



SAFEGUARDING AND CHILD PROTECTION POLICY

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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
- link into other relevant college policies – no single professional can have a full picture of a child's needs and circumstances.

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

1. Statutory Framework

Loreto College recognises that all members of staff and learners have an important role to play in safeguarding the welfare of children and vulnerable adults and preventing their abuse. ‘Safeguarding and promoting the welfare of children is **everyone’s** responsibility.’ (Keeping Children Safe in Education, September 2019)

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 (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 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 and in line with government publications 'Working Together to Safeguard Children' (2018), 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 2020).

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

2. Roles and Responsibilities

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 learners 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 Senior Designated Safeguarding Lead, Mrs Andrea Pritchard, Deputy Principal, who can be contacted on 0161 226 5156 ext. 391.

It is the responsibility of the Senior 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 Senior Designated Safeguarding Lead. Deputy Designated Safeguarding Leads are trained to the same standard level as the Senior Designated Safeguarding Lead. The Senior Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads form the Safeguarding team.

In addition to indicators of abuse and neglect the Senior Designated Safeguarding Lead and Deputies should consider whether children are at risk of abuse or exploitation in situations 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 exploitation, criminal exploitation and serious youth violence.

The Deputy Designated Safeguarding Leads are:

Laura Mullen	Ext 619
Adam Squires	Ext 448
Danny Webb	Ext 383
Ian Maddix	Ext 468
Jonty Leach	Ext 598
Cate Carr	Ext 640

Lois Scholes	Ext 596
Claire Otto	Ext 332
Helen Gettings	Ext 492
Paul Carberry	Ext 438
Stacey Appleby	Ext 590
Kay Norton	Ext 667
Kellie Taylor	Ext 350

The Senior Designated Safeguarding Lead is responsible for:

- 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.
- Referring cases where a crime may have been committed to the Police as required.
- As required, liaising with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- 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.
- Liaising with secondary schools which send students to the College to ensure that appropriate arrangements are made for the students.
- 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 and will have read and understood Part 1 of Keeping Safe in Education (September 2020).
- 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;
- ensure each member of staff has access to, and understands, the school's or 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 school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or 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 school or 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 school or 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 Senior 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.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or 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 bodies or proprietors 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 school or 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.
- 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 school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

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.
- Are encouraged to be vigilant to recognise signs of abuse (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 abuse or exploitation in situations outside of their families.
- 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)
- Jonty Leach is the Designated Teacher with responsibility for the support of Looked After Children in the College. 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)

2.4 The Governing Body

The Designated Governor for Safeguarding 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
- The college has a safeguarding policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents 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 go missing from education.
- The college operates safe 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. Governors will ensure that as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding.
- 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 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.
- They review their policies and procedures annually.
- 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.
- Governors are provided with updates as to how students are informed how 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 be careful that "over-blocking" does not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.
- 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:

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'.

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.

For schools/colleges, not providing students' personal data where the serious harm test under the legislation is met. For example, in a situations 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 GDPR. Where in doubt schools/colleges should seek independent legal advice.

2.5 Students

The college is committed to ensuring that learners are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All learners know that we have a senior member of staff with responsibility for safeguarding and know who this is. We inform learners 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 learners 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 learners 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.gcsx.gov.uk, 0161 234 1214
- **Designated Teacher for LAC:** Jonty Leach ext. 598 or jleach@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 term time.

3. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

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.

Sometimes a member of staff may have suspicions that a student is being abused or is at risk of significant harm. A student may also disclose to a member of staff that 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, 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 concerns.
- Speak to the student's Head of Hall who will discuss the issues with the Senior Designated Safeguarding Lead. They may choose to speak directly to the Senior Designated Safeguarding Lead.
- In the absence of the Senior Designated Lead, a Deputy Designated 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.

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 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 Senior/ Deputy Designated Safeguarding Lead will decide on a course of action. The Senior/ Deputy Designated Safeguarding Lead 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 Senior/ Deputy Designated Safeguarding Lead 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.

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/Vulnerable Adults.* 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.

For further information, see Appendix C regarding 'Adults At Risk'.

4. 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 behavior 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 A.9 for further information). Where concern relates to Gangs and Youth Violence, see Appendix A.8.

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 through 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 missing from education

The attendance of students is monitored as described in the Attendance Procedures. Teachers and Tutors report patterns of non-attendance to the Attendance and Retention Officer who investigates absence concerns. Consecutive absence generates an automatic alert to the Attendance and Retention 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.

5. Dealing with complaints and allegations about staff or visitors

Loreto follows the government guidance "Keeping Children Safe in Education – September 2020" Part 4.

Allegations against members of school/college staff or associated professionals and practitioners (including staff and volunteers) should be guided by the document 'Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff'. Where an allegation meets the harm threshold the procedures outlined below should be followed.

