to be absent dependent upon the risk (internal or external) to the individual as a result of attending college. Loreto would seek to work co-operatively with any external agencies e.g. Children's Services, Police etc. to ensure all measures were taken to safeguard the student. The Designated Safeguarding Lead would seek to balance the needs of the individual(s) with the safeguarding responsibilities for the college population as a whole.

In some cases, it may be necessary for a student(s) to have a period of absence from college if it felt the student(s) poses a safeguarding risk to other college students or staff. In such cases, the Designated Safeguarding Lead would seek to thoroughly investigate any risk, working with appropriate internal staff and external agencies/professionals.

An essential requirement of our safeguarding procedures is the ability to contact parents/carers as necessary and appropriate and for this, we need up-to-date contact details from parents/carers. If requests for such information have been repeatedly requested, but not responded to, it may be necessary to suspend a student until the information is provided.

Parents/ carers would be informed of this action and contact details would again be requested. Once appropriate details had been supplied, the student would then be reinstated.

Responding to safeguarding concerns a student presents to themselves

On occasion where a student has experienced a safeguarding related incident Loreto College, may request the student seek appropriate medical advice and provide evidence that they are well enough to return to College before they are permitted to do so. Medical clearance to return may also be requested after periods of hospitalisation or where concerns regarding a student's safety have escalated.

Responding to safeguarding concerns relating to students who are missing or absent from college

The attendance of students is monitored as described in the Attendance Procedures. Teachers and Tutors report patterns of non-attendance to the Attendance Officer who investigates absence concerns. Consecutive absence generates an automatic alert to the Attendance Officer and Head of Hall. Where concerns indicate any risk of abuse and/or neglect the information is shared with the Head of Hall/Safeguarding Team who will escalate through local procedures where necessary.

Confidentiality

Where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration in information sharing.

Staff will ensure that confidentiality protocols are followed and information is shared appropriately. Staff must understand that they have a professional responsibility to share information with other agencies in order to safeguard children/students. Staff and volunteers must be clear with students that they cannot promise to keep secrets.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children/students safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare and promote the safety of children/students. Further information can be found in Working Together to Safeguard Children, The Information Commissioners Officer (ICO), Data protection, toolkit for schools, Information Sharing: Advice of Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers.

Record-Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Loreto College will keep and maintain up to date information on students including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. Loreto College will endeavour to obtain details of allocated personal advisors for care leavers. The college will record a chronology of other significant events in a student's life. Access to all confidential safeguarding information is on a 'need to know' basis and a log of who has accessed files is kept.

All safeguarding concerns and disclosures are recorded electronically on the encrypted myLoreto Safeguarding Log.

Safeguarding and child protection records must be retained by all educational establishments, unless the records are transferred to a new establishment if the student transfers to a new provision. If a student transfers to a new establishment then all formal records should be transferred as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained (See Appendix I). Loreto College will consider if it would be appropriate to share any information with the new college in advance of a student leaving.

Loreto College will retain all confidential safeguarding and child protection records for 10 years after the student has left the college. At the end of the retention period any confidential paper records will be shredded by Loreto College and then entrusted to a firm specialising in the destruction of confidential material. All electronic safeguarding and child protection files will be purged.

Staff have a responsibility to report any concerns about the welfare and safety of a student and all such concerns must be taken seriously. If a concern arises staff must speak with one of the safeguarding team who will notify Andrea Pritchard, Designated Safeguarding Lead (or the person who acts in their absence). Agree with this person what action should be taken, by whom and when it will be reviewed. Record the concern using the Safeguarding Log disclosure.

Written Records

The Designated Safeguarding Lead or Deputy shall retain a copy of:

- The Disclosure Form.
- Any notes, memoranda or other correspondence dealing with the matter.

Any other relevant materials.

3.2 Safeguarding concerns and allegations made about staff (teachers, other staff and supply teachers), visitors, volunteers and contractors

Concerns and/or allegations against those working in or on behalf of the college in a paid or unpaid capacity will be dealt with in line with the guidance in Part 4 of "Keeping Children Safe in Education – September 2025" and local safeguarding procedures.
Any allegations made against a member of staff and visitors including supply teachers, contractors or security staff working on the site, will be dealt with quickly and fairly and in a way that provides effective protection for the student while at the same time providing support for the person against whom the allegation is made.

Loreto has a duty of care towards its employees and will always seek to provide effective support for anyone facing an allegation and minimise the stress inherent in the allegations process.

All concerns, allegations or suspicions regarding members of staff, visitors, volunteers, or contractors, including supply staff, must be taken seriously and must be reported to the Designated Safeguarding Lead as soon as possible and in any case within 2 hours of the initial concern arising. If the Designated Safeguarding Lead cannot be contacted a member of the Senior Management Team or a Deputy Designated Lead must be contacted. On being notified of any such matter, the Designated Safeguarding Lead shall:

- Take such steps, as she considers necessary to ensure the safety of the student in question and any other person who is considered at risk.
- Immediately notify the Principal or in his absence another Vice/Assistant Principal.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. The Designated Officer (LADO) should be informed of all allegations that come to the attention of the college and appear to meet the criteria so they can consult police and children's social care services as appropriate.

Staff must not investigate these allegations or concerns. All concerns, allegations or suspicions should be reported to Andrea Pritchard (Designated Safeguarding Lead and Deputy Principal). The Principal will also be notified as soon as practicable and in any event within 24 hours of disclosure or suspicion being raised.

There are two levels of allegation/concern:

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'.

3.2.1 Allegations that may meet the harms threshold

This aspect of the policy relates to managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children/students in their present position, or in any capacity.

Consideration will be made as to whether the allegation meets the following criteria. Has the person (anyone working in the college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors):

- Behaved in a way that has or may have harmed a child/student and/or
- Possibly committed a criminal offence against or related to a child/student and/or;
- Behaved towards a child/student or children/students in a way that indicates that he or she may pose a risk of harm to children/students and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/students.

The last bullet point above includes behaviour that may have happened outside of college, that might make an individual unsuitable to work with children/students, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Advice will be sought from the local authority designated officer (LADO).

Initial response to an allegation

Where the college identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child - the Designated Safeguarding Lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.

2. Investigating and supporting the person subject to the allegation – the Designated Safeguarding Leader will discuss with the Designated Officer (LADO), the nature, content and context of the allegation, and agree a course of action.

Any allegation of abuse made against a teacher or other member of staff or volunteer in college will be dealt with quickly and in a fair and consistent way, providing effective protection for the child/student, whilst at the same time supporting the person who is the subject of the allegation.

In all cases common sense and judgment will be used when dealing with allegations.

After being informed of an allegation against a member of staff, the Designated Safeguarding Lead will conduct basic enquiries in line with local procedures, before contacting the LADO, to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The Designated Safeguarding Lead will then consult the Manchester Designated Officer (LADO) immediately on 0161 234 1214. The purpose of an initial discussion is for the Designated Officer and the Designated Safeguarding Lead to consider the nature, content and context of the allegation and agree a course of action.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the Designated Safeguarding Lead, and the Designated Officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Designated Safeguarding Lead e should then consider with the Designated Officer what action should follow both in respect of the individual and those who made the initial allegation. The Designated Officer (LADO) Manchester can be emailed at qualityassurance@manchester.gov.uk

The person who reported the original concern will complete a report of the matter. The Designated Safeguarding Lead should inform the accused person about the allegation as soon as possible after consulting the Designated Officer (LADO).

No further action

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

Further enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO and Designated Safeguarding Lead should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the college's staff.

Where there is a lack of appropriate resource within the college, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator. Many local authorities provide for an independent investigation of allegations for schools that are maintained by the local authority, often as part of the HR/personnel services that schools and colleges can buy in from the authority. It is important that local authorities ensure that schools and colleges in that area have access to an affordable facility for independent investigation where that is appropriate.

The Designated Safeguarding Lead should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the

investigation continues. The LADO will provide advice and guidance to the college when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Procedure for dealing with allegations about supply teachers.

In some circumstances the college will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst the college is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances should the college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the college, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The College will usually take the lead because agencies do not have direct access to students or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by college, are under the supervision, direction and control of the governing body when working in the college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the college during the investigation.

When using a supply agency the college should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Procedure for dealing with complaints and allegations about the Principal.

If the Principal is subject to any such allegation or complaint, the Designated Safeguarding Lead will contact the Chair of Governors and Designated Governor (Sr.Patricia).

The nominated governor (Sr.Patricia) is responsible for liaising with the Local Authority and/or partner agencies in the event of allegations of abuse being made against the Principal.

Procedure for dealing with complaints and allegations about Governors.

If an allegation is made against a governor, the college should follow it's own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

If the Designated Safeguarding Lead is the subject of the allegation or complaint, the matter must be reported directly to the Principal or another member of the Senior Management Team.

Suspension

The Principal will, following College procedures, inform the member of staff that s/he may be suspended on full pay pending an investigation. The length of any suspension will be in line with College policies and will be as short as is possible while ensuring the safety of the student. Suspension is not an automatic response when an allegation is reported. All options to avoid suspension will be considered. It will be carefully considered whether the circumstances warrant suspension from contact with students, or until the allegation is resolved. Suspension will only be considered in cases where there is cause to suspect a child or other children at the college are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt the Designated Safeguarding Lead will seek views from the HR Manager and the LADO, as well as the police and children's social care where they have been involved.

Where the college is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the college, immediate action will be taken to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

The college has a clear policy on pay arrangements whilst the person is suspended or where there is an interim prohibition order in place.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the college, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

Based on advice from the HR department and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the college so that the individual does not have direct contact with the child/student concerned;
- providing an assistant to be present when the individual has contact with children/students;
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children/students;
- moving the child/student to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child/student concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent

professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the Designated Safeguarding Lead should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support.

Children's social care or the police may give their view to the LADO but they cannot require the Designated Safeguarding Lead to suspend a member of staff or a volunteer, although the Designated Safeguarding Lead should give appropriate weight to their views. The power to suspend is vested in the governing body who are the employers. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the children's social care, and/or an investigation by the police, the LADO should canvass police and children's social care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

Throughout the process, the HR department will maintain contact with the member of staff and offer appropriate support. Anyone suspended will be provided with a named contact person.

Further information regarding the duty of care that the college has to its employees and what support should be provided is detailed in Part 4 of Keeping Children Safe in Education.

Parents or carers of the student involved will be:

- formally told about the allegation as soon as possible. The Designated Safeguarding Lead will consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in college whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

Confidentiality and Information sharing

In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim (see Part 2 of Keeping Children Safe in Education for further guidance on information sharing)

Where the police are involved, wherever possible the college should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children/students named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

The college will make every effort to maintain confidentiality and guard against unwanted publicity while and allegation is being investigated of considered. The Education Act 2011 made it an offence for any person to publish any material that may lead to the identification of a teacher in a school/college who has been accused by, or on behalf of, a child/student from the same school/college. The reporting restrictions apply until the point that the accused person is charged with a relevant offence or the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. (For further information see Part 4 of Keeping Children Safe in Education)

The Designated Safeguarding Lead will take advice from the LADO, children's services and the police to agree the following:

- who needs to know and exactly what information can be shared;
- how to manage speculation, leaks and gossip.

Allegation outcomes

The following definitions should be used when determining the outcome of allegation investigation:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unsubstantiated: there is insufficient evidence to prove the allegation;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the college depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative (see below)

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff at the college, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Following a criminal investigation or a prosecution

The police should inform the LADO and the college immediately when:

- a criminal investigation and any subsequent trial is complete,
- it is decided to close an investigation without charge, or
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the Designated Safeguarding Lead whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false or malicious allegations

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead and the LADO should consider whether the child/student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the college, will consider whether any disciplinary action is appropriate against the individual in line with the college's Student Behaviour Policy.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience.

Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Designated Safeguarding Lead should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or college investigation where that is appropriate.

The college will not cease their investigation if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed. Other than where allegations are false, malicious, unsubstantiated, or unfounded,the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances the colleges could sometimes use a settlement agreement to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, the college should not be prevented from:

- fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Non-compliance of this duty is a criminal offence;
- providing a reference to potential employers when requested;
- considering whether to make a referral to the Teaching Regulations Agency where the criteria are met .

Record Keeping

Details of allegations that are found to not have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

Learning Lessons

At the conclusion of a case in which an allegation is substantiated, the designated officer(s) should review the circumstances of the case with the Designated Safeguarding Lead to determine whether there are any improvements to be made to the college's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer(s) and Designated Safeguarding Lead should consider how future investigations of a similar nature could be carried out without suspending the individual.

Non recent allegations

Where an adult makes an allegation to the college that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child/student, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

3.2.2 Allegations/concerns that do not meet the threshold (low level concerns).

The Governing bodies have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The college has appropriate processes in place to manage and record any such concerns and take appropriate action to safeguard students.

Low level concerns

As part of our whole college approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. We acknowledge the critical importance of creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. Maintaining an open and transparent culture will enable the college to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the college are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct
- outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious
- enough to consider a referral to the LADO. Examples of such behaviour could include,
- but are not limited to:

    - -being over friendly with children;
    - -having favourites;
    - -taking photographs of children on their mobile phone;
    - -engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
    - -using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of college from potential false allegations or misunderstandings.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to Andrea Pritchard, Designated Safeguarding Lead and Deputy Principal. Where concerns relate to supply staff and contractors the Designated Safeguarding lead will notify their employers, so any potential patterns of inappropriate behaviour can be identified. The Principal is the ultimate decision maker in respect of all low-level concerns.

Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns should be recorded in writing and stored in individual staff files with HR. The record should include:

- details of the concern,
- the context in which the concern arose,

- action taken,
- the name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records are confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of such behaviour is identified, the college will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. This information will be retained at least until the individual leaves their employment with the college.

References

Keeping Children Safe in Education is clear that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns

Following the report of a low level concern the Designated Safeguarding Lead will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decision and action taken.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s)(LADO). In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Oversight and monitoring

The designated officer(s) (LADO) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the Manchester Safeguarding Partnership) on the subject. The designated officer(s) (LADO) will provide advice and guidance to the Designated Safeguarding Lead in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the designated officer(s) (LADO);
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Whistle-blowing

The public interest disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matter. These are called “qualifying disclosures”. A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment

a breach of any other legal obligation or concealment of any of the above...is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such and act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The worker has no

responsibility for investigating the matter – it is the organisation's responsibility to ensure that an investigation takes place.
A worker who makes such a protected disclosure has the right not to be dismissed, or subjected to victimization, because he/she has made the disclosure.
The College encourages workers to raise their concerns under this procedure in the first instance. If a worker is not sure whether to raise a concern, he/she should discuss the issue with his/her line manager or the personnel department.

The NSPCC Whistleblowing helpline can be contacted by staff who do not feel able to raise concerns regarding children protection failures internally. The NSPCC can be contacted on 0800 028 0285 or email help@nspcc.org.uk. Posters displaying this information can be found in all staff rooms. The staff room noticeboards direct staff and volunteers to the college Whistle-blowing policy.

For further information, see Whistle-blowing Policy

https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/

4. Safer Recruitment Procedures

Loreto College is committed to Safeguarding and promoting the welfare of children/students and young people and expects all staff and volunteers to share this commitment. The college places the Safer Recruitment of Staff as the highest priority along with all other Safeguarding and Child Protection policies and Procedures and will prevent unsuitable people from joining the workforce. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking DBS checks. At least one person involved in undertaking interviews will be safer recruitment trained. All new starters receive an introduction to the college safeguarding policies and procedures as part of their induction. This includes how to share information appropriately, safely and in the best interests of the student.

For further information, see Recruitment and Selection Policy, Equal Opportunity Policy, DBS Policy.

PART 2

Safeguarding Practice Guidance

Appendix A

A.1 Definitions of abuse

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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 that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Children: includes everyone under the age of 18.

Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.
Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those know to them or by other (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Children in particular, but also some adults, may not disclose abuse, neglect and exploitation directly, or may do so through unusual behaviour or comments. This can make identifying abuse, neglect and exploitation difficult for professionals across agencies.

Transitional Safeguarding:

Is a term used to highlight the need to improve the safeguarding response to older teenagers and young adults in a way that recognises their developmental needs. There are several reasons why a more fluid and transitional safeguarding approach is needed for young people entering adulthood. These are summarised as:

- Adolescents may experience a range of distinct risks and harms, and so may require a distinctive safeguarding response.
- Harm, and its effects, do not stop at the age of 18.
- Many of the environmental and structural factors that increase a child's vulnerability persist into adulthood, resulting in unmet needs and costly later interventions.
- The children's and adults' safeguarding systems are conceptually and procedurally different, and governed by different statutory frameworks, which can make the transition to adulthood harder for young people facing ongoing risk and arguably harder for the professionals who are trying to navigate an effective approach to helping them.

- Young people entering adulthood can experience a 'cliff-edge' in terms of support, exacerbated by the notable differences between thresholds / eligibility criteria of children's and adults' safeguarding.

Effective safeguarding and identifying abuse requires the use of **professional curiosity**; which is described as 'applying critical evaluation to any information received and maintaining an open mind'. Manchester Safeguarding Partnership disseminate local learning following Serious Case Reviews to improve practice using 7-minute briefings. The Safeguarding Team use the short briefings to likewise reflect on current practice and knowledge.

There are four key categories of abuse:

Physical abuse: a form of abuse that 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: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children/students. 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic

emotional needs. Where a child is seen as being at risk of neglect of maltreatment and poor outcomes intervention is sought to challenge poor parenting. Manchester Safeguarding Partnership are currently updating the Neglect Strategy 20-21

Manchester City Council, along with many other local authorities, has adopted the Signs of Safety practice framework for all of its work with children and families. The framework is used to consider what is working well, what could be better (the worries), what needs to happen for individual children and assess both the risk and safety where there are concerns about possible abuse. This format is echoed in statutory meetings and reports. The Safeguarding team work closely with students known to the local authority to capture the 'voice of the child' using the Signs of Safety framework.