All allegations made against a member of staff and visitors including 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 child while at the same time providing support for the person against whom the allegation is made.

5.1 Allegations about teachers and other staff

All complaints, allegations or suspicions regarding members of staff, visitors or volunteers, including supply staff, must be taken seriously. Staff must not investigate these allegations or concerns. The Designated Member of Staff must notify the Principal as soon as practicable and in any event within 24 hours of disclosure or suspicion being raised.

This section refers to both employed staff, visitors and volunteers.

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.

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

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. Consideration will be made as to whether the allegation meets the following criteria. Has the person

- Behaved in a way that has or may have harmed a child/student;
- Possibly committed a criminal offence against or related to a child/student;
- 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; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any suspicion, allegation or actual abuse of a student by a member of staff 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 Deputy Designated Lead must be contacted. On being notified of any such matter, the Designated Safeguarding Lead shall:

- Take such steps, as s/he 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/her 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.

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.

After being informed of an allegation against a member of staff, the Principal or her representative (the designated safeguarding lead) will consult 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 Principal or her representative, and the Designated Officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Principal or her representative 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 contacted at qualityassurance@manchester.gcsx.gov.uk

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

Once the outcome is determined, the College will take a view on how to proceed in line with its disciplinary policies and the DfE 'Keeping Children Safe in Education, September 2020' guidance.

If an allegation does appear to meet the criteria outlined above the Principal, or representative, working with the Designated Officer (LADO), will consult with the police and children's social care services as appropriate.

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. N.B. Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently. Furthermore, suspension is a neutral, not a disciplinary act and shall be on full pay.

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

Parents/Carers of the student involved will be told about the allegation as soon as possible, if they do not already know of it, once relevant external agencies have been

contacted as appropriate e.g. the Police. Throughout the process, the College will make every effort to maintain confidentiality and guard against unwanted publicity.

The Designated Safeguarding Lead will take advice from the Designated Officer (LADO), Police and Children's Services with regard to: who needs to know, what information is to be shared, how to manage speculation and gossip, what information, if any, can be passed onto the wider community and how to manage press interest should it arise.

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.

5.2 Procedure for dealing with allegations about supply teachers.

In some circumstances colleges 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 colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or 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 and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school/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 school or college will usually take the lead because agencies do not have direct access to children or other school/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 the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or 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 school/college during the investigation.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. 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.

5.3 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 Governors.

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

5.4 Managing the situation and exit arrangements

Resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS must be made where anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The college must also consider whether a referral to the TRA is appropriate. If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school or college from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school or college would not be complying with its legal duty to make the referral.

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 with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or 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 a conclusion wherever possible.

'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 in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

5.5 Record Keeping

Details of allegations that are found to 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.

5.6 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.

5.7 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.

5.8 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.

5.9 Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step. If the Designated Safeguarding Lead is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: The Designated Safeguarding Lead must consider carefully whether the circumstances warrant suspension from contact with children at the college or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the designated officer(s). In cases 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 should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

The Designated Safeguarding Lead should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases, an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, 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 or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the college so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, 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 college or school.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The Designated Safeguarding Lead should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended. If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). 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 dispatched 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. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the Designated Safeguarding Lead to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the Principal of the College, or governing body of the college who are the employers of staff. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the college consideration of suspension. 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.

5.10 Information sharing

In a strategy discussion or the initial evaluation 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.

Where the police are involved, wherever possible the employer 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 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.

Specific actions following a criminal investigation or a prosecution

The police should inform the employer and designated officer(s) immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the designated officer(s) should discuss with the case manager 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 services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to 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.

5.11 On conclusion of a case

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s) should discuss with the Designated Safeguarding Lead and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required, and, in the case of a member of teaching staff, 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 think that 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. Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Designated Safeguarding Lead should consider how best to facilitate that. 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 a student at the college.

5.12 In respect of malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) should refer the matter to the children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Principal should consider whether any disciplinary action is appropriate against the student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a student.

5.13 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 school or 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.

6. Record-Keeping

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 the Head of Hall 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.

Copies of reports, notes etc. are kept securely locked at all times.

Copies of reports regarding allegations made against staff shall be kept securely sealed by the Principal for a time directed by the Manchester Safeguarding Partnership or Disclosure Barring Service.

7. 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 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. Staff and volunteers must be clear with students that they cannot promise to keep secrets.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare and promote the safety of children. 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.

8. Safer Recruitment Procedures

Loreto College is committed to Safeguarding and promoting the welfare of children 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.

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

9. 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 an 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.

For further information, see Whistle-blowing Policy

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

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: protecting children from maltreatment; 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 known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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, rarely disclose abuse and neglect directly, if they do, it will often be through unusual behaviour or comments. This makes identifying abuse and neglect 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. 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 or maltreatment and poor outcomes intervention is sought to challenge poor parenting. In 2017 Manchester Safeguarding Partnership published the Neglect Strategy.

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

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.

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

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

The difference between a forced marriage and an arranged marriage.

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. Forced Marriage became a criminal offence in June 2014.

Possible Indicators of Forced Marriages

- Truancy
- Decline in performance or punctuality
- Low motivation at college
- Poor exam results
- Being withdrawn from s 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 as in section 3.

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.

A.3 Further information on Preventing Radicalisation

To be read in conjunction with the Loreto College 'Prevent' policy which includes updated referral forms and information published in July 2020.

Protecting children 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 by which a person comes to support terrorism and forms of extremism.
- Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.)
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

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 making a referral to the Channel program. Information regarding how to make a referral to the Channel program is displayed in all staffrooms.

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.4 Further information on Children Missing

A.4.1 Child Missing 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 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 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 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 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)

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.

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.

See DfE guidance 'Safeguarding Children and Young People from Sexual

Exploitation' 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

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)

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 school/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 of 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. There needs to be a national strategy to responding to children who are victims of exploitation.

(Childrens Society)

A.6 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.7 Further information on Domestic Abuse

The cross-government definition of domestic violence and abuse is:

any incident or pattern of incidents of controlling, coercive, 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. 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 Violence and Abuse as a key safeguarding issue for the city. The Domestic Violence and Abuse Strategy 2016- 2020 has identified clear drivers for change, which Loreto will endeavour to support in full. These include:

- An improved infrastructure to understand both risks and needs.
- Improved victim and perpetrator confidence to seek help earlier.
- Simple, clear, integrated routes into and within support for those affected
- An inclusive approach for those whom domestic violence and abuse effects.

A.7.1 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.

A.8 Further information on Gangs and Youth Violence

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 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:

[Safeguarding Children and Young People who May be Affected by Gang Activity](#)

[Reducing Knife, Gun and Gang Crime](#)

[Inquiry into Child Sexual Exploitation in Gangs and Groups \(CSEGG\)](#)

[Girls and Gangs, The Centre for Social Justice, 2014 \(research paper\)](#)

[Ending Gang and Youth Violence Community Engagement 2014](#)

[Statutory Guidance Injunctions to Prevent Gang-Related Violence and Gang-Related Drug Dealing, May 2016 \(Home Office\)](#)

[YOT Practitioner's Guide: Injunctions to Prevent Gang Related Violence \(Youth Justice Board July 2015\)](#)

[Preventing Gang and Youth Violence: Spotting Signals of Risk and Supporting Children and Young People](#)

A.9 Further information on Peer on Peer Abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. This can also include upskirting, which typically involves taking a picture under a person's clothing without them knowing with the

intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

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.

A.9.1 Sexual Violence and sexual harassment

Loreto College recognise that children are capable of abusing their peers. 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.

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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at 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 up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

Further helpful information regarding consent:

<https://www.disrespectnobody.co.uk/consent/what-is-consent/>

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

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child 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.

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

When there has been a report of sexual violence the designated safeguarding 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.

For further information see 'Sexual violence and sexual harassment between children in schools and colleges' Department for Education, May 2018.

A.9.2 Sexting

Sexting is more helpfully known as 'Youth Produced Sexual Imagery'.

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 to be treated as safeguarding issues.

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.

Responding to incidents and safeguarding your people

Initial review meeting

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 risks

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.9.3 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, 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.9.4 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.9.5 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 Further information on Mental Health

See Loreto Mental Health Policy, Department for Education guidance on Mental Health and behavior in school's March 2016 and Supporting pupils at school with medical conditions April 2014.

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 young 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 and neglect, 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 L.

A.11 Further information on Modern Slavery and Trafficking

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.

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.

<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.

Guidance can be found at:

<http://greatermanchesterscb.proceduresonline.com/chapter/phomeless1617.html>

- 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.

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

CGL Eclipse works with young people under 19 years 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 to Eclipse 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 E Safety Policy.

Loreto College has a Computer Code of Conduct, which recognises that E-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 children and young people with quality access as part of their learning experience.

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

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 material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adult posing as children or young adults; and
- conduct: personal online behaviour that increased the likelihood of, or causes harm; for example making, sending and receiving explicit images, or online bullying.

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

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.

A.18 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.

Loreto College commission Mploy Solutions to coordinate the work placements for BTEC students on relevant courses. A copy of their procedures is available from the Safeguarding Officer.

Appendix B Students potentially at greater risk of harm

B. 1 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 unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

B. 2 Pathways and Disabled students

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.

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.2 Responding to Allegations of Abuse and Follow up Procedures

College staff who have regular contact with learners are well placed to observe significant changes in behavior, 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.

Evidence suggests that some learners 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.