Signs and symptoms

The signs and symptoms of abuse are many and varied and are often difficult to distinguish from indicators that occur from a non-abusive accident, incident or experience. For students with a disability, determining whether a sign or symptom that causes concern is a result of abuse can be very difficult. **However, all members of the college are obliged to remain highly vigilant at all times and report any concerns they have immediately.**

Contextual Safeguarding and extra-familial harm

This is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. Contextual safeguarding seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. Manchester Safeguarding Partnership recognise the importance of a contextual safeguarding approach and have been able to identify emerging issues, often of a significant nature, and respond much more effectively as a result of looking beyond individual young people.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that Loreto provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Additional information is available from the Contextual Safeguarding website:
https://contextualsafeguarding.org.uk/

The following sections describe the necessary practice required to be in place to safeguard and protect students. It addresses safeguarding and protection across several dimensions and contexts and considers threats to students' well-being in their various forms

Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and/or persistent absence from education, serious violence (including that linked to county lines) radicalisation consensual and non-

consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of are detailed below:

A.2 Further information on so called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

A.2.1 Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Actions

If staff have a concern they should activate college safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff should discuss any such case with the designated safeguarding lead and involve children's social care as appropriate.

Indicators that may present in an educational setting could include:

- severe pain
- excessive bleeding (haemorrhage)
- fever
- infections e.g., tetanus
- urinary problems (painful urination, urinary tract infections)
- menstrual problems (painful menstruations, difficulty in passing menstrual blood, etc.)
- need for later surgeries
- psychological problems (depression, anxiety, post-traumatic stress disorder, low self-esteem, etc.).

A.2.2 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

Possible Indicators of Forced Marriages

- Truancy
- Decline in performance or punctuality
- Low motivation at college
- Poor exam results
- Being withdrawn from college by those with parental responsibility
- Not allowed to attend extracurricular activities

If you are concerned that a student is being forced to marry immediately contact the Designated Safeguarding Lead for referral to the appropriate social services agencies.

If a case of forced marriage is suspected it will be viewed as a safeguarding concern, parents and carers will not be approached or informed about a referral to any other agencies.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at
The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) <Click to follow link>

The Forced Marriage Unit can be contacted for advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

A.3 Further information on Preventing Radicalisation

Students may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms or abuse, protecting children from this risk is part of the college's safeguarding approach.

To be read in conjunction with the Loreto College 'Prevent' policy which includes further information on the Prevent Duty, updated referral forms (published in July 2020) and the College Prevent Risk Assessment

Protecting children/students from the risk of radicalisation is seen as part of Loreto's wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence..
- Extremism is the vocal or active opposition to our fundamental values, including 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 a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a childis likely to be susceptible to radicalisation into terrorism, there are factor that may indicate concern.

However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with managing other safeguarding risks, staff should be alert to changes in student's behaviour which could indicate that they may be in need of help or protection. College staff should use their professional judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

The Designated Safeguarding Lead will consult and work with the local PREVENT team, with regard to radicalisation concerns regarding both students and staff to identify actions that should be taken to redress any concerns about child safety and welfare including protecting students and staff from

extremist views, vocal or active, which are opposed to fundamental British values. All opinions or behaviours which are contrary to these fundamental values and the ethos of the College will be vigorously challenged.
Loreto College is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding agencies.

The college will at all times take into account the duty it has to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty still applies even when students are no longer part of the Loreto community. The college will pass on any relevant information to external bodies, as appropriate, to comply with the duty.

The Department for Education has a helpline for anyone concerned about a child who may be at risk of extremism, or about extremism within an organisation working with children and young people. Email: counter.extremism@education.gsi.gov.uk or telephone 020 73407264.

A.3.1 Incel

Incel is an abbreviation of "involuntary celibate".

Incels are an online community built around sexuality whose members are mostly men who wish to, but do not, have sexual relations with women. Members of the community share a sense of being both sexually and romantically undesirable, which leads to a self-definition as victims of women and society, and hatred towards an online imagined community/community of practice who wish to, but do not, have sexual relations with women. Owing to this identity, they view themselves as non-normative within broader society and see women and societal standards of masculinity as the cause of their problems.

The college will seek support from Channel and make a referral to Prevent where there are concerns about vulnerability to or interest in Incel in line with local safeguarding procedures.

Some authorities have begun to treat the ideology as a more serious terrorism threat. Men who call themselves involuntary celibates have carried out mass killings in North America. It is a growing concern in the UK.

A.4 Further information on Children Missing

A.4.1 Child Missing or Absent from Education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

Children absent or missing from College, particularly repeatedly, can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or

exploitation and child criminal exploitation or 'county lines'. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Loreto informs Manchester/the relevant LEA of any student who is going to be withdrawn from the admission register where they:

- have been taken out of college by their parents and are being educated outside the college system e.g. home education;
- have ceased to attend college and no longer live within reasonable distance of the college at which they are registered;
- have been certified as unlikely to be in a fit state of health to attend college;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the college at the end of that period; or,
- have been permanently excluded.

Staff must follow the Attendance Procedures to ensure that attendance is carefully monitored and tracked.

A.4.2 Children Missing from Home or care

When a child goes missing or runs away from home, care or school/college, they are at risk. Many children/students will exhibit normal adolescent behaviour in testing boundaries and it is not helpful to consider every incident of lateness or absence for all people as high risk. Young people must not be reported missing as a behaviour management tool. However, some children/students will need to be treated as missing immediately due to their vulnerability.

Definitions and Explanation of Terms

Missing: Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another. Absent: A person not at a place where they are expected or required to be and where the circumstances and context suggest there is a lower level of risk.

Away from Placement without Authorisation: a looked after child whose whereabouts is known but who is not at their placement or place they are expected to be and the carer has concerns or the incident has been notified to the local authority or the police. These children/students would not be treated as either 'missing' or 'absent' under the police definitions as their whereabouts is known even though it may be cause for concern.

Looked After: A child is “looked after” by a local authority if he/she is “in care” by reason of a court order, or if he / she is provided with accommodation for more than 24 hours by agreement with her/his parents or with the child if he / she is aged 16 or more.

Accommodated: A child is accommodated if he / she is looked after by the Local Authority with the voluntary agreement of his/her parents, or with the child if he/she is over 16 years old.

A.5 Further information on Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Different forms of harm can overlap, and perpetrators may subject young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children may be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE may happen without the child’s immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of them performing, and/or another or others performing on them, sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Please see the Student Behaviour Policy for guidance on searching students

See Home Office guidance: Child sexual exploitation: guide for practitioners.

Indicators could include:

- Disclosure of serious sexual assault and then withdrawal of statement
- Unaccounted for monies or goods
- Associating with unknown adults
- Sexually transmitted infections
- Staying out overnight with no explanation

Facts and myth busters about child criminal exploitation:

1. It isn't all about drugs

Criminal exploitation of children can take many forms. It is often talked about in the news in terms of 'county lines' - being coerced into moving and selling drugs across the country. However, it also includes being forced to shoplift or pickpocket, work in cannabis factories, or threaten other young people.

2. Online music videos are hunting grounds for exploiters

Children can be targeted for exploitation face-to-face or online through social media and other platforms. Criminal groups will use popular culture such as online music videos to contact and groom young people.

3. All children are at risk, no matter their background

Any child can be at risk of exploitation, no matter their family network, socio-economic background or neighbourhood. However, certain vulnerabilities can place children at greater risk. These include growing up in poverty, having learning difficulties, being excluded from college or being a looked after child.

4. Drugs aren't only a problem in big cities

Practitioners and police report increasing awareness of young people being exploited through 'county lines' - the distribution of drugs around the country using phone 'lines'. There are thousands or drug trafficking routes to all areas of the country.

5. Children as young as seven are being exploited

There is evidence that children as young as seven are being targeted for exploitation. Although older adolescents are more likely to be recorded, many younger children are not recognised and therefore the opportunity to protect them is missed.

6. Signs of exploitation are not obvious

There are many signposts to suggest a child is being exploited (link). One indicator could be if the young person is going missing from home or care. Children in care go missing more frequently than other children and are more likely to be found outside of the boundaries of their home local authority.

7. Exploited children are not treated equally

Gender, age, ethnicity and background can all affect the way professionals respond to children who have been or are at risk of being criminally exploited. Some may be recognised as victims while others are not.
(Children's Society)

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

A.5.1 Further information on County Lines

Child criminal exploitation is common in 'county lines' and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal exploitation does not always involve physical contact' it can also occur through the use of technology. Criminal exploitation is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft (Home Office Criminal Exploitation of children and vulnerable adults: County Lines guidance September 2018).

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children/students and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children/students can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children/students are also increasingly being targeted and recruited online using social media. Children/students can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children/students are involved in county lines. Some additional specific indicators that may be present where a child/student is criminally exploited through involvement in county lines are children/students who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's/student's involvement in county lines is available in guidance published by the Home Office.

A.6 Modern Slavery and the National Referral Mechanism

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

Further information on the signs that someone may be a victim of modern slavery and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims.

Child Trafficking

Young people (under 18) are moved either internationally or domestically so they can be exploited. Child trafficking is the bringing of children into the country, sometimes without proper immigration arrangements, for a variety of illegal purposes which can include domestic service, illegal adoption, organ harvesting, benefit claims or prostitution. Such children may have little English. The police or local authority children's social care service should be contacted immediately if staff become aware of a trafficked child.
Trafficked children may not show any obvious signs of distress or imminent harm, but they may be vulnerable to particular types of abuse and may continue to experience the effects of their abuse in the future.

Physical abuse can include:
- Beatings
- Being subdued with drugs, on which they then become dependent
- Alcohol addiction and
- Stress/post-traumatic stress-related physical disorders such as skin disease, migraine and backache.

Some forms of harm might be linked to belief in spirit possession. Safeguarding Children from Abuse Linked to a Belief in Spirit Possession (2007) is intended to help address the particular needs of children abused or neglected because of a belief in spirit possession.

Some kind of emotional abuse is involved in all types of maltreatment of a child, including trafficking. Trafficked children may:

- Feel disorientated after leaving their family environment, no matter how impoverished and difficult. This disorientation can be compounded for some children who have to assume a new identity or have no identity.
- Feel isolated from the local community in the UK by being kept away from college and because they may not be able to speak English.
- Fear both the adults who have physical control of them and the threat that they will be reported to the authorities as immigration criminals.
- Lose their trust in all adults.
- Have low self-esteem and believe that the experience has ruined them for life psychologically and socially. They may become depressed or suicidal.
- Worry about people in their families and communities knowing what has happened to them, and become afraid to go home; and
- Feel like criminals as a result of the new identity forced on them, which can have long-term consequences for their adult lives.

Children who have been trafficked may be sexually abused as part of being controlled or because they are vulnerable. In many cases, sexual exploitation is the purpose of the trafficking.
Trafficked children may also suffer neglect. In particular they may not receive routine and emergency medical attention. They may also be subject to physical, sensory and food deprivation.

Forced Labour/Debt Bondage

Victims are forced to work to pay off debts that realistically they never will be able to. Low wages and increased debts mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children.

Forced Labour

Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence to them or their families. It can happen in many sectors of our economy, from mining to tarmacking, hospitality and food packaging.

Sexual Exploitation

Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Whilst women and children make up the majority of victims, men can also be affected. Adults are coerced often under the threat of force, or another penalty.

Criminal Exploitation

Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will. This may also involve ‘county lines’ when gangs and organised crime networks exploit children to sell drugs using dedicated mobile phone ‘lines’ to supply drugs.

Domestic Servitude

Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

A.7 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but areenabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
  making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where youngpeople are at risk of committing, or being drawn into, low level cyber-dependent offencesand divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud,purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' andNational Cyber Security Centre - NCSC.GOV.UK

A.8 Further information on Fabricated or induced illness

Please also see local procedures and MMASA document on Fabricated and induced illness. The fabrication of illness in children is a relatively rare form of abuse. Where concerns exist, it requires professionals from all agencies to work together at an early stage so that all information available can be evaluated and an understanding of the needs of the child assessed.

Indicators could include:

- A carer reporting symptoms and observed signs that are not explained by any known medical condition;
- A carer reporting to professionals that a diagnosis has been made by another professional when this is not true, and giving conflicting information to different professionals;
- Missed appointments especially if the appointments are not leading in the desired direction for the carer;
- Physical examination and results of investigations that do not explain symptoms or signs reported by the carer;
- The child having an inexplicably poor response to prescribed medication or other treatment, or intolerance of treatment;
- Acute symptoms that are exclusively observed by/in the presence of the carer;
- On resolution of the child's presenting problems, the carer reporting new symptoms or reporting symptoms in different children in sequence;
- The carer seeking multiple opinions inappropriately.

In the majority of cases of identifying FII, there will be uncertainty and insufficient evidence to confidently identify abuse or the nature of the risk (if any) to the child may be unclear.

- Complete a chronology, listing what is evidence-based. This should be started before a referral to children's social care unless the concerns are urgent or there is already evidence of significant harm;
- Listing inconsistencies and gathering more information from family members and other professionals to clarify inconsistencies;
- Continuing to observe child and family - are patterns emerging?
- Keeping detailed records: being specific about the evidence base/source of information - for example, observation, informed opinion, hearsay, etc.
  Continuing to re-assess the situation in light of new information.

It is usually not appropriate to share concerns about FII with parents at an early stage, but plans need to be agreed regarding the appropriate response to manage concerns in order to protect the child. Also, what it is or is not appropriate to discuss with the parents depending on circumstances but trying to be as open and transparent as possible needs to be agreed and documented between the different agencies /professionals involved.

A.9 Further information on Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Students can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic abuse is defined as:

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

Honour-based violence and abuse, forced marriage and female genital mutilation are all forms of domestic abuse.

The Domestic Violence Act 2021 legally recognises that children who are related to the abused or abuser and who see, hear, or experience the effects of the abuse as victims in their own right.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Loreto College is aware the students' development, as well as their social and emotional resilience, is affected by many factors including exposure to domestic abuse within the family situation and is a safeguarding issues.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children and young people react to domestic abuse in similar ways to other types of abuse and trauma.

Information about domestic abuse and its effect upon children and young people will be incorporated into staff Safeguarding training and the College's Safeguarding Policies and Procedures will be used to protect children and young people exposed to, and at risk from, domestic abuse.

Any child or young person thought to be at immediate risk will be reported to the police service as a 999 emergency and relevant Children's Social Services will be contacted as soon as possible.

Manchester City Council have identified Domestic Abuse as a key safeguarding issue for the city. The Domestic Violence and Abuse Strategy 2021 recognises that there is no 'typical' domestic abuse victim and no 'typical' perpetrator. It can affect anyone, regardless of:

- age
- disability
- gender identity

- marriage or civil partnership status
- pregnancy or maternity
- race
- religion or belief
- sex
- sexual orientation
- caring responsibilities.

A.9.1 Operation Encompass

Operates in the majority of police forces across England including Greater Manchester. It helps police, schools and colleges work together to provide emotional and practical help to children.

The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (member of the safeguarding team) in college before the student or students arrive at college the following day. This ensures that the college has up to date relevant information about the student's circumstances and can enable support to be given to the student according to their needs.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

The college Encompass email address is encompass@loreto.ac.uk

Safeguarding Team have completed the Operation Encompass training from Virtual College and respond to all incident notifications.

A.10 Further information on Peer on Peer Abuse

Loreto College acknowledge the recent move away from references to 'peer on peer abuse' and instead the use of 'child-on-child' abuse has been introduced. Loreto College will continue to refer to 'peer-on-peer abuse' as this better reflects the age group of young people with which we work. It is felt a more appropriate term to encompass our young people, many of whom become legal adults whilst students at the college - this also makes clear that we will treat all students the same way.

Children/students can abuse other children/students. It can happen both inside and outside of college and online. This can include (but is not limited to)

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

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

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.

Professionals should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

Professionals should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or at risk of suffering, significant harm and in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should understand, that even if there are no reports in college it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

A.10.1 Sexual Violence and sexual harassment

Loreto College recognise that children are capable or abusing their peers. This can take place inside or outside of college and online. The application of the Student Behaviour Policy by all staff minimises the risk of peer-on-peer abuse.

Sexual violence and sexual harassment can occur between two young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single young person or group of young people.

Students are taught to understand the issue and meaning of consent as delivered in the tutorial program. Students will be made aware of what constitutes unreasonable pressure from peers to engage in risk-taking or inappropriate behaviour, and how to report their concerns.

Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Victims should be kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Students should be aware that some groups are potentially more at risk. Evidence shows girls, students with SEND and lesbian, gay, bisexual students or students questioning their gender are at a greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will
- never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”,
- “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms,
- breasts and genitalia, flicking bras and lifting skirts. Dismissing or tolerating
- such behaviours risks normalising them.
- Understanding that all of the above can be driven by wider societal factors beyond the college, such as everyday sexist stereotypes and everyday sexist language. Therefore, a whole college approach, including preventative education, is important.

What is Sexual violence and sexual harassment?