Appendix C

14. Safeguarding Adults

Safeguarding Adults at Risk

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.

Definition 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, bed times, 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 learners 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: mcsreply@manchester.gov.uk

Manchester Community Adult Learning Disability Team

Telephone: 0161 245 7175

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.

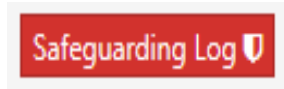
Decisions made on behalf of a person who lacks mental capacity must be done in their ‘Best Interests’ and on the basis of a ‘Reasonable Belief’ and should be the least restrictive of their basic rights and freedoms.

III 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



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.

Fields with * are required.

Date & Time of disclosure by Student *

Disclosed At Date  Disclosed At Time 

Enter the date & time that the disclosure was made.

Location of disclosure *

Location of disclosure

Enter the location where the disclosure was made.

Your account of the disclosure *

Your account of the disclosure

Enter your account of the disclosure. Please be as detailed as possible.

Student Contact Details

Student Contact Details

Enter any contact details you have for the student.

Loreto Staff members involved



Type the name of a staff member.

Type the name of any staff involved in the disclosure.

☐ I have referred this to someone

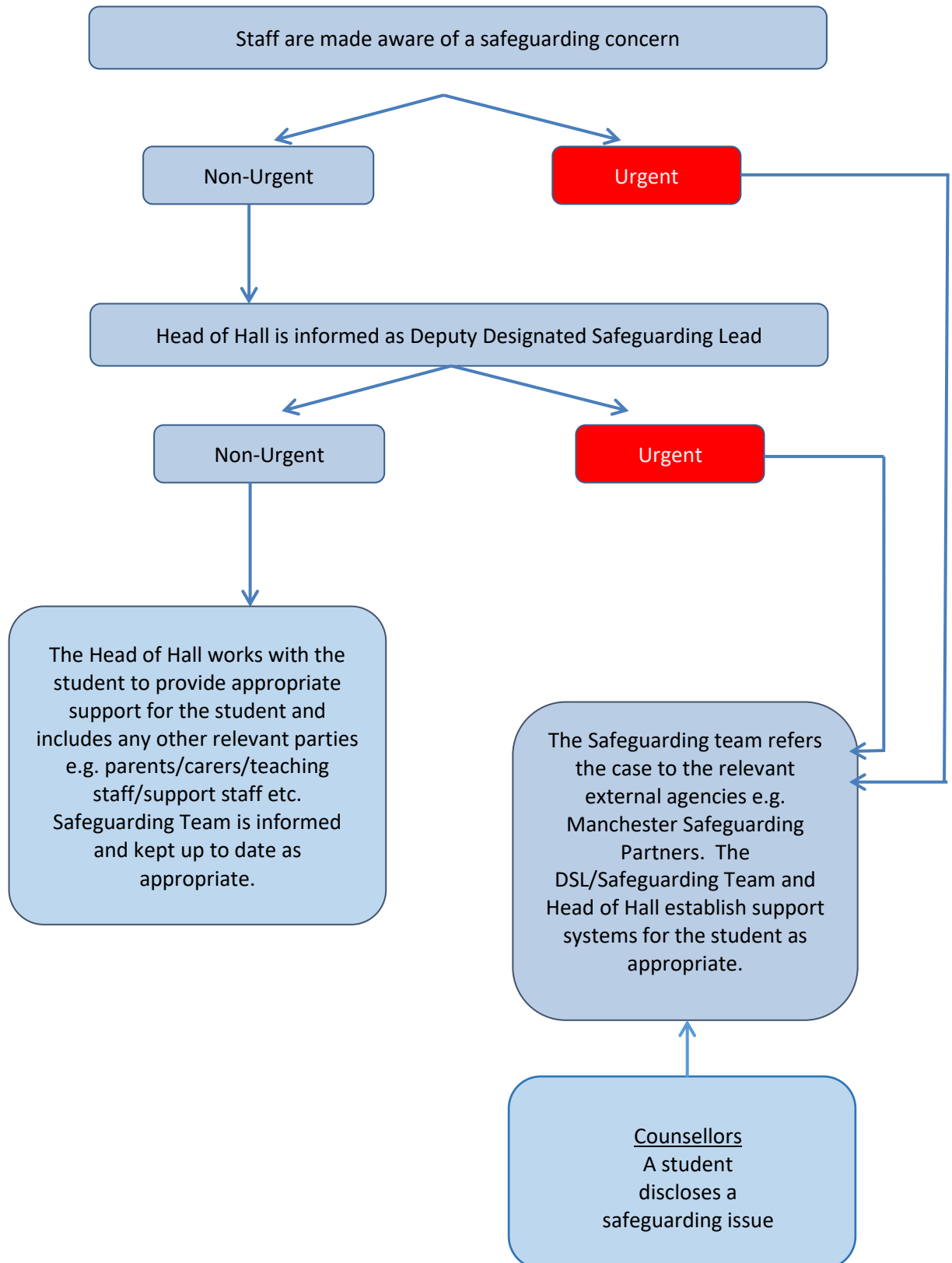
Has the student expressed concern about this information being passed on? ☐ Yes ☐ No

Select "Yes" if the student has expressed concern about this information being passed on.

Save  Back 

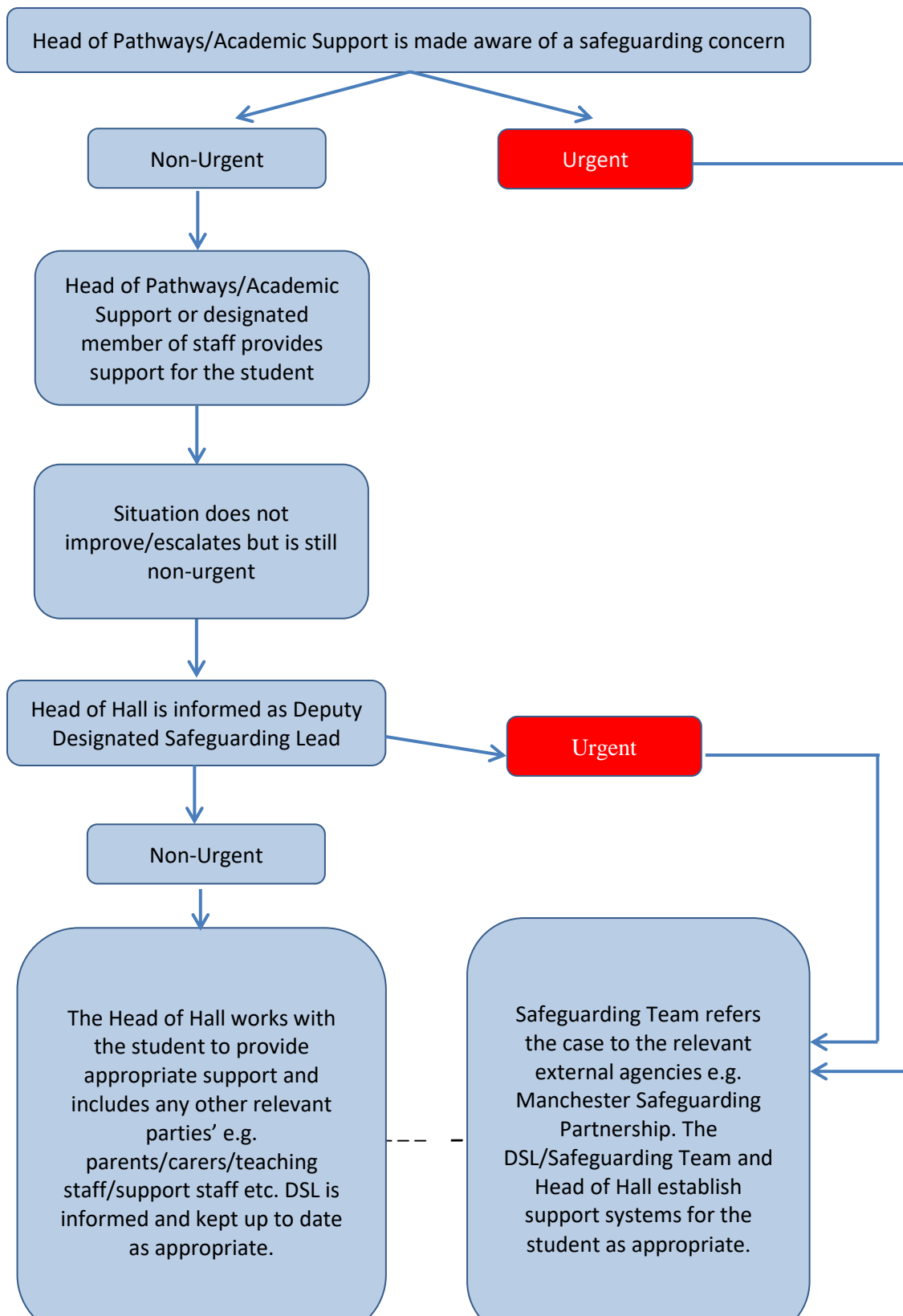
*** PASS FORM ON IMMEDIATELY EVEN IF IT IS INCOMPLETE***