Sexual violence

It important that college staff are aware of sexual violence the fact students can, and sometimes do, abuse their peers in this way. When referring to sexual violence we do so in the context of child-on-

child sexual violence and we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally
- penetrates the vagina or anus of another person (B) with a part of her/his body or
- anything else, the penetration is sexual, B does not consent to the penetration and A
- does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature'

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

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making
- sexual remarks about clothes and appearance and calling someone sexualized names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - non-consensual sharing of sexual images and videos;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media; and
    - sexual exploitation; coercion and threats

Reporting

Robust systems have been established in college for dealing with safeguarding concerns. We have a zero-tolerance approach to sexual violence and sexual harassment. All allegations of abuse, neglect and exploitation whether suspected or known will be treated seriously and with confidentiality. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We will respond and manage any reports of sexual violence and/or sexual harassment in line with guidance added to KCSIE 2025 and within the MSP website.

All disclosures of allegations of peer-on-peer abuse will be recorded electronically on the students safeguarding file and only detailing the facts as the student presents them.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a student is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain and reassure that the law is in place to protect young people rather than criminalise them.

The college is aware of how incredibly important the initial response to a report from a child is and how this can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

In some cases, the victim may not make a direct report (another student may make a report or staff may overhear a conversation that suggests a child has been harmed). It is important for the college to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of children's social care if required. Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to.

There may be reports where the alleged sexual violence or sexual harassment involves students from the same school or college, but is alleged to have taken place away from the school or college premises, or online. There may also be reports where the students concerned attend two or more different schools or colleges. The safeguarding principles, and individual schools and colleges duties to safeguarding and promote the welfare of their pupils and students, remain the same.

If staff have a concern about a student or a student makes a report to them, they should follow the College disclosure referral process.

When there has been a report of sexual violence the Designated Safeguard Lead (or a deputy) will make an immediate risk and needs assessment (See Appendix H). Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the college.

Important considerations will include:

- the wishes of the victim 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 progressed and any support that they will be offered. This will however need to be balanced with the college's duty and responsibilities to protect other students.

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the students involved
- the developmental stages of the students involved
- any power imbalance between the students. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. 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 children involved/impacted).

There are four likely scenarios for the college to consider when managing any reports of sexual violence and/or sexual harassment. Decisions and actions will be reviewed and relevant policies updated, where necessary, to reflect lessons learnt.

Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the college may take the view that the student's concerns are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, with due consideration of the behaviour policy and by providing pastoral support.
- The response of the college will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated
- All concerns, discussions and reasons for decisions should be recorded.

Early Help

The college may decide that the students involved do not require statutory interventions, but may benefit from early help. Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. 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 harmful sexual behaviour and may prevent escalation of sexual violence
Full details of the early help process are in Working Together to Safeguarding Children. Multi-agency early help will work best when placed alongside strong college policies, preventative education and engagement with parents and carers.

All concerns, discussions and reasons for decisions should be recorded.

Referrals to children's social care

- Where a child have been harmed, is at risk of harm, or is in immediate danger college should make a referral to local children's social care.
- At the referral to children's social care stage, college 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 children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the college will work alongside and cooperate with the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.
- Colleges should not wait for the outcome (or even the start) of a 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 children's social care (and other agencies as required) to ensure any actions the college takes does not jeopardise a statutory investigation.
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The 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.
- The response of the college will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
- All concerns, discussions and reasons for decisions should be recorded.

Reporting to the police

- Any report to the police will generally be in parallel with a referral to 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 should be passed on to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
- At this stage college 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 child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the college is supporting the child in any decision they take. This should be with the support or children's social care and any appropriate specialist agencies.
- Where a report has been made to the police, the college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and

their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

- Whilst protecting children's and/or taking any disciplinary measures against the alleged perpetrator(s) the college will continue to work closely with the police (and other agencies as required) to ensure any actions the college take do not jeopardise the police investigation.
- 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 school or college continue to engage with specialist support for the victim as required.
- The response of the college will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated
- All concerns, discussions and reasons for decisions should be recorded.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances the college will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

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 with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.

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.

Whatever arrangements are in place, the college will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within the institution.

Particular regard will 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.).

Careful liaison with the police investigators should help to develop a balanced set of arrangements.

Managing any delays in the criminal process

There may be delays in any case that is being progressed through the criminal justice system. Loreto 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.

The end of the criminal process

If a student is convicted or receives a caution for an offence, the college will update its risk assessment, ensure relevant protections are in place for all the students at the college and, if not already done so, consider any suitable action in line with the behaviour policy. This process will include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same college as the victim, the college will be very clear as to the expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the college. The college will ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

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 college will 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. The college will 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.

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 concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the college, will consider whether any disciplinary action is appropriate against the individual who made it as per the student behaviour policy.

Ongoing Response

The college will support and work with students who report sexual violence or sexual harassment to make their daily experience as normal as possible, so that the college is a safe space for them. Support will be tailored on a case-by-case basis and students will be provided with details of external agencies available for further support.

The college will safeguard and support alleged perpetrators of sexual violence or sexual harassment. The college has a difficult balancing act to consider the need to safeguard a victim and provide an education and safeguarding support to an alleged perpetrator. The college will also carefully consider appropriate sanctions following the student behaviour policy.

For further information see 'Sexual violence and sexual harassment between children in schools and colleges' Department for Education, September 2021.

After recent government action to tackle the issues raised by testimonies given on the Everyone's Invited website, the NSPCC has been commissioned to run the helpline that we publicise in college and on our website – 0800 136 663. This number is for young people who are victims of sexual abuse, adult victims, parents and carers of victims and professionals working with children and young people. It is to report or share incidents which have happened both in and outside of educational settings.

A.10.2 Sharing of nudes and semi-nudes images and/or videos

For further information see Sharing Nudes and semi-nudes, UK Council for Internet Safety, Sexual violent, sexual harassment between children in schools and colleges, Department for Education (September 2021).

This refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline.

The types of incidents which this refers to are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and colleges should always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019
and s.67A of the Sexual Offences Act 2003.

Colleges may respond to incidents without involving the police. Please refer to 'Responding to incidents and safeguarding young people' below.

The police may, however, need to be involved in cases to ensure thorough investigation including collection of all evidence (for example, through multi-agency checks), and there are incidents, highlighted in this advice, which should always be referred to the police.

Even when the police are involved, however, a criminal justice response and formal sanction against a young person would only be considered proportionate in certain circumstances.

When an incident involving youth produced sexual imagery comes to college's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate college staff.
- There should be subsequent interviews with the young people involved (if appropriate),

- Parents should be informed at an early stage and involved in the process unless there is a good reason to believe that involving parents would put the young person at risk of harm.
  At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in college, or any member of college staff.
They may report through an existing reporting structure, or a friend or parent may inform someone in college, or inform the police directly.

All members of staff (including non-teaching staff) should be aware of how to recognize and refer and disclosures of incidents involving youth produces sexual imagery.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in college is a last resort and they may have already tried to resolve the issue themselves.

Defining the incident

Finkelhor and Wolak's typology of youth-produced imagery cases can be used to define and assess incidents according to motivations.

Incidents can broadly be divided into two categories:

- aggravated: incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
    - adult involved: adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders
    - youth only – intent to harm: these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people
    - youth only – reckless misuse: no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result

- experimental: incidents involving the creation and sending of nudes and seminudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
    - romantic: incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
    - 'sexual attention seeking': the phrase 'sexual attention seeking' is taken directly from the typology however it is important to note that incidents within this category

can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image

- other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives

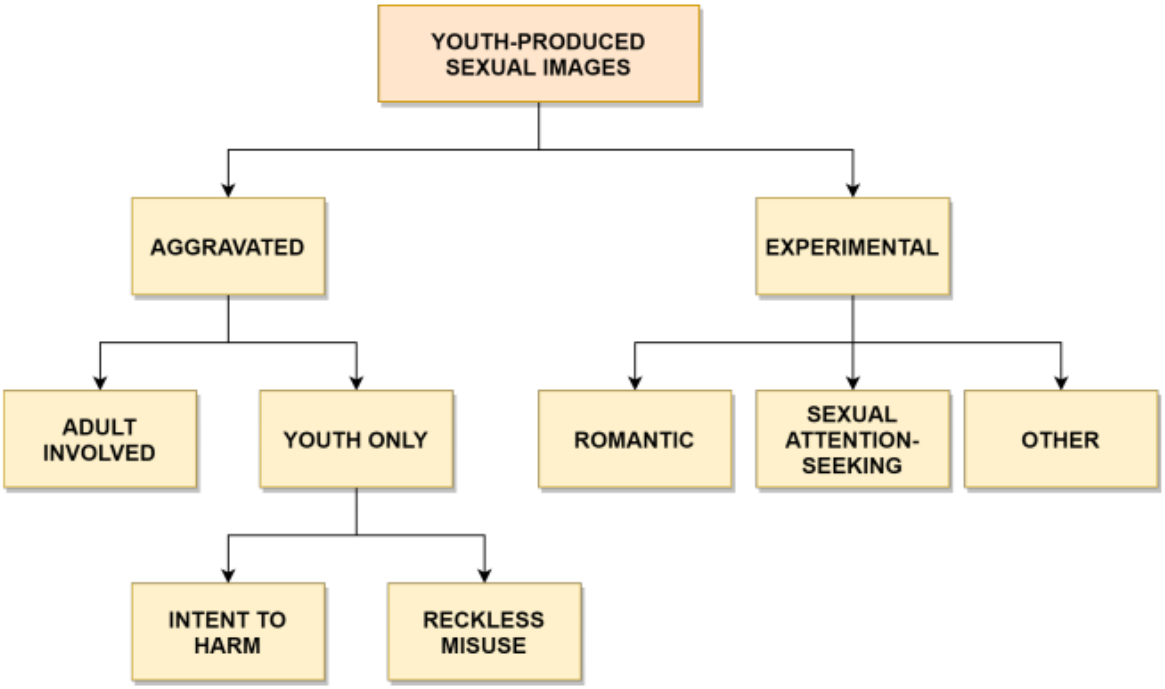


Fig 1: Sexting, a typology (Finkelhor and Wolak)

Fig 1: Sexting, a typology (Finkelhor and Wolak)

Responding to incidents and safeguarding young people

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or your people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery 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 from devices or online services.
- Any relevant facts about the young people 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 should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the imagery suggest the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
4. The imagery involves sexual acts and any student in the imagery is under 13-17
5. You have reason to believe a young person is at immediate risk to harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply, then college may decide to respond to the incident without involving the police or children's social care (college can choose to escalate the incident at any time if further information/concerns come to light).

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no malice, it is usually appropriate for the college to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and or children's social care.

If there are doubts about whether to involve other agencies a referral should be made to the police.

Assessing

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the student in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

A.10.3 Upskirting

The Voyeurism (Offences) Act came into force on 12 April 2019. 'Upskirting' is where someone who operates equipment or records an image under another person's clothing (without that person's consent or a reasonable belief in their consent) with the intention of viewing, or enabling another person to view, their genitals or buttocks (with or without underwear), in circumstances where the genitals, buttocks or underwear would not otherwise be visible, where the purpose is to obtain sexual

gratification or to cause humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

A.10.4 Bullying

Bullying will not be tolerated at Loreto College. Any reported incidence of bullying will be treated seriously and thoroughly investigated.

Please refer to the Loreto College Anti-bullying policy for procedures to be followed when encountering incidents of bullying.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children/students, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously a college's first priority but emotional bullying can be more damaging than physical; teachers and schools/colleges have to make their own judgements about each specific case.

Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

A.10.5 Cyber-bullying

The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside college. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

The wider search powers included in the Education Act 2011 give teacher's stronger powers to tackle cyber-bullying by providing a specific power to search for and, if necessary, delete inappropriate images (or files) on electronic devices, including mobile phones.

A.10.6 Serious Violence and Gangs

All staff should be aware of the indicators, which may signal students are at risk from, or are involved with serious violent crime. These may include increased unexplainable and/or persistent absences from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Some young people go through a period when being in a group is a key part of forming their sense of identity, building social skills and support networks. Being part of a group can a powerful and positive experience. Sometimes however the group progresses to causing harm, even crime. The use of the term 'gang 'can be misleading, and unintentionally and unhelpfully glamourise or reinforce the group identity.

College staff, by listening to students, parents and families, will be able to judge how significant the signs are as indicators that students are at risk from, or are involved with serious violent crime. Staff will then follow safeguarding procedures.

Gang members may groom girls using drugs and alcohol, which act as disinhibitors and also create dependency, and encourage / coerce them to recruit other girls through college / social networks. See A.5 Child Sexual Exploitation.

Students who are involve in gang activity or serious youth violence often also experience criminal exploitation. These young people will often go missing for days at a time, as they are trafficked around the country by gangs. The number of children who go missing and are exploited through 'county lines' is not known. Some of them may not even be reported as missing to the police because of fear of gangs. See A.6 Child Criminal Exploitation.

Loreto College recognises that being part of a gang can create a serious safeguarding threat to some students. Loreto works closely with the Police, Children's Services, Youth Offending Teams, Complex Safeguarding Hub and other relevant agencies to protect and support students.

Indicators

- Child withdrawn from family;
- Increased unexplainable and/or persistent absence from college. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice);
- Being emotionally 'switched off', but also containing frustration / rage;
- Starting to use new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason, or breaking parental rules consistently;
- Sudden change in appearance – dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries, and/or refusal to seek / receive medical treatment for injuries;
- Graffiti style 'tags' on possessions, college books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Breaking off with old friends and hanging around with one group of people;
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members;
- Starting to adopt certain codes of group behaviour e.g., ways of talking and hand signs;
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past;
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhoods.

An important feature of gang involvement is that the more heavily a child is involved with a gang, the less likely they are to talk about it. There are links between gang-involvement and young people going missing from home or care (See A.4.2). Some of the factors which can draw gang-involved young people away from home or care into going missing can come through the drugs markets and 'drugs lines' activity. There may be gang-associated child sexual exploitation and relationships which can be strong pull factors for girls. Exploitation is at the heart of this activity, with overt coercion taking place alongside the pull factors of money, status, affection and belonging.

For more information please see:

- Serious Violence Duty

- Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office

- Greater Manchester Serious Violence Action Plan

- Youth Endowment Fund – Home Office

- Tackling Violence Against Women and Girls July 2021 - Home Office strategy

- Violence against women and girls: national statement of expectations for victims March 2022 - Home Office guidance

A.11 Further information on Mental Health

See Loreto Mental Health Policy, Department for Education guidance on Mental Health and behavior in schools and Supporting pupils at school with medical conditions .

Mental Wellbeing: describes your mental state- how you are feeling and how well you can cope with day-to-day life. Mental wellbeing is dynamic. It can change from moment to moment, day to day, month to month or year to year.

Mental Health: is also used to describe fluctuation in the way we feel and how well we cope. However, the term 'mental health' also refers to problems that are defined and classified to enable professionals to refer people for appropriate care and treatment.

One in 10 children and you people have a mental health problem, and one in four adults do too. Most mental health problems start in the teenage years. Mental health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse,neglect or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact on their mental health, behaviour and education throughout childhood, adolescence and into adulthood.

Loreto College seek to help students experiencing mental health difficulties access the support they need. The College provide access to a team of trained counsellors, a Chaplaincy team, Heads of Halls, a Wellbeing Officer and Faculty of Academic Support team to help students who require support with their mental wellbeing. **Staff at Loreto are NOT mental health specialists.** Staff however, are well

placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be a risk of developing one.

Loreto College have adapted the Manchester CAMHS Thrive framework to support the identification of mental health problems including routes to escalate and clear referral and accountability systems. Loreto College will assist other agencies involved in the support of students and contribute to CPA Review meetings.

See Loreto Mental Health Framework – Appendix K.

A.12 Further information on Children and the court system

Students are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The Young Witness booklet for 12-17 year olds explains each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/ywp-12-17-eng.pdf

There is also guidance available for parents/carers to make or change child arrangements at: https://helpwithchildarrangements.service.justice.gov.uk/

A.13 Further information on Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Prisoners families helpline; For help or advice please contact the Helpline on **0808 808 2003** (Freephone: including most mobiles). The Helpline is open 9am – 8pm Monday to Friday and 10am – 3pm Saturday, Sunday and bank holidays (excluding Christmas Day & Boxing Day).

https://www.nicco.org.uk/

A14. Homeless 16- and 17-year-olds.

Loreto College will follow procedures as outlined by Manchester Safeguarding Partnership when a 16 or 17-year-old is identified as Homeless or at risk of homelessness..

Guidance can be found at:
https://greatermanchesterscb.proceduresonline.com/chapters/p_ch_living_away_home.html#ch_fam_temp_accomm

- The safety and welfare of the young person is paramount
- Unless there is clear evidence to the contrary, the starting point will be that all children and young people are best off with their immediate families. Every effort should be made therefore to mediate between young people and their families to negotiate a return home
- Where young people are unable or unwilling to return to their immediate families; young people should be supported to explore wider family members and community options where their needs can be met

- Young people will be kept informed of progress and decisions made and are engaged in their assessment and plans
- Loreto will work with other agencies to assess and meet the needs of these young people and share information effectively
- A homeless or potentially homeless young person will have a Lead professional, who will be supported as appropriate by a multi-agency or professionals
- Where a young person is assessed as homeless and is unable to return home, Children's Social Care will be the lead agency and the primary legislation will be the Children Act 1989
- Whilst it is recognized that Bed and Breakfast accommodation is not suitable for 16–17-year olds, in some emergency circumstances young people will be accommodated in Bed and Breakfast accommodation to prevent street homelessness. These arrangements, however, will be exceptional, only used as a last resort to prevent street homelessness, and will be short term.

See Appendix M

Out of hours/emergency referrals

Where young people present as homeless outside of office hours, the priority must be the safety and wellbeing of the young person. A referral will be made to the Emergency Duty Service in Children's Social Care.