College Wide Safeguarding Referral Structures



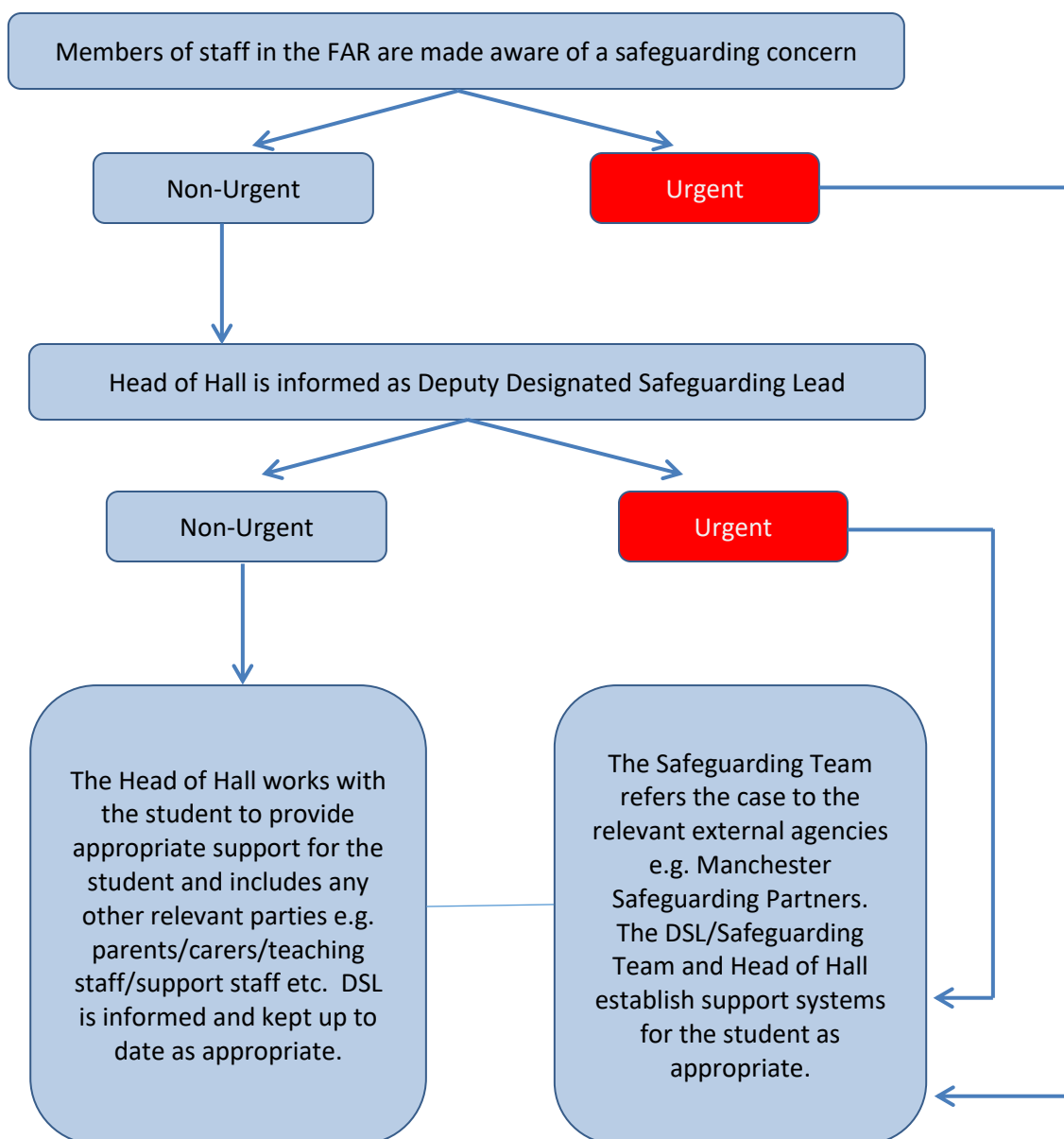
If staff are unsure as to whether a concern is urgent or non-urgent, always treat the concern as urgent. In an emergency, staff should call 999.