A.15 Substance misuse

Where concerns relating to substance misuse are identified Loreto College will seek to support students. Provision of external services varies by local authority. In Manchester Change Grow Live work with young people who are using or at risk of using drugs and alcohol. The family team also works with children affected by parental substance misuse and their parents to promote resilience and family unity. The Safeguarding Team can offer referrals toChange Grow Live for targeted support. Please also see Loreto College Anti-Drugs Policy and Student Behaviour Policy.

A.16 Hate Incidents

Any incident of Hate conducted by a student will be considered 'serious misconduct' and dealt with in line with Student Behaviour Policy. Loreto College will support students and families to report any incidents of Hate.

The Police and Crown Prosecution Service have agreed a common definition of hate incidents. They say something is a hate incident if the victim or anyone else think it was motivated by hostility or prejudice based on one of these **five personal characteristics**:

1. disability
2. race
3. religion
4. transgender identity
5. sexual orientation.

This means that if you believe something is a hate incident it should be recorded as such by the person you are reporting it to. All police forces record hate incidents based on these five personal characteristics.

Some police forces also record hate incidents based on other personal characteristics such as age. Greater Manchester Police now recognises alternative sub-culture hate incidents. These are incidents based on someone's appearance and include Goths, Emos, Punks and other similar groups. This means they will also record any such incidents as a hate incident.

When hate incidents become criminal offences they are known as hate crimes. A criminal offence is something which breaks the law.

Any criminal offence can be a hate crime if it was carried out because of hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation. Incidents which are based on other personal characteristics, such as age and belonging to an alternative subculture, are not considered to be hate crimes under the law. these can still be reported but will not be prosecuted specifically as hate crimes by the police and the Crown Prosecution Service.

For more information on hate crime see www.stophateuk.org

A.17 Further information on Online Safety

Please see the College's Online Safety Policy.

Loreto College has a User Code of Conduct, which recognises that online safety is a safeguarding issue not an ICT issue. The purpose of internet use in college is to help raise educational standards, promote student achievement, and support the professional work of staff as well as enhance the college's management information and business administration.

The internet is an essential element in 21st century life for education, business and social interaction and Loreto College has a duty to provide students with quality access as part of their learning experience.

The use of technology has become a significant component of many safeguarding issues. Child Sexual or Criminal exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorized into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, 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:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

It is the duty of Loreto College to ensure that every child and young person is in its care is safe and this applies equally to the 'virtual' or digital world.

Filtering and monitoring

Loreto College will ensure that appropriate filtering methods are in place to ensure that students are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material.

Use of social media on behalf of Loreto College must be approved prior to setting up sites.
A Social Media Site/Account Creation Approval Form must be completed and forwarded to a line manager.

It is essential that students are safeguarded from potentially harmful and inappropriate online material. An effective whole college approach to online safety empowers a college to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Loreto College work with Smoothwall to provide a web-based monitoring tool that monitors the digital activity of users of college devices. The software identifies terms and phrases associated with risk categories such as; mental health, violence, drugs, extremism, bullying and pornography. Smoothwall provide a team of behaviour analysts who alert the college to any concerns. Smoothwall are a member of the Internet Watch Foundation and implement the IWF CAIC list.

Smoothwall provide one of the layers of filtering at the college. Filtering policies are reviewed annually. The filtering alert system informs the safeguarding team when the network has blocked access to material online.

The DSL and Safeguarding Manager meet with the Strategic Manager for Information Systems and the college Network Manager throughout the year to review the filtering and monitoring system, as the online safety team.

Information security and access management

Communication with parents

The college seeks to promote the important of online safety with parents and makes available the information regarding the systems the college uses to filter and monitor online use on college devices both on and off site. As part of communications with parents/carers at the start of the college year the college will outline the range of online opportunities that their child may be invited to engage with as part of their experience across the college.

Students are directed to a range of online sites by the subject department, students are also encouraged in further independent research which may include use of websites or journal articles. College staff may interact with students online as part of remote provision. Parents/carers will be familiar with their child's teaching staff as this this information is made available through the parent portal. From time to time the college invite students to attend online talks to enhance curriculum or careers provision, these are often great opportunities. The college use Microsoft teams to host such events and appropriate safeguards remain in place.

Mobile phone use by students

The Online Safety Policy makes reference to the use of mobile and smart technology by students at the college. Any use of mobile devices in college by students must be in line with the Bring Your Own Device (BYOD) Policy. Whilst students are encouraged to use the student WIFI system it is acknowledged that many students have unlimited internet via mobile phone networks (3G, 4G and 5G) therefore their internet use can independent of the college systems.

Harmful online challenges and hoaxes

A hoax is a deliberate lie designed to seem truthful, and online challenges generally involve users recording themselves taking a challenge, and then distributing the video through social media channels, inspiring or daring others to repeat the challenge.

The DSL will check the factual basis of any harmful online challenge or online hoax with a known, reliable and trustworthy source, such as the Professional Online Safety Helpline from the UK Safer Internet Centre. Where harmful online challenges or online hoaxes appear to be local (rather than large scale national ones) local safeguarding advice, such as from the local authority or local police force, may also be appropriate and helpful.

Further guidance in responding to harmful online challenges or hoaxes was published by the Department for Education in February 2021.

Appendix B
Students in particular circumstances

Loreto College take a 'think family' approach to our safeguarding work with students and their families. People rarely live in complete isolation and therefore it is helpful to understand the needs of the wider family when we are working with a student and their parent/carer.

The 'think family' approach encourages services to talk more, work together better and make sure that all the people working with children, young people and adults in a family, plan and coordinate their work.

B. 1 Early Help

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:
College staff are 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 EHCP)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from college.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour' based abuse such as female genital mutilation or forced marriage.

B.2 Children who need 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. Local authorities should share the fact a child has a social worker. The designated safeguarding lead

and safeguarding team should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unexplainable and/or persistent absence from college 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).

Schools and colleges, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.

B.3 Pathways and Disabled students

Evidence suggests that some students with learning difficulties and disabilities are especially vulnerable to abuse, e.g., those with communication difficulties. Those working with adults with special educational needs and/or disabilities often provide close support, including intimate care, and may encounter indicators of possible abuse. Whilst extra care may be needed to ensure that the signs of abuse/neglect are interpreted correctly, any suspicions should be reported in exactly the same way as for any other learner.

The Pathways team support a number of students with disabilities and/or learning difficulties to develop confidence and independence through their day-to-day college activities. Students are at a transitional age and the team work with both adult and children's services to support the students and their families.

Any reports of abuse, neglect or exploitation involving students with SEND receive the close liaison between the designated safety lead (or a deputy) and the named person with oversight for SEND in the college – Debbie Hadfield.

- A young person could be considered to have disabilities if they have significant problems with communication, comprehension, vision, hearing or physical functioning.

- The Equality Act 2010 defines a person with a disability as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition of disability encompasses a broader range of impairments than might be commonly assumed, including children on the autistic spectrum, those with Tourette's syndrome and those with communication difficulties.

- Many factors can make a young person with disabilities more vulnerable to abuse than a non-disabled child of the same age. Safeguarding students with disabilities demands a greater awareness of their vulnerability, individuality and particular needs.

- Any young person with a disability is by definition a 'child in need' under Section 17 of the Children Act 1989. Children with complex health issues e.g., short gut syndrome are disabled and should also be considered a 'child in need' (Children Act 1989).

- The Disability Discrimination Act 1995 makes it unlawful to discriminate against a disabled person in relation to the provision of services. This includes making a service more difficult for a disabled person to access or providing them with a different standard of service.

The College recognises the increased vulnerability, in safeguarding terms, of Pathways and disabled students. These students may not be able to fully express the abuse that they have suffered/be suffering or be placed in more vulnerable situations on a more regular basis than mainstream students.

Staff are aware of the need to be extra vigilant when working with such students in order to provide robust safeguarding practices for them. Staff are also aware that in some cases students on the Pathways course do not always have the capacity to take safe decisions for themselves and so may require additional support/ guidance/ intervention from staff.

If staff have safeguarding concerns surrounding a student's capacity to make safe choices, they should follow the college procedures.

B.4 Looked after and previously looked after children

A child who is looked after by a local authority (referred to as a looked-after-child) as defined in section. 22 Children Act 1989, means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Ian Maddix is the Designated Teacher for Looked After Children.

Care leavers

Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Designated safeguarding leads should therefore have details of the local authority Personal

Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

B.5 Children who are lesbian, gay, bisexual or gender questioning

This section is currently subject to review and further guidance awaited pending the outcome of the gender questioning children guidance consultation (DfE, 2023b)

A student being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, students who are can be targeted by other students. In some cases, a student who is perceived by other students to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as students who identify are.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. All students are encouraged to report any concerns to the college safeguarding team.

B.6 Private Fostering

A private fostering arrangement is essentially one that is made privately (that is to say without being instigated by a local authority) for the care of a child under 16 years old (or 18 if he/she has a disability) by someone other than a parent or close relative with the intention that it should last more than 28 days. A private foster carer maybe a friend of the family or the child's friend's parents or someone unknown who is willing to privately foster a child. A private foster carer is not a parent, step parent, legal guardian, grandparent, brother, sister, aunt or uncle.

Private foster carers are legally required to notify their council, but many do not, often because they do not know that they have to. This means that Children's Social Care is unable to check whether the child is being properly cared for.

It is vital that Children's Social Care is aware of such arrangements so that they can safeguard and promote the welfare of potentially vulnerable children. Ideally, notification should come from the

parent and carer but professionals can also play an important role, as they are often the people who have the first contact, in explaining to private foster carers and parents that they have a duty to notify the local authority.

B.7 Think Whole Family

The Think Whole Family approach refers to the steps taken by children's, young people's and adult's practitioners in Manchester to identify wider family needs which extend beyond the individual they are supporting

In relation to safeguarding, those who work primarily with adults, should still consider the safeguarding needs of children, and those who work mostly with children, should still consider the needs of adults who may be at risk. Safeguarding is everyone's responsibility!

Appendix C
Safeguarding Adults

Safeguarding Adults at Risk of Harm

In addition to the general safeguarding procedures, Loreto College recognises that it has an important role to play in helping to promote and safeguard the welfare of adults at risk and to help protect them from abuse.

Vulnerability and risk of being abused or harmed may change with time and according to circumstance. All human beings are subject to change and chance happenings which may affect their capacity to manage themselves and their situation. While some people may appear to be strong, we know that no-one is invulnerable and at different times in our lives and in different circumstances, strengths can change and grow, diminish or disappear. Some people, because of their physical or social circumstances, have higher levels of vulnerability than others.

Adults with disabilities

Identifying abuse of adults with disabilities who may also present with a range of behaviours that challenge is not straightforward. It is crucial to effective safeguarding that all staff are able to recognise signs and indicators of abuse and this requires acceptance that adults with disabilities are more likely to be abused than adults without disabilities.

Definition of adult at risk

An adult is someone over 18. The Universal Declaration of Human Rights (1948), the European Convention on Human Rights, the Human Rights Act 1998 and the UN Convention on the Rights of Persons with Disabilities (2008) all state that adults should be free from abuse.

The term 'adult at risk' is used in this policy to replace 'vulnerable adult'. This is because the term 'vulnerable adult' may wrongly imply that some of the fault for the abuse lies with the victim of abuse and 'adult at risk' is the term that is used throughout current government guidance.

It follows that some adults, because of circumstance or particular vulnerability or risk, may be in need of protection. Mental capacity to consent must be considered when consideration actions to be taken in regard to an adult who may be at risk in line with Mental capacity Act (2005).

The Care Act 2014, stipulates that adult safeguarding duties apply to any adult who: -

- Has care and support needs
- Is experiencing, or is at risk of abuse or neglect and
- Is unable to protect themselves because of their care and support needs.

Definitions of abuse – adults at risk

Physical Abuse

This is the infliction of pain or physical injury, which is either caused deliberately, or through lack of care.

Sexual Abuse

This is the involvement in sexual activities to which the person has not consented or does not truly comprehend and so cannot give informed consent, or where the other party is in a position of trust, power or authority and uses this to override or overcome lack of consent.

Psychological or Emotional Abuse

These are acts or behaviour, which cause mental distress or anguish or negates the wishes of the adult at risk. It is also behaviour that has a harmful effect on their emotional health and development or any other form of mental cruelty.

Financial or Material Abuse

This is the inappropriate use, misappropriation, embezzlement or theft of money, property or possessions. Adults at risk can be prey to people taking advantage of them by taking gifts of money, food and other items from them, when the adult has little idea of their true value, does not realise this will leave them with insufficient means or believes that the people they are helping are their friends. Such abuse may also involve the use of a position of authority or friendship to persuade a person to make gifts, to leave legacies or change a will.

Neglect or Act of Omission

This is the repeated deprivation of assistance that the adult at risk needs for important activities of daily living, including the failure to intervene in behaviour which is dangerous to the adult at risk or to others. Someone may be suffering from neglect when their general well-being or development is impaired and where access to necessary health or medication is denied.

Discriminatory Abuse

This is the inappropriate treatment of an adult at risk because of their age, gender, race, religion, cultural background, sexuality, disability etc. Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. Discriminatory abuse links to all other forms of abuse.

Hate crime
This is an act of violence or hostility directed at people because of who they are, or someone thinks they are. For example, a person is disabled or thought to be gay/lesbian or transgender.

Signs of possible abuse in adults at risk

Physical

- A history of unexplained falls, fractures, bruises, burns, minor injuries;
- Signs of under or over use of medication and/or medical problems unattended.

Sexual

- Pregnancy in a woman who is unable to consent to sexual intercourse;
- Unexplained change in behaviour or sexually implicit/explicit behaviour;
- Torn, stained or bloody underwear and/or unusual difficulty in walking or sitting;
- Infections or sexually transmitted disease's
- Full or partial disclosure or hints of sexual abuse;
- Self-harming.

Psychological

- Alteration in psychological state e.g., withdrawn, agitated, anxious, tearful;
- Intimidated or subdued in the presence of the carer;
- Fearful, flinching or frightened of making choices or expressing wishes;
- Unexplained paranoia.

Financial or Material

- Disparity between assets and living conditions;
- Unexplained withdrawals from accounts or disappearance of financial documents;
- Sudden inability to pay bills;
- Carers or professionals fail to account for expenses incurred on a person's behalf;
- Recent changes of deeds or title to property.

Neglect or Omission

- Malnutrition, weight loss and /or persistent hunger;
- Poor physical condition, poor hygiene,
- Failure to access appropriate health, educational services or social care;
- No callers or visitors.

Discriminatory

- Inappropriate remarks, comments or lack of respect;
- Poor quality or avoidance of care.

Institutional

- Lack of flexibility or choice over meals, bedtimes, visitors, phone calls etc.;
- Inadequate medical care and misuse of medication;
- Inappropriate use of restraint;
- Sensory deprivation e.g., denial of use of spectacles or hearing aids;
- Missing documents and/or absence of individual care plans;
- Public discussion of private matter;
- Lack of opportunity for social, educational or recreational activity.

Other indications that abuse may be occurring:

- The person may not be allowed to speak for themselves, or see others, without the caregiver (suspected abuser) being present;
- Attitudes of indifference or anger towards the adult at risk;
- Family member or caregiver blames the adult at risk (e.g., accusation that incontinence is a deliberate act);
- Aggressive behaviour (threats, insults, harassment) by the caregiver towards the person they are caring for;
- Previous history of abuse of others on the part of the caregiver;
- Inappropriate display of affection by the caregiver;
- Flirtations, coyness, etc., which might be possible indicators of an inappropriate sexual relationship;
- Social isolation of the family or restriction of activity for the person they are caring for by the caregiver;
- Conflicting accounts of incidents by the family, supporters or the adult at risk;
- Inappropriate or unwarranted defensiveness by the caregiver;
- Obvious absence of assistance or attendance.
- Appearance, unshaven, clothes not washed, unkempt.

What to do if you suspect mistreatment of an adult at risk or they disclose that they have been abused/referral procedure

Some vulnerable people will find it difficult to disclose abuse and may need help to tell their story to someone they trust. Careful listening is most important, without 'leading' someone with suggestions or asking questions that request further information which may confuse the story. If someone discloses abuse, it is important to receive the information without making a judgement or making a comment that may lead the individual to believe his or her word is doubted.

Never promise that you can keep it a secret as in cases where the adult themselves, or another child or adult is at risk; this information will need to be shared.
The Care Act 2014 builds on previous government guidance and local authorities are now required to make enquiries or ensure that enquiries take place, if they reasonably suspect an adult who would meet the criteria of being at risk, has been abused or neglected or is at risk of being abused or neglected.

It is important that, prior to making a referral to Adult Social Care or the police, timely consideration has been given to the ability of the adult at risk to understand the concerns, and whether they have

an ability to give consent to concerns being raised with other agencies. It is likely that one of the first questions that the local authority is likely to ask is 'Does the adult at risk have capacity?' This refers to capacity as defined under the Mental Capacity Act 2005.

It is always essential in safeguarding to consider whether the adult at risk is capable of giving informed consent. If they are, their consent should be sought prior to making a referral. This may be in relation to whether they give consent to:

- An activity that may be abusive – if consent to abuse or neglect was given under duress, for example, as a result of exploitation, pressure, fear or intimidation, this apparent consent should be disregarded.
- A Safeguarding Adults investigation going ahead in response to a concern that has been raised.
- Where an adult at risk, with mental capacity, has made a decision that they do not want action to be taken and there are no public interest or vital interest considerations, their wishes must be respected. The college seeks permission from all students to share safeguarding information with parents, when staff feel it is in the best interests of the student, regardless of the age of the student.
- The person must be given information, have the opportunity to consider all the risks and fully understand the likely consequences of that decision over the short and long term.

If, after discussion with the adult at risk who has mental capacity, they refuse any intervention, their wishes will be respected *unless:*

1. There is a public interest, for example, not acting will put other adults or children at risk.
2. There is a duty of care to intervene, for example, a crime has been or may be committed.

In such circumstance in the above two points, an alert to the Adult Social Care Department must be made. When there are concerns that a crime has been committed, then the police should also be informed. An allegation of abuse or neglect of an adult at risk, who does not have capacity to consent on issues about their own safety, will always give rise to action under the Safeguarding Adults process.

Considerations for information sharing:

Vital interest

If the adult at risk has the mental capacity to make informed decisions about their safety and they do not want any action to be taken, this does not preclude the sharing of information under Safeguarding Adults procedures with relevant professional colleagues. This is to enable professionals to assess the risk of harm and to be confident that the adult at risk is not being unduly influenced or intimidated, and is aware of all the options. This will also enable professionals to check the safety and validity of decisions made. It is good practice to inform the adult at risk that this action is being taken unless doing so would increase the risk of harm.

Best interest

If an adult at risk lacks capacity to make informed decisions about maintaining their safety and they do not want any action to be taken, professionals have a duty to act in their best interests under the Mental Capacity Act 2005. This would automatically trigger a Safeguarding Adults referral.

Public interest

If the adult at risk has the mental capacity to make informed decisions about maintaining their safety and they do not want any action to be taken, practitioners have a duty to share the information with relevant professionals to prevent harm to others. This will automatically trigger a Safeguarding Adults referral. Contact details for Local Authority Multi-Agency safeguarding teams are displayed in staffrooms.

All concerns must be referred to the Designated Safeguarding Lead.

If a person is in immediate danger, dial 999 and ask for the police.

To report suspected abuse or neglect of an adult contact:

Manchester Contact Centre: Telephone: 0161 234 5001 Email: mscreply@manchester.gov.uk

Further information on Mental Capacity

The presumption in the Mental Capacity Act is that adults have mental capacity to make informed choices about their own safety and how they live their lives. Issues of mental capacity and the ability to give informed consent are central to decisions and actions in Safeguarding Adults. All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take.

This includes their ability:

- To understand the implications of their situation.
- To take action themselves to prevent abuse.
- To participate to the fullest extent possible in decision making about interventions.

The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves, and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the Safeguarding Adults process must comply with the Act. The Act says that: '... a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance, in the functioning of the mind or brain'.

Further, a person is not able to make a decision if they are unable to:

- understand the information relevant to the decision or
- retain that information long enough for them to make the decision or
- use or weigh that information as part of the process of making the decision or
- Communicate their decision (whether by talking, using sign language or by any other means as muscle movements, blinking an eye or squeezing a hand).

Mental capacity is time and decision specific. This means that a person may be able to make some decisions but not others at a particular point in time. For example, a person may have the capacity to consent to simple medical examination but not to major surgery. Their ability to make a decision may also fluctuate over time.

Principles of the Mental Capacity Act 2005

Any person from the age of 16 (the age at which the Mental Capacity Act applies) at risk has the right to make their own decisions and must be assumed to have capacity to make decisions about their own safety unless it is proved (on a balance of probabilities) otherwise

- Adults at risk must receive all appropriate help and support to make decisions before anyone concludes that they cannot make their own decisions

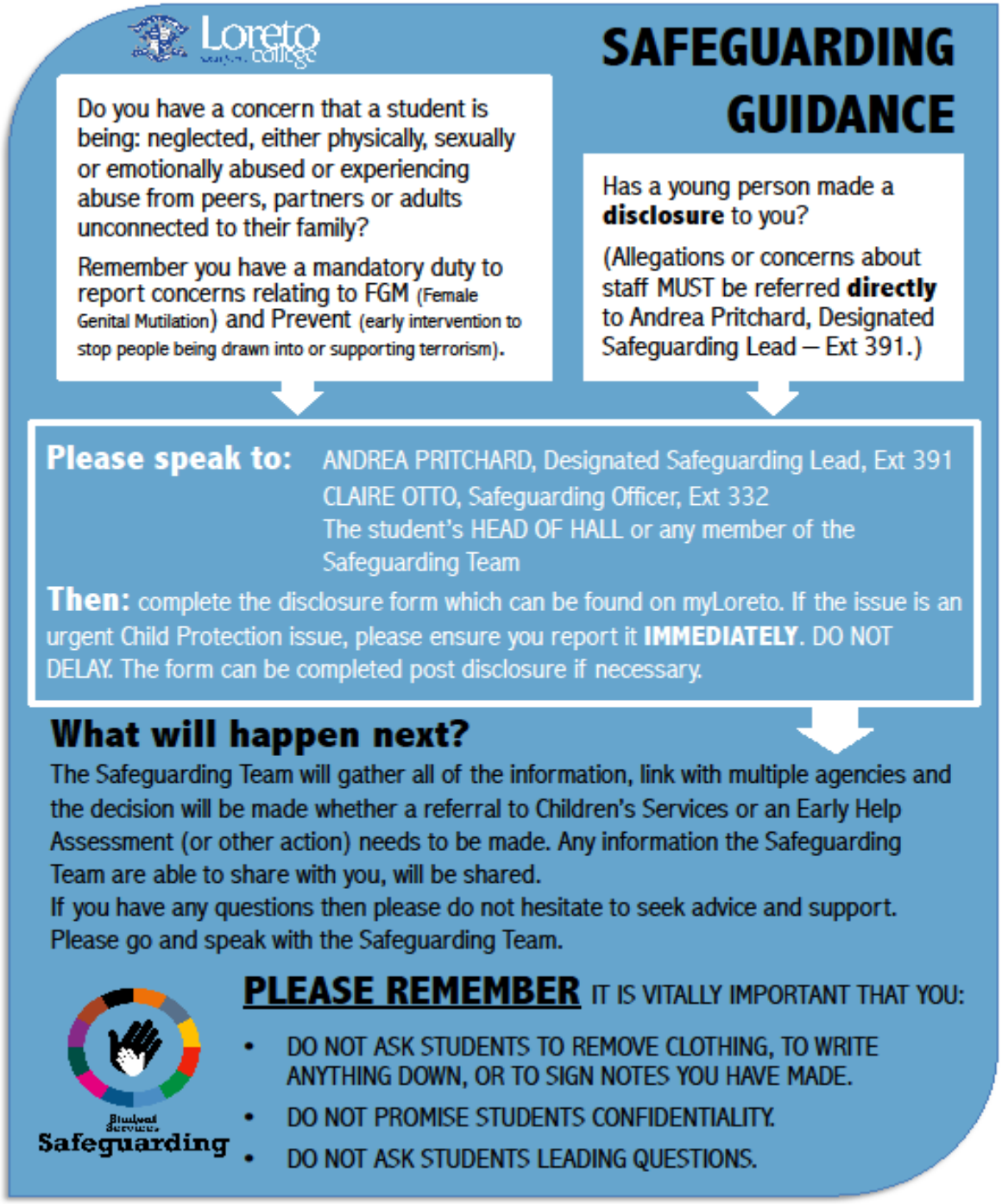
- Adults at risk have the right to make decisions that others might regard as being unwise or eccentric and a person cannot be treated as lacking capacity for these reasons.

Decisions made on behalf of a person who lacks mental capacity must be done in their 'Best Interests' and on the basis of a 'Reasonable Belief' and should be the least restrictive of their basic rights and freedoms.

Ill treatment and willful neglect

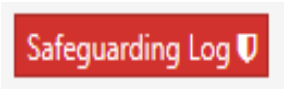
An allegation of abuse or neglect of an adult at risk who does not have capacity to consent on issues about their own safety will always give rise to action under the Safeguarding Adults process and subsequent decisions made in their best interests in line with the Mental Capacity Act and Mental Capacity Act Code as outlined above. Section 44 of the Act makes it a specific criminal offence to willfully ill-treat or neglect a person who lacks capacity.

Appendix D.1: Safeguarding Guidance Poster

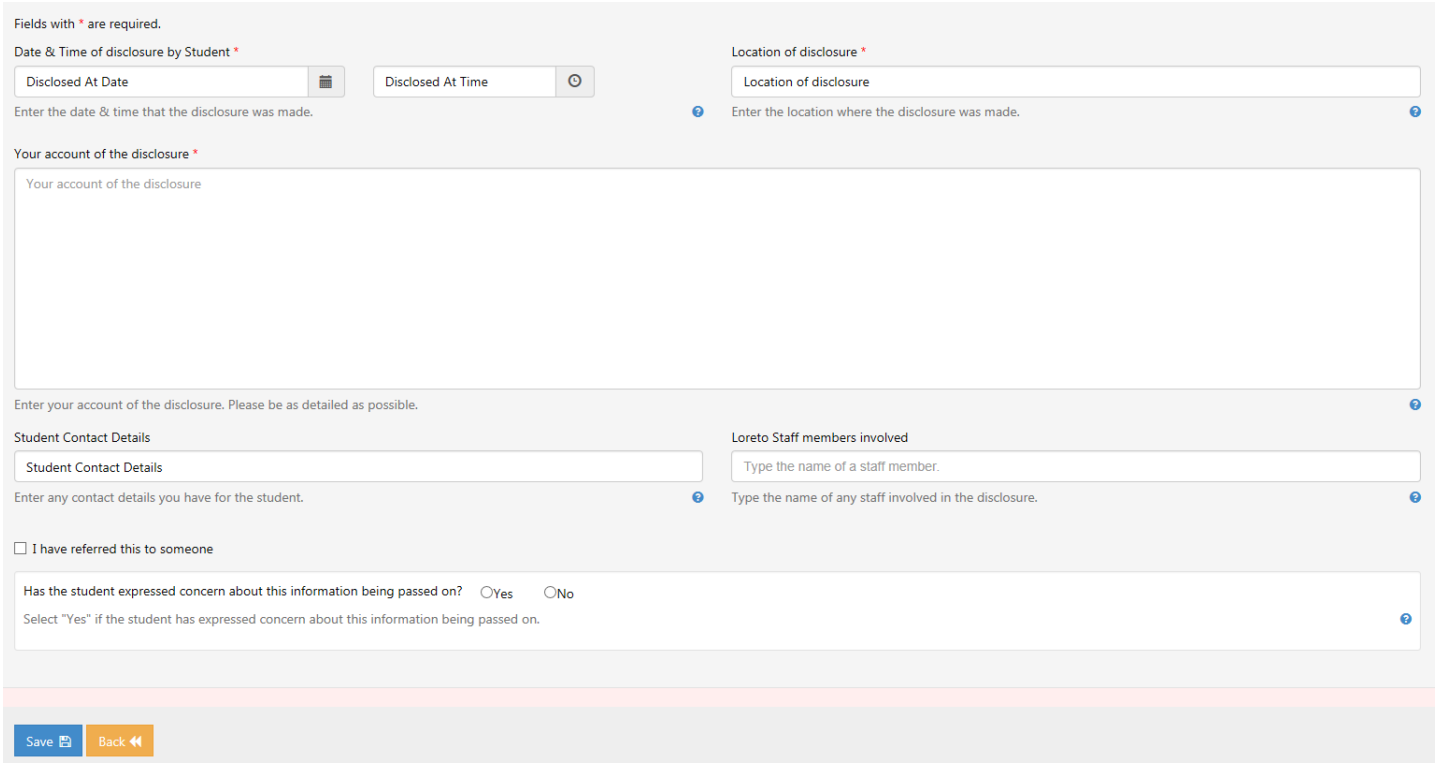


Appendix D.2 : Recording Disclosures

Process for Staff to record Safeguarding Disclosures regarding Students

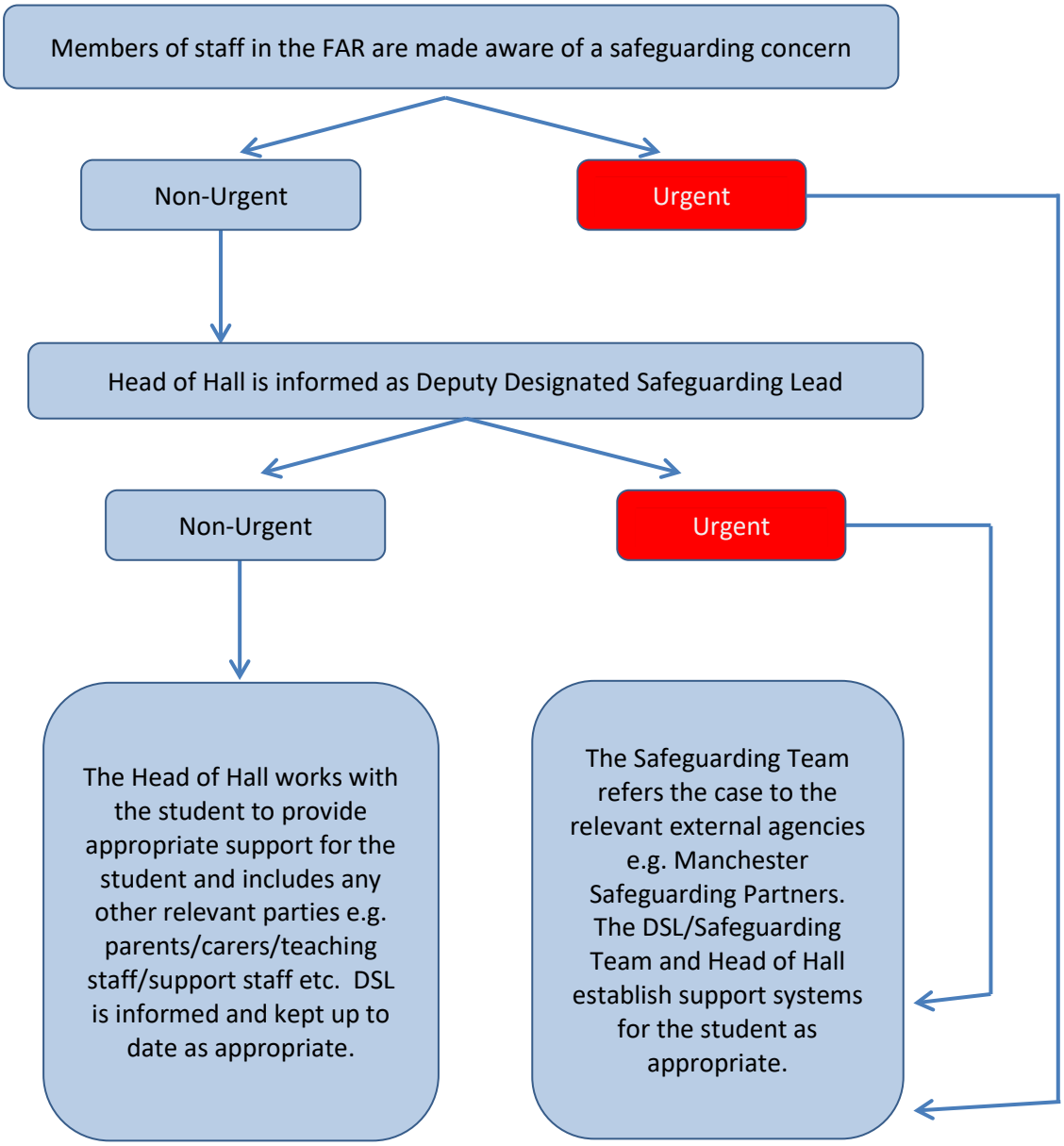


Staff should use the Safeguarding Log button found on the student's myLoreto page to record disclosures after reporting the concern to the DSL or safeguarding team.