Safeguarding Referral Structures: Academic Support & Pathways Departments

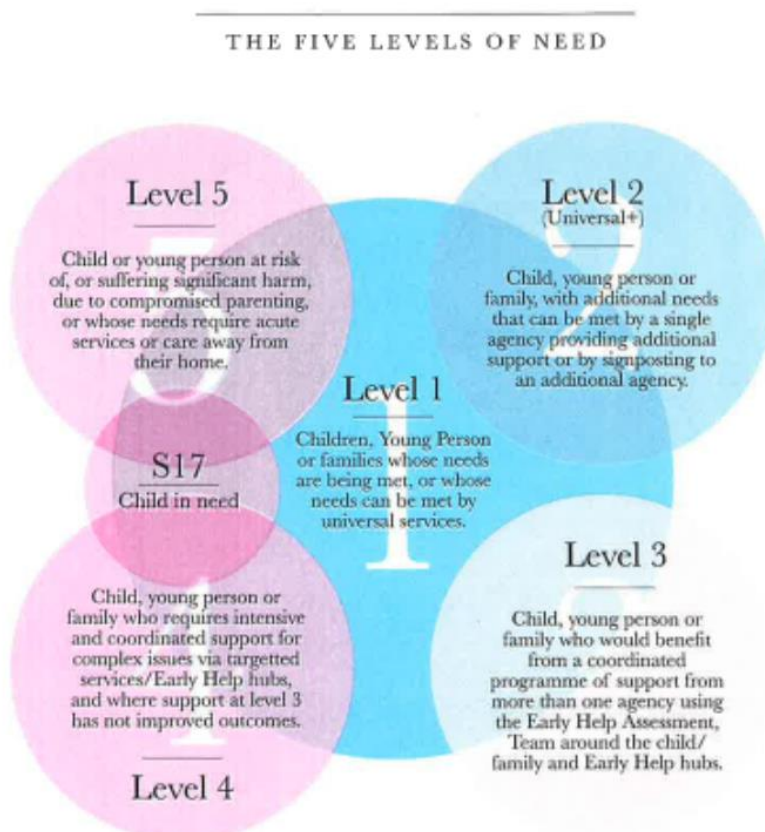


If staff are unsure as to whether a concern is urgent or non-urgent, always treat the concern as urgent. In an emergency staff should call 999.

Safeguarding Referral Structures: First Aid Room



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.



- 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.

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.

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*.

The risk and needs assessment allows Loreto College to actively consider any risks that may be posed to all students and put measures in place to keep them safe. It is not intended to replace the detailed assessments of expert professionals.

The completed risk and needs assessment should be electronically recorded on the Safeguarding Log and kept under review.

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 <i>display</i> 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	<p>‘unwanted conduct of a sexual nature’ that can occur online and offline.</p> <p>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.</p> <p>Sexual harassment can include:</p> <ul style="list-style-type: none"> • 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;

	<ul style="list-style-type: none"> • 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 <p>Online sexual harassment: This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:</p> <ul style="list-style-type: none"> • 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	<p>sexual offences under the Sexual Offences Act 2003 as described below:</p> <p><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.</p> <p><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.</p> <p><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.</p>

IDENTIFIED VICTIM	
Name of student	
DOB :	Age:
Address	
Previous school attended	
Tutor group	
Current Courses	
Previous Estimated Level of Need?	
Attendance (Current attendance, authorised absence, unauthorised absence, date of last attendance)	
<u>Peer – On – Peer Abuse</u>	Yes / No
Child Sexual Exploitation	Yes / No
Affected by Gangs or serious youth violence	Yes / No
Relationship abuse/domestic abuse in own relationships	Yes / No
Displays harmful sexual behaviour	Yes / No
Missing from Education	Yes / No
Missing from Home	Yes / No
Other (please specify):	Yes / No
<u>Information on Peer Relationships</u>	
Does the student have: Many peer relationships? A small number of peer relationships? Student is socially isolated?	
Names of young people with whom the student spends their time	
Do you consider any of the above individuals to have a positive or protective influence on the student? (please explain answer)	
Does the young person concerned appear to lead or influence the behaviour of any of their peers? (Please name which peers and explain your answer)	

Any further information regarding the nature and quality of this young person's peer associations.	
<u>Identification of vulnerability, risk and resilience factors</u>	
Is student open to Children's Services?	Yes / No
Do they have an Early Help Assessment?	Yes / No
Subject to Child Protection Plan?	Yes / No
Other agency involvement (ie CAMHS) (Please specify)	Yes / No
Does the student fall into a vulnerable group? (LAC, Traveller child, child of an asylum seeker, young carer, teenage parent, school refusers, young offender, eligible for FCM, Pupil premium, Bursary, EAL)	
Family Overview (position of child in relation to siblings, parental details etc)	
Summary of their background and current situation	
<u>Severity of presenting behaviour</u>	
Assessment of presenting behaviour <i>(Hackett's continuum of sexual behaviours)</i>	Normal / Inappropriate/Problematic/ Abusive/Violent
Assessment of presenting behaviour <i>(Traffic Light Tool)</i>	Red / Amber / Green
<u>Identifying contextual concerns</u>	
<i>(Firmans contextual circles of safeguarding)</i> Which contexts are most strongly associated to the behaviours under consideration?	Neighbourhood / College / Peer Group / Home