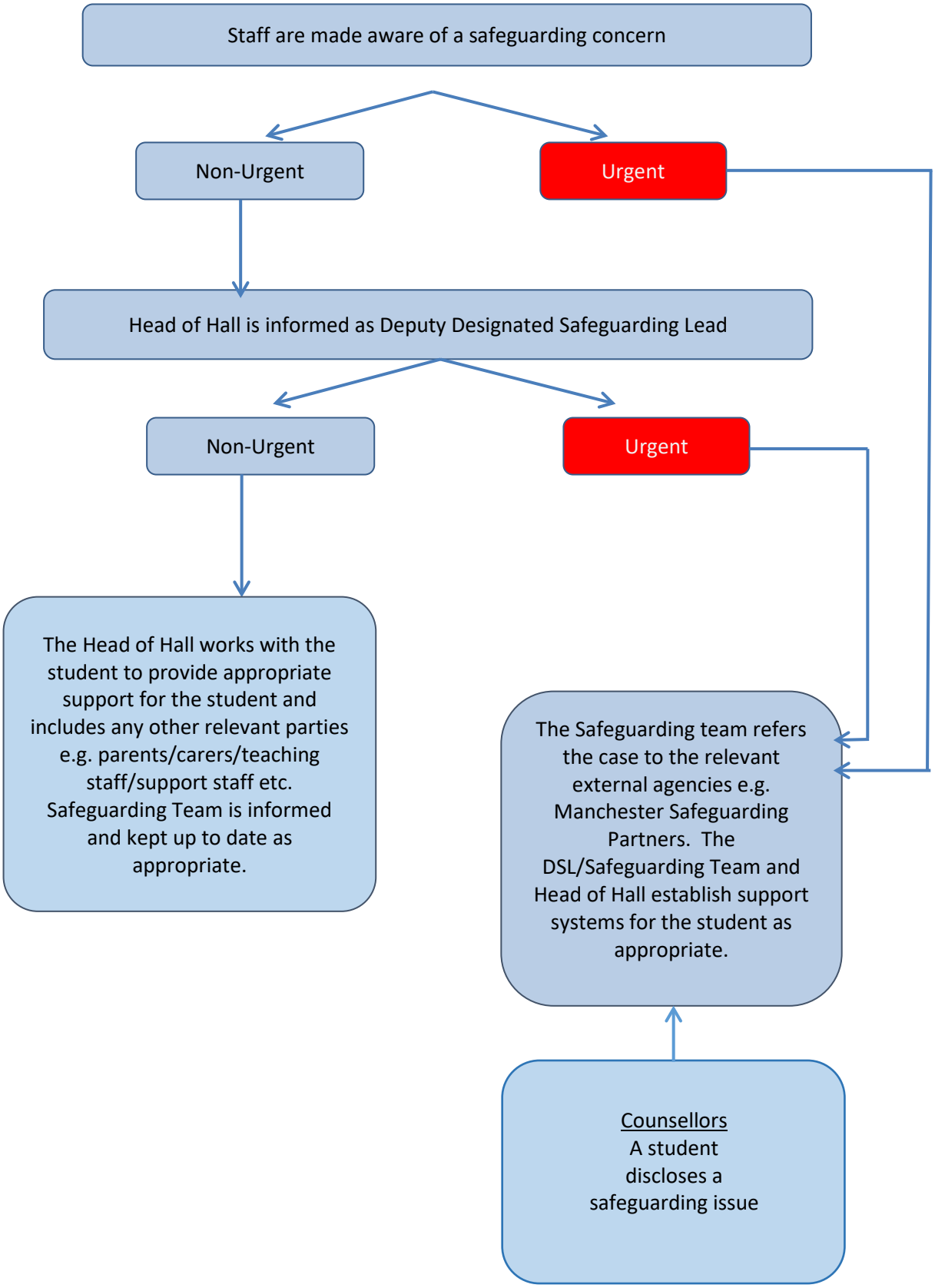


Appendix E: College Safeguarding Referral Structures

Safeguarding Referral Structures: First Aid Room



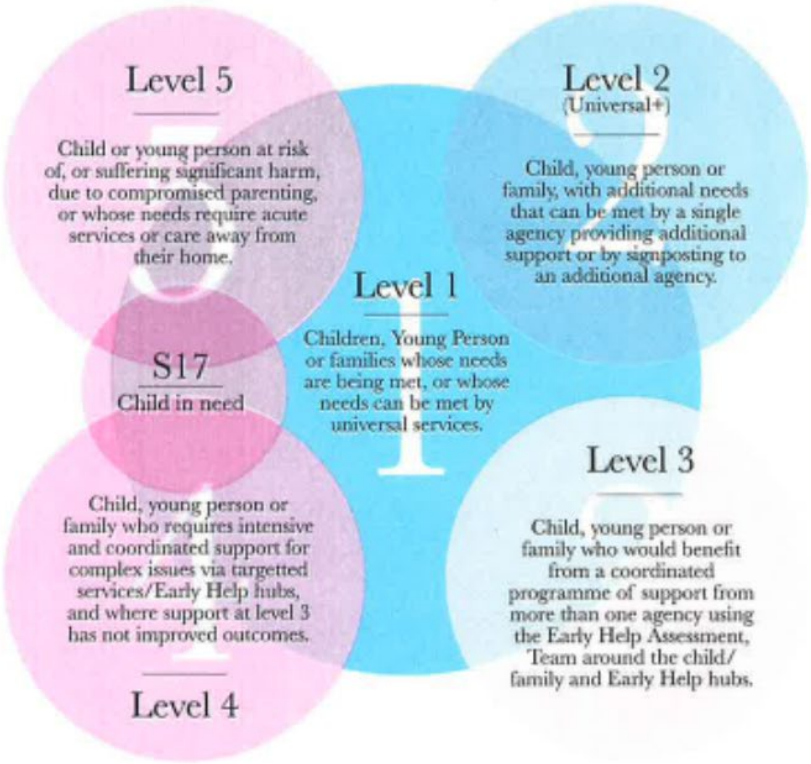
If staff are unsure as the whether a concern is urgent or non-urgent, always treat the concern as urgent. In an emergency, staff should call 999.



If staff are unsure as to whether a concern is urgent or non-urgent, always treat the concern as urgent. In an emergency, staff should call 999.

Appendix F: Levels of Need

THE FIVE LEVELS OF NEED



1.6 The five levels have been set out to reflect that children often move in a non-structured way between levels. The removal of the previous definitive tiered 'thresholds' (which were often directly linked to specific service delivery thresholds) will support the aspiration to formulate bespoke sequenced interventions that are able to quickly flex if individuals move up and down the continuum. It also supports the awareness that, whatever level the child's needs, they continue to be supported at a Universal level throughout.

Appendix G: Use of Reasonable Force

See Student Behaviour Policy for further information.

All members of Loreto staff have a legal power to use reasonable force. Reasonable force means using no more force than is needed. Use of force in any circumstances should be as a very last resort. Loreto College do not require parental consent to do so.

In any unlikely event, reasonable force can be used to prevent students from hurting themselves or others, from damaging property or from causing disorder:

- Remove a disruptive student from the classroom where they have refused to follow an instruction to do so;
- Prevent a student behaving in a way that disrupts a college event, trip or visit;
- Prevent a student leaving the classroom where allowing the student to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- Prevent a student from attacking a member of staff or another student, or to stop a fight; and
- Restrain a student at risk of harming themselves through physical outbursts.

Appendix H: Risk and Needs Assessment: Sexual Violence/Harassment

Risk and Needs Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment using this template.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case by case basis.

Loreto College have adopted the use of The AIM Project Adolescent Checklist. This allows Loreto College to actively consider any risks that may be posed to all students (and put measures in place to keep them safe) as well as consider the potential harm to themselves from any student displaying harmful sexual behaviours. It is not intended to replace the detailed assessments of expert professionals.

The completed assessment can be included as part of a referral to children's social care and should be electronically recorded on the Safeguarding Log and kept under review.

IDENTIFIED VICTIM	
Name of student	
DOB :	**Age:**
Address	
Previous school attended	
Tutor group	
Current Courses	

ALLEGED PERPETRATOR	
Name of student	
DOB :	**Age:**
Address	
Current Loreto Student	Y / N
Previous school attended	
Tutor group	
Current Courses	

Date of Incident:	
Location of Incident:	
Names of others present:	
Police Log number:	

For each of the 8 questions choose which of the examples the behaviour being evaluating is most similar too. Indicate this by putting a X on the continuum.

The AIM Project

Sexual Behaviour Continuum of Potential Harm to Self and/or Others

Normal	Inappropriate	Problematic	Abusive/Violent
1. Type of sexual behaviour			
Explicit sexual discussions, use of sexual swear words, sexual jokes Flirtatious behaviour, kisses/cuddles Interest in online activity – seeking sexual imagery Self-masturbation **Legally over 16 years old - mutually consenting masturbation/ sexual intercourse/ oral sex etc. ** This is the legal limit but it is important to consider the young person's sexual activity in the context of their age and ability level, particularly the ability to understand their sexual behaviours and the consequences, physically, emotionally & socially	Engaging in sexual conversations on line with strangers Single instances of inappropriate sexual behaviour Socially acceptable behaviour within their peer group, even if adults would not approve or they are technically illegal, e.g. sharing naked or semi-naked or sexually provocative pictures of self with a 'boyfriend/girlfriend'	Sexual behaviours that are developmentally unusual and not socially acceptable within their peer group, e.g sharing sexual pictures of elderly people Single occurrences of sexual behaviours such as exposure, peeping, frottage or obscene telephone calls Sexual preoccupation and anxiety Pressurising others to send intimate/ embarrassing pictures Sharing intimate/ embarrassing pictures of others to embarrass them but not threaten or coerce them. Seeking peer aged indecent images	**Abusive** Sexual behaviours involving a misuse of power and with an intent to harm Use of coercion and/or force to ensure victim compliance Intrusive sexual behaviours including penetration or attempted penetration anal, vaginal or oral, by penile, digital, or object Chronic use of pornography and distorted concepts of what is real Use of hard-core pornography involving younger children Self-reported sexual interest in children, or abuse of younger children Unusual sexual activities such as fetishes / sexual activity with animals etc.

Normal	Inappropriate	Problematic	Abusive/Violent
1. Type of sexual behaviour			
Some adults may not wish them to be sexual until they are 18 years old, but sexual development is an important part of the young person's overall development			Abuse of strangers Persistent obscene telephone calls, voyeurism, exhibitionism off or online, frottage Coercion of others to share intimate/ embarrassing pictures Making sexually explicit threats, or blackmail through social media Involvement in sexual exploitation, including procuring for others **Violent** Physical, violent sexual abuse Violence which is physiologically and/or sexually arousing to the young person; sadism Use of hard-core porn with violent/ aggressive themes Sexual assault and rape

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Normal	Inappropriate	Problematic	Abusive/Violent
2. Context of behaviour			
Developmentally expected Socially acceptable Consensual, mutual, reciprocal, both parties are free to engage or disengage Shared decision making	Context for the behaviour may be inappropriate eg. location Generally consensual and reciprocal even if adults would not approve	No overt elements of victimization Consent issues may be unclear or not taken seriously enough May lack reciprocity or equal power May include levels of compulsivity Behaviour appears influenced by peers. Touching behaviours (non-penetrative) Isolated incident	Behaviour, planned, manipulative, secretive, there are elements of violence, threat, force, coercion (to ensure victim compliance) Includes misuse of power Informed consent lacking or not able to be freely given by victim Sexual preoccupation which interferes with daily function Young person has one or more previous convictions/ final warning/ reprimands for sexual behaviour The behaviour is a way for them to cope with negative emotions
3. Young Person's response when challenged about their behaviour			
Happy, comfortable, May be embarrassed if spoken to by adults about their sexual behaviour	Embarrassed if spoken to by adults about their sexual behaviour Challenging of the adults, saying this is what their age group do Accepting of the adult's perspective and changes behaviour	Embarrassed, ashamed, anxious. Self-harm Didn't understand the possible impact (particularly re activity on social media) Can demonstrate some remorse and empathy, even if this is initially limited	Anger, aggression, defensive Shows little emotion on being challenged. Denial of responsibility/ minimization of harm/ blames the victim Lack of empathy Self-harm, other risky behaviours Continued the behavior despite knowing the consequences

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Normal	Inappropriate	Problematic	Abusive/Violent
4. Impact on the recipients of the sexual behaviour which may include adults			
The other young person may be happy, comfortable or may be embarrassed if found by adults	The other young person may be embarrassed if spoken to about it by adults.	If the recipient of the sexual behaviour is a child or young person with learning disabilities the power difference may make them vulnerable The other young person is uncomfortable or irritated, but not fearful or anxious. They feel able to tell someone If the recipients of the sexual behaviour are adults they may feel physically uncomfortable or disempowered	The recipient of the sexual behaviour may feel uncomfortable, fearful, anxious, suicidal if the abuse has been through social media The recipient of the sexual behaviour may be trying to avoid the young person e.g. stopping attending school, or going out socially Adults may feel disempowered, intimidated and unable to control the behaviour or protect themselves or others
5. Power Dynamics			
Both parties are peer aged and with equal ability levels. There are no factors to suggest a power imbalance	Peer aged or same ability level but the behaviours are clearly led by the young person. Relationships where there is an age and development gap with the victim being younger or with learning disabilities, which may create a power imbalance.	Factors suggest one young person has some control over the other, but they still feel able to tell May be a naïve attempt at developing a relationship Online and on social media the young people involved may not know each other at all, but join in group behaviours	There are clear power differences in the relationship which may be based on age, gender, learning disabilities or social status The young person has very poor social/ communication or intimacy skills Victims on and offline are selected for their vulnerability, and are intimidated or sexually exploited

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Normal	Inappropriate	Problematic	Abusive/Violent
6. Persistence/ frequency of the behaviour			
Healthy interest in sexual behaviour but not the sole focus of interest in the young person's life	Healthy interest in sexual behaviour but not the sole focus of interest in the young person's life Young person may have tested a few boundaries but is generally rule abiding	Interest in sexual behaviour is slightly out of balance with other aspects of the young person's life, but it is not all consuming Behaviours are intermittent and the young person can control behaviours	Young person is obsessed or preoccupied with sexual thoughts/ pornography, which may be sadistic and aggressive. Incidents are frequent or increasing in frequency The focus on sex is out of balance with other aspects of their life The behaviour has been happening over a period of time and/or has been repeated against the same victim Young person continues to seek access to the victim on or offline/ or accesses technology despite parental/ external controls
7. Other Behavioural problems			
No other behavioural problems, healthy peer relationships	No other evident behavioural problems but if present would be minimal and manageable through normal processes in school	Poor sexual boundaries Problems coping with difficult emotions or in making connections and relationships. Difficulties in making the best use of education even if academically able They may already have been subject to some interventions through school but not to the extent of exclusion	Diagnosis of depression or other significant mental health problems. Formal diagnosis of Conduct disorder/ADHD Highly impulsive/ compulsive behaviour History of aggressive behaviour Other offending behaviours for which they received significant sanctions, eg fire setting History of cruelty to animals, including torture and killing School exclusions Problems with drugs or alcohol

Normal	Inappropriate	Problematic	Abusive/Violent
8. Background Information/ Family response			
No significant family history Parents have a positive view of young person's developing sexuality Positive attachments with parents and carers At least one positive friendship Young person has access to social and leisure pursuits and to appropriate sex education	No significant concerning family history Parents respond appropriately and proportionately to behaviours, e.g. by setting boundaries and providing information about why the behaviour is not appropriate	There may be some previous low-level concerns about the family functioning. Family initially struggle to accept that their child has a problem Family have problems or cultural objections to discussing sexual behaviours Boundaries within the family on privacy, intimacy, sexual information and activity or they are not clear or not enforced.	Pattern of discontinuity of care/ poor attachments within the family High levels of trauma eg physical, emotional, sexual abuse, neglect, witnessing domestic violence Family members have anti-social history including offences against children Family are minimizing the behaviour or are rejecting of the young person, harsh or punitive There are poor or no boundaries re privacy, intimacy, sexual information and activity or they are not clear or not enforced

The 8 outcomes should be collated together below to determine the overall outcome. Anything falling into the normal part of the continuum does not require any further work. Guidance on behaviours falling into the other parts of the continuum can be found below.

The AIM Project

Sexual Behaviour Continuum of Potential Harm to Self and/or Others

Outcome – Mark on the continuum the *overall* outcome for this young person, determined using the table below.

	Normal	Inappropriate	Problematic	Abusive/Violent
1 Type of sexual behaviour				
2 Context of sexual behaviour				
3 Response when challenged				
4 Impact on recipient				
5 Power Dynamics				
6 Persistence/frequency				
7 Other behavioural problems				
8 Background information				

Guidance on Checklist outcomes and levels of intervention required

Inappropriate		Problematic		Abusive / Violent	
Behaviours	**Outcomes & Responses**	**Behaviours**	**Outcomes & Responses**	**Behaviours**	**Outcomes & Responses**
These behaviours are the least worrying. The child/young person requires a low-key intervention Parents/carers are usually positive and supportive of the child/ young person	Home/School liaison. Education and setting appropriate boundaries and expectations Life skills work, self-esteem etc.	These behaviours are of concern but may have moderating features of the child/young person taking responsibility for their behaviours and being prepared to engage in work. The behaviours may be indications of the child/ young person's own abuse Parents/ carers may be struggling or ambivalent about the sexual behaviours	Possible referral discussed with Children's Services Pattern mapping with partner agencies to develop a more in depth understanding of the sexual behaviour and whether or not a full AIM Assessment is required. Schools can develop a RAMP Safety and Support Plan Levels of supervision or monitoring Setting appropriate boundaries and expectations Individual work on understanding and controlling their behaviour Life skills work, self-esteem etc.	Referral to Children's Services and the Police An AIM assessment of the sexual behaviours and child/young person family background required	Supervision and restrictions initially until fuller assessment is completed. This must be kept under review. Schools can develop a RAMP Safety and Support Plan Creating a safe environment and building self esteem, life and social skills etc. Individual work on understanding and controlling their sexual behaviour

The needs of young people who sexually harm should be considered separately from the needs of their victims. Guidance should also be sought from the Greater Manchester Safeguarding Children Board procedures including the Pathway for Response to Harmful Sexual Behaviour.
Where there has been a report of sexual violence, it is likely that a professional risk assessment by social workers and or sexual violence specialists will be required. These professional assessments will be used to inform the approach of Loreto College in supporting and protecting students and updating any previous risk and needs assessments.

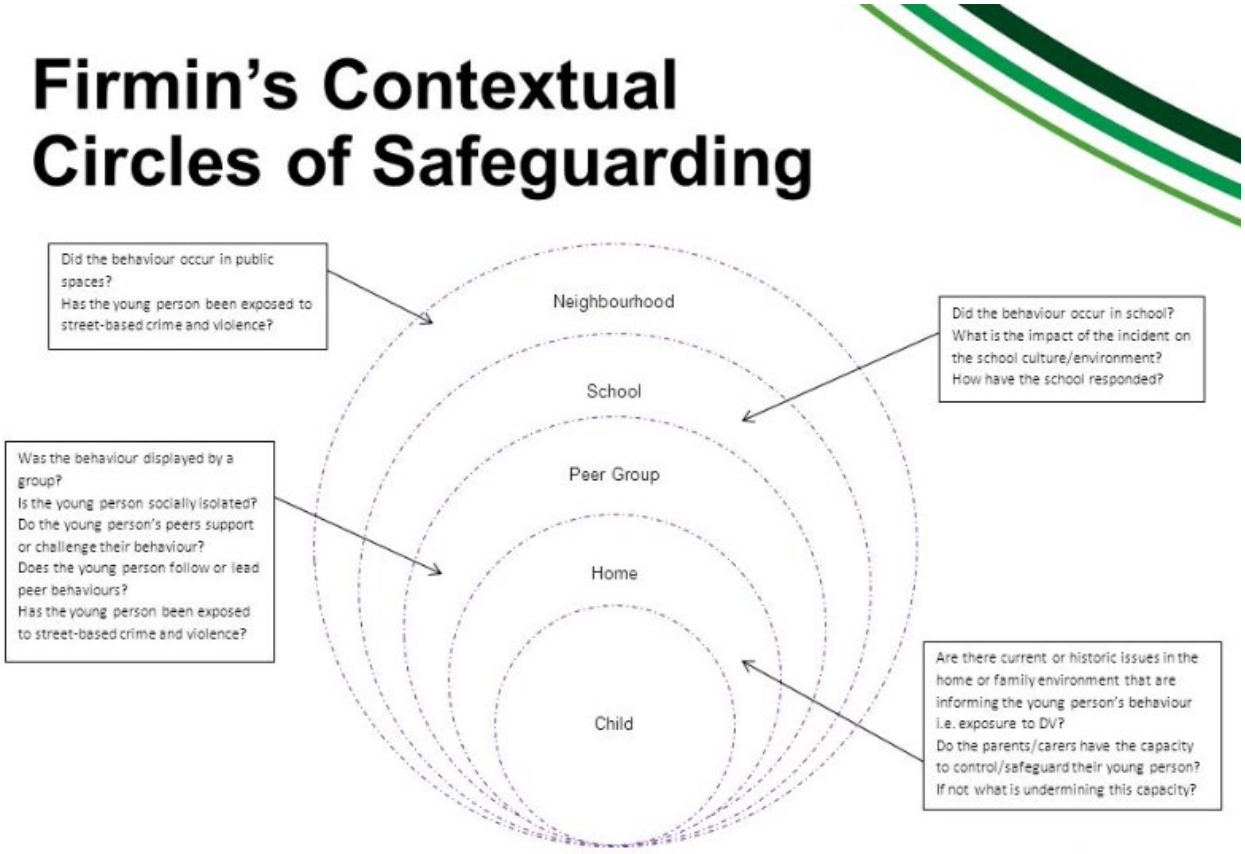
For guidance regarding young people with Autism please see 'Understanding and Managing Sexual Behaviours in Education Settings'

Intervention plan

Intervention plan

DEFINITIONS	
Peer on Peer Abuse – Child Sexual Exploitation	Captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contacts and situations by another young person.
Peer On Peer Abuse – domestic abuse	Relates to young people aged 16-17 who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships.
Peer on Peer Abuse – Harmful Sexual Behaviours	The definition for young people who *display* harmful sexual behaviour refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours)
Peer on Peer Abuse – Serious Youth Violence	Makes reference to offences (as opposed to relationships or contacts) and captures the most serious in nature including murder, rapes and GBH between young people under 18.
Peer On Peer Abuse – Sexual harassment	'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include: • sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; • sexual "jokes" or taunting; • physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and Online sexual harassment: This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: • non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges); • sexualised online bullying; • unwanted sexual comments and messages, including, on social media; and • sexual exploitation; coercion and threats.
Peer On Peer Abuse – Sexual Violence	sexual offences under the Sexual Offences Act 2003 as described below: <u>Rape:</u> A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. <u>Assault by Penetration:</u> A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. <u>Sexual Assault:</u> A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Firmin's Contextual Circles of Safeguarding



Appendix I: Transfer and receipt of Safeguarding Files

Safeguarding File Receipt

NAME OF STUDENT	
DATE OF BIRTH	
NAME OF COLLEGE RECEIVING CP FILE	c/o Mrs A Pritchard Designated Safeguarding Lead Loreto Sixth Form College
ADDRESS OF RECEIVING COLLEGE	Chichester Road South Manchester M15 5PB
NAME OF DESIGNATED SAFEGUARDING LEAD AT RECEIVING COLLEGE	Mrs Andrea Pritchard
DATE FILE RECEIVED	
METHOD OF DELIVERY	
HAS THE FILE BEEN TAMPERED WITH IN TRANSIT?	Yes/No (please delete as appropriate)
SIGNATURE	

- Loreto College will ensure that the Safeguarding file is passed to the Designated Safeguarding Lead.
- The Safeguarding file will be stored securely and information shared on a 'need to know' basis.
- Loreto Sixth form College will contact sending establishment if the file has been tampered with in any way.

Safeguarding File Transfer

Part 1 completed by Loreto College:

NAME OF STUDENT	
DATE OF BIRTH	
NAME OF COLLEGE SENDING CP FILE	c/o Mrs A Pritchard Designated Safeguarding Lead Loreto Sixth Form College
ADDRESS OF SENDING COLLEGE	Chichester Road South Manchester M15 5PB
REASON FOR MOVE	
DATE FILE SENT	
NAME OF DESIGNATED SAFEGUARDING LEAD	Mrs Andrea Pritchard
METHOD OF DELIVERY	
SIGNATURE	

Part 2 to be completed by receiving establishment:

NAME OF ESTABLISHMENT RECEIVNG SAFEGUARDING FILE	
ADDRESS OF ESTABLISHMENT	
DATE RECEIVED	
NAME OF DESIGNATED SAFEGUARDING LEAD	
HAS THE FILE BEEN TAMPERED WITH IN TRANSIT?	Yes/No (please delete as appropriate)
SIGNATURE	

- Please ensure that the Safeguarding file is passed to the Designated Safeguarding Lead at the receiving establishment using a secure method of deliver with Part 1 of this form completed.
- Receiving establishment please complete and return this form to the Designated Safeguarding Lead listed in part 1 above. You are advised to keep a copy for your own reference.
- The Safeguarding file should be stored in accordance with this guidance to schools on record keeping
- Receiving establishment to contact Loreto Sixth form College if the file has been tampered with.

Appendix J: Escalation Process

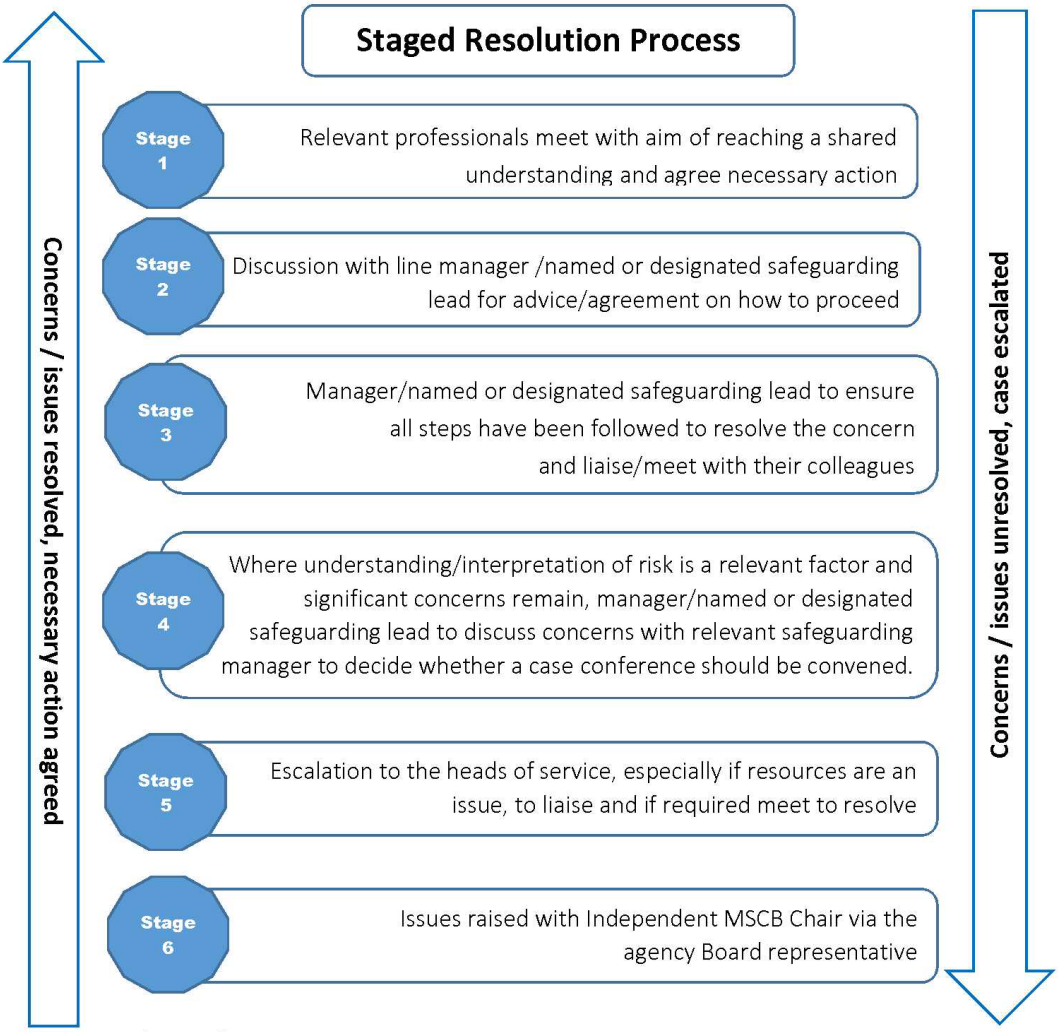
MSCB
MANCHESTER SAFEGUARDING CHILDREN BOARD

ESCALATION POLICY AND PROCESS

Principle of resolving difference of professional opinion

It is every professional's responsibility to 'problem solve'. Communication is extremely important and is the key to resolving professional misunderstandings or disagreements.

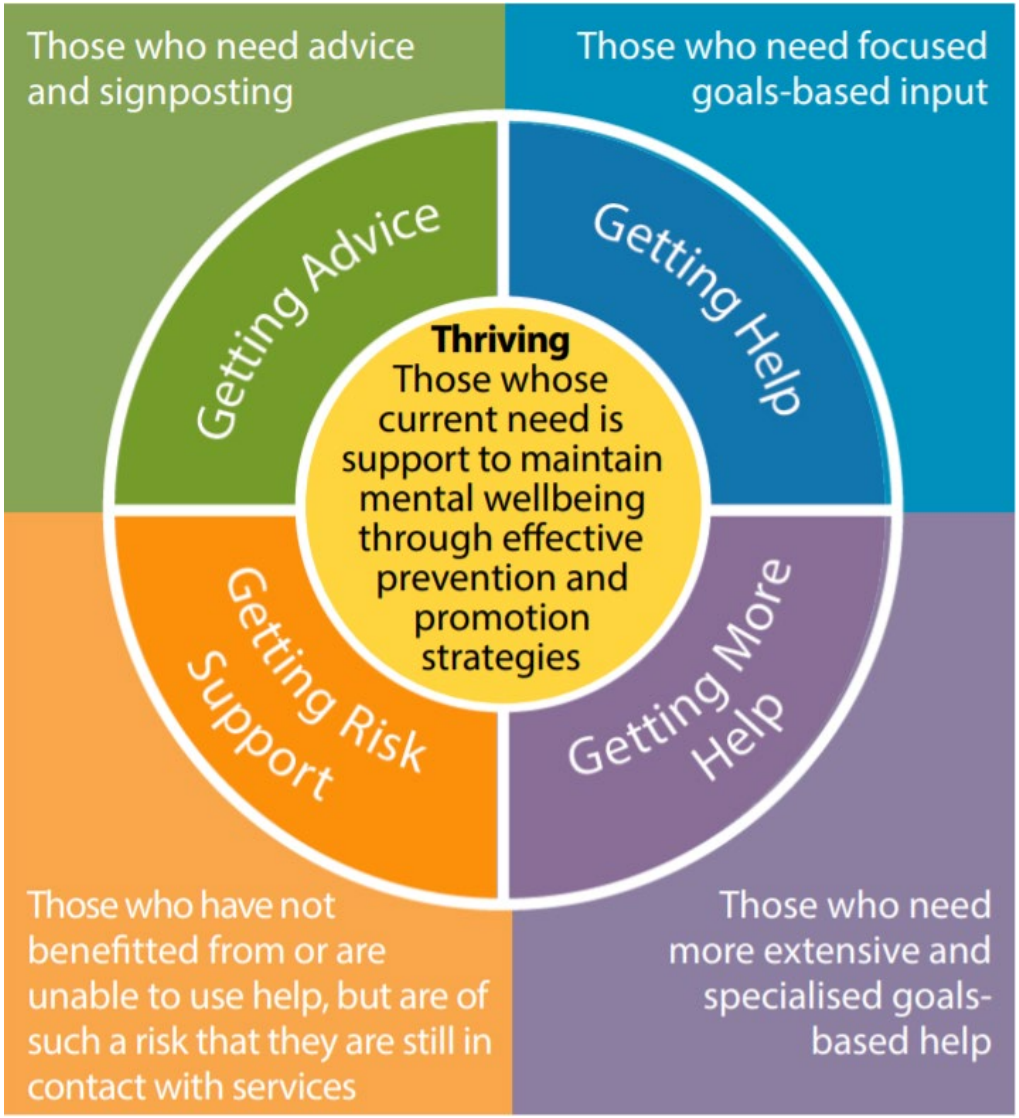
The aim must be to resolve a difference of opinion at the earliest possible stage, as swiftly as possible, always keeping in mind that the priority must be keeping the child or young person safe. In the unlikely event of issues escalating to Stage 6, the role of the MSCB Independent Chair is one of mediation; decision making responsibility remains with statutory agencies.



Issued September 2017
For more information visit www.manchestersafeguardingboards.co.uk

Appendix K: Loreto Mental Health Framework

Level 1



Level 2

Level 4

Level 3

Presenting Difficulties	Criteria	Thrive Quadrant	Intervention	Resources
Low Mood	Early signs of low mood Concerns might be raised about a student's progress by teachers, or they may self-refer. Students will be accessing most/all lessons and completing work generally to the standard expected.	**Level 1** **Getting Advice**	Signposting to advice and support	✓ **Useful Contacts** on student log ✓ **Sharepoint** resources on myLoreto ✓ **Young Minds** ✓ **Kooth** kooth.com ✓ **Childline** ✓ **Samaritans** ✓ **Apps** ✓ **Counselling drop-in**
Low Mood	Persistent low mood of at least 2 weeks in duration at a level that is impacting on daily functioning Students may be struggling to engage with studies, or complete work. Attendance may be affected in one or more subjects.	**Level 2** **Getting Help**	Conversation with parent Refer to GP Counselling	✓ **42nd Street** http://42ndstreet.org.uk/referrals/ ✓ **College Pastoral Team** ✓ **Wellbeing Offer** Trafford https://www.trafforddirectory.co.uk Salford https://www.partnersinsalford.org/salford-0-25-advisory-board/salford-thrive-ehwb/emotional-health-service-directory/ Stockport https://www.stockport.gov.uk/mental-wellbeing-support-coronavirus/help-if-youre-under-the-age-of-18 Manchester https://m-thrive.org/ ✓ **Kooth.Com** on line Counselling https://kooth.com/ ✓ **CAMHS IAPT Services** (routine) https://mft.nhs.uk/rmch/services/camhs/ ✓ **College counselling** ✓ **Shout 24/7 text helpline** https://giveusashout.org/ ✓ **Manchester Mind** https://www.manchestermind.org/ For 13-25 year olds 0161 769 5732. Counselling for young people Referrals can be made by phone, email or online. ✓ **Self help services** https://www.selfhelpservices.org.uk/

Presenting Difficulties	Criteria	Thrive Quadrant	Intervention	Resources
Depression or Mood Disorder (including mood dysregulation	Low mood that has not responded to "getting help interventions", Or current presentation of Clinical Depression / Mood Disorder. Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis.	**Level 3** **Getting More Help**	Further contact with parent Further contact with GP Referral to Mental Health Team	✓ **Referral to locality specific support** i.e. Emerge, Healthy Young Minds, Healthy Minds ✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS**
Self-Harm	Thoughts of self-harm only: Concerns might be raised by teachers, or they may self-refer. Students will be accessing most/all lessons and completing work generally to the standard expected.	**Level 1** **Getting Advice**	Signposting to advice and support	✓ **Useful Contacts** on student log ✓ **Young Minds** https://youngminds.org.uk/ ✓ **Kooth** ✓ **Childline** ✓ **Apps** https://calmharm.co.uk/ ✓ https://selfharm.co.uk/ ✓ **Counselling drop-in**
Self-Harm: That is infrequent and not require medical intervention	Self-harm is when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress. Students may be struggling to engage with studies, or complete work. Attendance may be affected in one or more subjects.	**Level 2** **Getting Help**	Conversation with parent Refer to GP Counselling	✓ **42nd Street** https://www.42ndstreet.org.uk/ ✓ **College Pastoral Team** ✓ **Shout 24/7 text helpline** https://giveusashout.org/ ✓ **Kooth.Com** on line Counselling https://kooth.com/ ✓ **National Self Harm Network** http://www.nshn.co.uk/downloads.html ✓ **Young Minds Website** https://youngminds.org.uk/ ✓ **College Counselling** ✓ **Wellbeing Offer** Trafford https://www.trafforddirectory.co.uk Salford https://www.partnersinsalford.org/salford-0-25-advisory-board/salford-thrive-ehwb/emotional-health-service-directory/ Stockport https://www.stockport.gov.uk/mental-wellbeing-support-coronavirus/help-if-youre-under-the-age-of-18 Manchester https://m-thrive.org/

Self-Harm : That has become more frequent and intense Suicidal Ideation with some plans and or few protective factors and or increased identified risk factors	Where a student has a history of self-harm and is currently harming more frequently and is as risk of significant harm. Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis. N.B if the student needs immediate medical intervention –they will need to attend at their local A&E.	**Level 3** **Getting More Help**	Medical Intervention (GP/Walk In Centre/Emergency Department A and E) Mental Health / Risk Assessment Safety Planning Further contact with parent Further contact with GP Referral to Mental Health Team, if Manchester or Salford speak to Emerge Duty Worker for advice.	✓ **Referral to locality specific support** i.e. Emerge, Healthy Young Minds, Healthy Minds ✓ **Local Medical Services** https://www.nhs.uk/using-the-nhs/nhs-services/urgent-and-emergency-care/nhs-111/ ✓ **Liaison Mental Health (LMH)** https://www.gmmh.nhs.uk/mental-health-liaison/ ✓ **CAMHS Urgent / Duty Referral** ✓ **Rapid Response Team (via 111)** ✓ **Ongoing support** from Head of Hall in coordination with external Mental Health team. ✓ **Crisis Helplines:** **Manchester Mental Health 24/7 Helpline:** 0800 953 0285 **Crisis Café –** 0161 271 0339 or 07778 012 838

Suicidal Thoughts	Where a student is expressing some fleeting thoughts with no plan and has identified protective factors. *students can move quickly through the suicide continuum and therefore it is important that parents/carers are informed and advice given on support. Students may be struggling to engage with studies, or complete work. Attendance may be affected in one or more subjects.	**Level 2** **Getting Help**	Conversation with parent Refer to GP Counselling Consider Risk Assessment Safety Planning/Care Plan Self Help strategies – Guided Self Help Psycho- Education	✓ **42nd Street** ✓ **College Pastoral Team** ✓ **College Counselling** ✓ **Wellbeing Offer** ✓ **Kooth.Com** on line Counselling ✓ **Shout 24/7** text helpline https://giveusashout.org/ ✓ **Papyrus** –Suicide Prevention https://papyrus-uk.org/ ✓ **HOPEline UK** Call: 08000 684141, Text: 07786 209 697 Email: pat@papyrus-uk.org 9am – midnight every day of the year ✓ **Shining a Light on Suicide** https://www.shiningalightonsuicide.org.uk/feeling-suicidal/ help if you're feeling suicidal, concerned about someone or bereaved by suicide ✓ **Wellbeing Offer** Trafford https://www.trafforddirectory.co.uk Salford https://www.partnersinsalford.org/salford-0-25-advisory-board/salford-thrive-ehwb/emotional-health-service-directory/

				Stockport https://www.stockport.gov.uk/mental-wellbeing-support-coronavirus/help-if-youre-under-the-age-of-18 Manchester https://m-thrive.org/
Suicidal Ideation	Where a student is presenting with increased and intrusive suicidal thoughts and or regular increased self-harm. A student may disclose an attempt at suicide. *students can move quickly through the suicide continuum and therefore it is important that parents/carers are informed and advice given on support. Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis.	**Level 3** **Getting More Help**	Further contact with parent Further contact with GP Mental Health / Risk Assessment Safety Planning / Care Plan Psycho Education Self-Regulation Referral to Mental Health Team, if Manchester or Salford speak to Emerge Duty Worker for advice.	✓ **CAMHS Urgent / Duty Referral** ✓ **Rapid Response Team (via 111)** ✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS** ✓ **Crisis Helplines:** **Manchester Mental Health 24/7 Helpline:** 0800 953 0285 **Crisis Café –** 0161 271 0339 or 07778 012 838
Actual Significant Self Harm or Overdose /Need for Medical Intervention	**If a student presents with significant self-harm and or has taken substances / overdosed.** **Send to A and E immediately.**	**Level 4** **Getting Risk Support**	**Medical Intervention** **Risk Assessment** **Safety Planning** **Admission**	✓ **Medical Services** ✓ **Mental Health Liaison Team** ✓ **Ongoing support** from Head of Hall in coordination with external Mental Health team ✓ **Crisis Helplines:** **Manchester Mental Health 24/7 Helpline:** 0800 953 0285 **Crisis Café –** 0161 271 0339or 07778 012 838

Anxiety	Anxiety at a level that is having some impact on the student's functioning. This may be in relation to a specific event such as exams or transition. The student is still accessing most/all of their timetable and making progress in line with that expected. A student is likely to disclose their concerns directly to a member of staff.	**Level 1** **Getting Advice**	Signposting to advice and support Teachers aware via sensitive note Consider temporary adjustments in college An adjustment to their timetable such as moving RE may help	✓ **HoH** ✓ **College Pastoral Team** ✓ **Useful Contacts** on student log ✓ **Young Minds** ✓ **Kooth** ✓ **Childline** ✓ **Apps** ✓ **College wellbeing guides** ✓ **Chaplaincy space** ✓ **Panic attacks:** https://nopanic.org.uk/ ✓ **Counsellor drop ins**
Anxiety including: • Phobias • Panic Disorder • Social Phobia • Generalised Anxiety Disorder • Obsessive-Compulsive Disorder	Anxiety at a level that is affecting the student's development or level of functioning, over a sustained period of time and this is not a normal adjustment reaction to a life event / adverse event. The impact on a student may be evidenced by low attendance in one or more subjects or struggling to make progress.	**Level 2** **Getting Help**	Conversation with parent Home/student Contact GP Counselling Signpost to Kooth.com Make temporary adjustments in college • Timetable change Referral to • 42nd Street • College Counsellors • GP Consider student action plan	✓ **HOH** ✓ **42nd Street** http://42ndstreet.org.uk/referrals/ ✓ **College Pastoral Team** ✓ **Shout 24/7 text helpline** https://giveusashout.org/ ✓ **Wellbeing Offer** Trafford https://www.trafforddirectory.co.uk Salford https://www.partnersinsalford.org/salford-0-25-advisory-board/salford-thrive-ehwb/emotional-health-service-directory/ Stockport https://www.stockport.gov.uk/mental-wellbeing-support-coronavirus/help-if-youre-under-the-age-of-18 Manchester https://m-thrive.org/ ✓ **Kooth.Com** on line Counselling https://kooth.com/ ✓ **CAMHS IAPT Services** (routine) https://mft.nhs.uk/rmch/services/camhs/ ✓ **College counselling**
Prolonged / More Frequent/ Intense Anxiety	More Intense repetitive, intrusive thoughts, behaviour affecting daily life, quality of life and activity. Obsessions/Compulsions causing functional impairment.	**Level 3** **Getting More Help**	Referral to GP/ Emerge/Healthy Minds if not already undertaken Parents/Carer informed unless safeguarding concern Student action plan in place	✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS**

	Students may be struggling to engage in much of college. They may be 'present' in lessons, but little progress is made. Or they have large gaps in their attendance.			

Post-Traumatic Stress Disorder (PTSD)	Avoidance of reminders of the traumatic event. Persistent anxiety. Intrusive thoughts and memories e.g. nightmares. Sleep disturbance. Hypervigilance. Symptoms continuing longer than three months following event	**Level 3** **Getting More Help**	Medication Referral to GP/ Emerge/Healthy Minds if not already undertaken Parents/Carer informed unless safeguarding concern	✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS**

Major Mental Health Difficulties / Psychosis	Active symptoms Inc. Paranoia, delusional beliefs & abnormal perceptions, (hearing voices & other hallucinations). Fixed, unusual ideas. Negative symptoms Including deterioration in self-care & social & family functioning. Students may be struggling to engage in much of college. They may be 'present' in lessons, but little progress is made. Or they have large gaps in their attendance.	**Level 3** **Getting More Help**	Extend Assessment Referral to EIS services Psycho-Ed Medication CBT	✓ **14-18 years refer to Early Intervention Services** https://www.gmmh.nhs.uk/early-intervention/ ✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS** ✓ **Crisis Helplines:** **Manchester Mental Health 24/7 Helpline:** 0800 953 0285 **Crisis Café –** 0161 271 0339or 07778 012 838

Eating Difficulties	Early signs of difficulties with eating. The student is still accessing most/all of their timetable and making progress in line with that expected. A student may disclose their concerns directly to a member of staff	**Level 1** **Getting Advice**	Signposting to advice and support Teachers aware via sensitive note Consider temporary adjustments in college An adjustment to their timetable such as moving RE may help	✓ **HoH** ✓ **College Pastoral Team** ✓ **Useful Contacts on student log** ✓ **Young Minds** ✓ **Kooth** ✓ **Childline** ✓ **Apps** ✓ **College wellbeing guides** ✓ **Chaplaincy space** ✓ **Counsellor drop in**

Eating difficulties	Concerns about weight loss or prolonged difficulties. The impact on a student may be evidenced by low attendance in one or more subjects or struggling to make progress.	**Level 2** **Getting Help**	Referral to locality specific support ie Emerge, Healthy Young Minds, Healthy Minds Conversation with parent Home/student Contact GP Counselling Signpost to Kooth.com Make temporary adjustments in college • Timetable change Referral to • 42nd Street • College Counsellors • GP Consider student action plan	✓ **14-18 years refer to Early Intervention Services** Under 14 CAMHS https://www.gmmh.nhs.uk/early-intervention/ ✓ **42nd Street** http://42ndstreet.org.uk/referrals/ ✓ **College Pastoral Team** ✓ **Wellbeing Offer** Trafford https://www.trafforddirectory.co.uk Salford https://www.partnersinsalford.org/salford-0-25-advisory-board/salford-thrive-ehwb/emotional-health-service-directory/ Stockport https://www.stockport.gov.uk/mental-wellbeing-support-coronavirus/help-if-youre-under-the-age-of-18 Manchester https://m-thrive.org/ ✓ **Kooth.Com** on line Counselling https://kooth.com/ ✓ **CAMHS IAPT Services** (routine) https://mft.nhs.uk/rmch/services/camhs/ ✓ **College counselling**
Eating Disorders	Anorexia Nervosa / Bulimia Nervosa, Binge Eating Disorder. Students may be struggling to engage in much of college. They may be 'present' in lessons, but little progress is made. Or they have large gaps in their attendance.	**Level 3** **Getting More Help**	Family Based Treatment, Specialist Family Therapy for Anorexia / Bulimia Nervosa, Adolescent Focused Therapy , CBT , Physical Monitoring, Community Re-feeding	✓ **CAMHS Eating Disorder Service** ✓ **HOH would write to GP if required** ✓ **HOH telephone parents** ✓ **HOH complete referral to Emerge or CAMHS**
Eating Disorders	Students with a diagnosed eating disorder and receiving intervention from services, they may be admitted to hospital.	**Level 4** **Getting Risk Support**		✓ **HOH to liaise with hospital team how best to provide education support.**

Complex Behavioural Problems / Emotional Dysregulation	Student's unable to benefit from or engage with recommended interventions but remain a significant concern or risk, including those who routinely go into crisis or don't/ Can't make use of help.	**Getting Risk Support**	Liaison with the network to develop a multiagency shared care Risk Assessment and management plan **Actions include** Calling for and attending Social Care Strategy Meetings, Child Protection Conferences, Edge of Care Meeting, School / College Safeguarding / Fitness to Learn Meetings, Police Silver and Gold Strategy Meetings, CAMHS Risk Assessment Management Meetings (RAMM), In-patient Emergency Admissions and Discharge Meetings.	**All Services / Providers Share Responsibility for getting a Child or Young Person Risk Support** Getting Risk Support it is a multiagency / multidisciplinary approach. We are all responsible for the safety of the children and young people we see, therefore all services / professionals need to be involved in the development of a cross agency multi-disciplinary risk plan, working in conjunction with the child / young person and their family/carers / support networks. Including: Social Care, Police, Ambulance and Fire Services, Accident and Emergency Departments, Schools, Collages, 3rd / Voluntary Sector, Crisis Support Services, Liaison Mental Health, Home Treatment Teams, GP, Community Nurses, Safeguarding Practitioners, 111, Crisis Help Line Providers, Early Help Hub, Youth Workers, CAMHS etc.

REFERRALS THAT WOULD NOT BE APPROPRIATE FOR MFT CAMHS INCLUDE:

- Exclusively school-based difficulties, which may be more appropriately dealt with by an Educational Psychologist, or other staff within Education e.g. dyslexia, behaviour at school and underachievement.
- Normal adjustment reactions to distressing life events such as trauma, parental separation, bereavement.
- Residency and contact disputes.
- Assessment specifically for court purposes.
- Age-appropriate temper tantrums, feeding and sleeping difficulties in the under 5s. (These may be more appropriately referred to evidence-based parenting programmes accessed in the community).
- Behavioural problems that are non-complex, where family support needs could be provided by Children's Services.
- Concerns about developmental progress. These should be referred to a Community Paediatrician in the first instance.
- Problems that are primarily related to substance misuse - please refer to your local drug and alcohol services.
- Safeguarding Concerns: refer to Children's Services.

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- Safeguarding Concerns: refer to Children's Services.

For referrals assessed/rated as not meeting the threshold criteria for CAMHS we will give you and the family / young person information about other services available which include:

- **Gaddum** Centre: Young Carers, bereavement Counselling https://www.gaddumcentre.co.uk/ [Tel: 0161 834 6069]
- **NSPPC**: Work with children who have parents with mental health/substance misuse problems. Work with children and young people who display harmful sexual behaviour and/or have experienced abuse. https://www.nspcc.org.uk/ [Tel: 0844 892 0225]
- **42ND Street**: Provision for young people 13 – 25yrs offering a range of services including counselling, individual support (e.g. anger management) group work (e.g. relaxation) and volunteering opportunities. http://42ndstreet.org.uk/referrals/
- **Manchester Eclypse**: Drug & Alcohol Misuse Counselling Service https://www.changegrowlive.org/eclypse/info [Tel: 0161 839 2054]
- **Salford Achieve:** Drug & Alcohol Service https://www.gmmh.nhs.uk/achieve *Tel: 0161 358 1530*
- **Salford Primary Care Mental Health Services** http://six-degrees.org.uk/ Southwood House, Greenwood Business Centre, Regent Rd, Salford M5 4QH
  Hours: Open · Closes 5PM Phone: 0161 983 0900
- **Manchester Early Help Hubs:**
  - Early Help Hub – North earlyhelpnorth@manchester.gov.uk [Tel: 0161 234 1973]
  - Early Help Hub – Central earlyhelpcentral@manchester.gov.uk [Tel: 0161 234 1975]
  - Early Help Hub – South earlyhelpsouth@manchester.gov.uk [Tel: 0161 234 1977]

- **Salford Early Help:** https://www.salford.gov.uk/children-and-families/early-help-for-families/early-help-services/ or email: EHAT@salford.gov.uk [Tel: 0161 603 4239]

- **Manchester Mind / YASP** https://www.manchestermind.org/our-services/cyp/
- **School Nurses and Educational Psychologists**: Please contact school direct.
  https://www.manchester.gov.uk/directory/84/school_finder
  http://schoolswebdirectory.co.uk/leasearch.php?lea=salford
- **Manchester Special Educational Needs Offer** www.manchester.gov.uk/sendlocaloffer

For more resources by area, please see the Greater Manchester Health and Social Care Partnership for Mental Health https://hub.gmhsc.org.uk/mental-health/in-your-area/

Appendix L: Further information for Governors

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

According to the Equality Act, schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

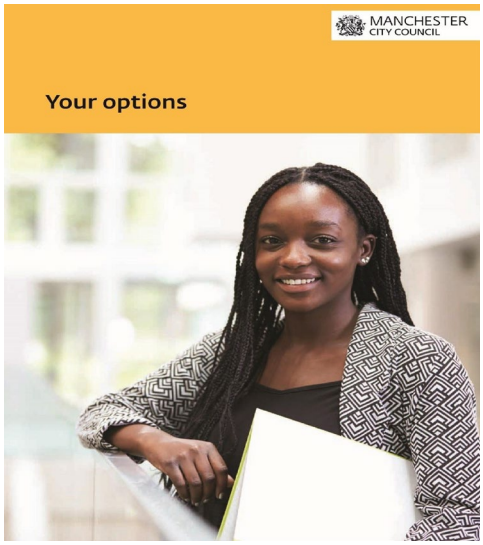
Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant

protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

Appendix M: 16-17 Manchester Positive Housing Pathway



If you are 16/17, live in MCR and your housing situation is breaking down you can seek advice and support from the 16-17 Manchester Positive Housing Pathway.

The Positive Housing Pathway will offer you a dedicated Social Worker who will look into your personal situation.

Your Social Worker will listen to your views and any concerns you may have to help identify an appropriate support plan for you.

Your support plan will involve your Social Worker who will try to negotiate a safe return home or they could look at you staying with extended family or close friends.

If returning back home is confirmed as a safe and suitable option, then your Social Worker can help
you look at ways to improve things there

- You might want help to resolve disputes in the family home.
- You could be supported to get into education/employment.
- You might need financial advice for you or your family.
- You could be in need of emotional support.
- There could be a need for support to help you gain independent living skills to prepare for your future.

- If you have other services involved we can all work together to meet you and your and your families needs.
- You might have health needs and we can help you get the right advice and guidance.

We will complete an assessment with you to make sure we fully understand everything that is going on so we can help make the right decisions.

We could assess that returning home or to family members is not deemed suitable/safe and there are significant worries or risks that would be likely to impact on your health and wellbeing.

In these circumstances your Social Worker can look into your personal housing options so you will be safely housed and supported.

No matter which decision you make, we are committed to;

Listening and understanding your concerns and worries, as well as your strengths and achievements

Explaining why decisions are made and being the best advocates for you as we can.

Being dedicated to supporting you through personalised planning. We aim to engage with you and develop trust and respect.

For Advice

Lisa Johnston 07989 148 230

Nicola Rands 07870 166 370

Ashlea Tuck 07940 021 598

To make a referral

0161 234 5001

Some independent organisations

Coram Voice.
Always Heard Helpline on 0808 800 5792.
https://coramvoice.org.uk/

National Youth Advocacy Service Helpline: 0808 808 1001 **https://youngpeople.nyas.net/**