<u>ALLEGED PERPETRATOR</u>	
Name of student	
DOB :	Age:
Address	
Current Loreto Student	Y / N
Previous school attended	
Tutor group	
Current Courses	
Previous Estimated Level of Need?	
Attendance (Current attendance, authorised absence, unauthorised absence, date of last attendance)	
<u>Peer – On – Peer Abuse</u>	Y / N
Child Sexual Exploitation	Y / N
Affected by Gangs and or serious youth violence	Y / N
Relationship abuse/domestic abuse in own relationships	Y / N
Displays harmful sexual behaviour	Y / N
Missing from Education	Y / N
Missing from Home	Y / N
Other (please specify):	Y / N
<u>Information on Peer Relationships</u>	
Does the young person have: Many peer relationships? A small number of peer relationships? Young person is socially isolated?	
Names of young people with whom the young person spends their time	
Do you consider any of the above individuals to have a positive or protective influence on the student? (please explain answer)	
Does the young person concerned appear to lead or influence the behaviour of any of their peers? (Please name which peers and explain your answer)	

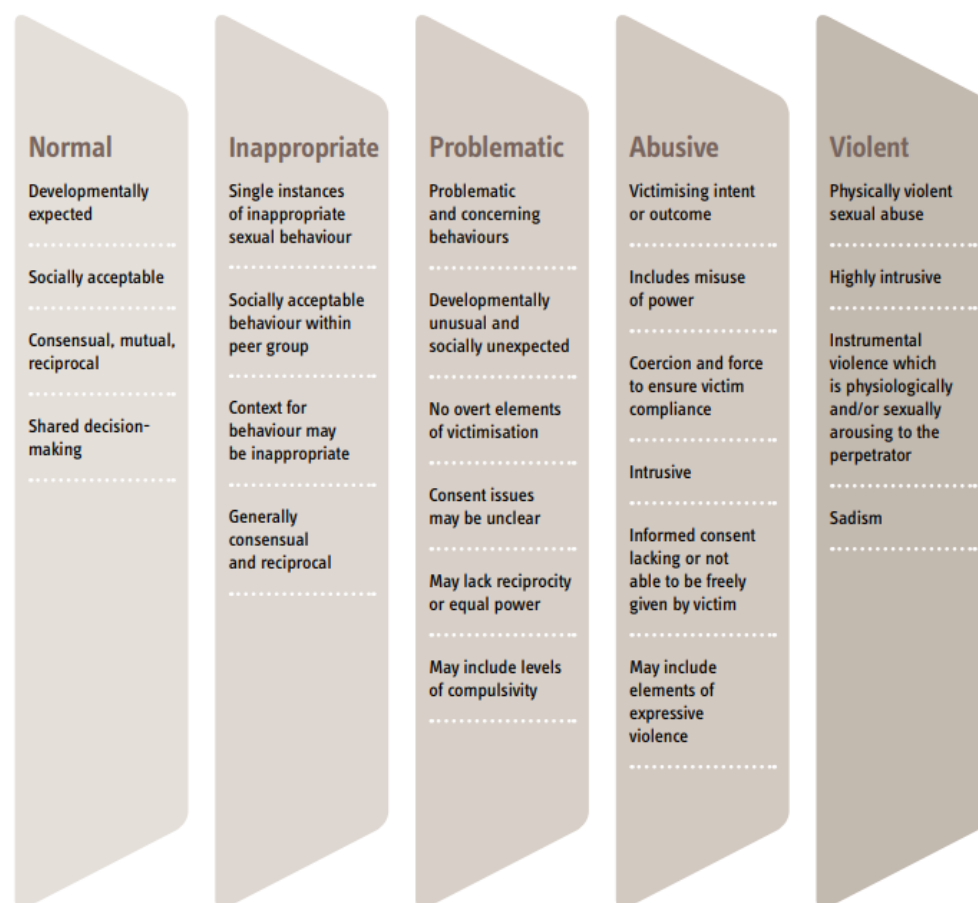
Any further information regarding the nature and quality of this young person's peer associations.	
<u>Identification of vulnerability, risk and resilience factors</u>	
Is student open to Children's Services?	Yes / No
Do they have an Early Help Assessment?	Yes / No
Subject to Child Protection Plan?	Yes / No
Other agency involvement (i.e. CAMHS) (Please specify)	Yes / No
Does the student fall into a vulnerable group? (LAC, Traveller child, child of an asylum seeker, young carer, teenage parent, school refusers, young offender, eligible for FCM, Pupil premium, Bursary, EAL)	
Family Overview (position of child in relation to siblings, parental details etc.)	
Summary of their background and current situation	
<u>Severity of presenting behaviour</u>	
Assessment of presenting behaviour (Hackett's continuum of sexual behaviours)	Normal / Inappropriate/Problematic/ Abusive/Violent
Assessment of presenting behaviour (Traffic Light Tool)	Red / Amber / Green
<u>Identifying contextual concerns</u>	
(Firmings contextual circles of safeguarding) Which contexts are most strongly associated to behaviours under consideration?	Neighbourhood/College/Peer Group/Home

Intervention plan

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 MMASA 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.

Hackett's continuum of young people's sexual behaviours



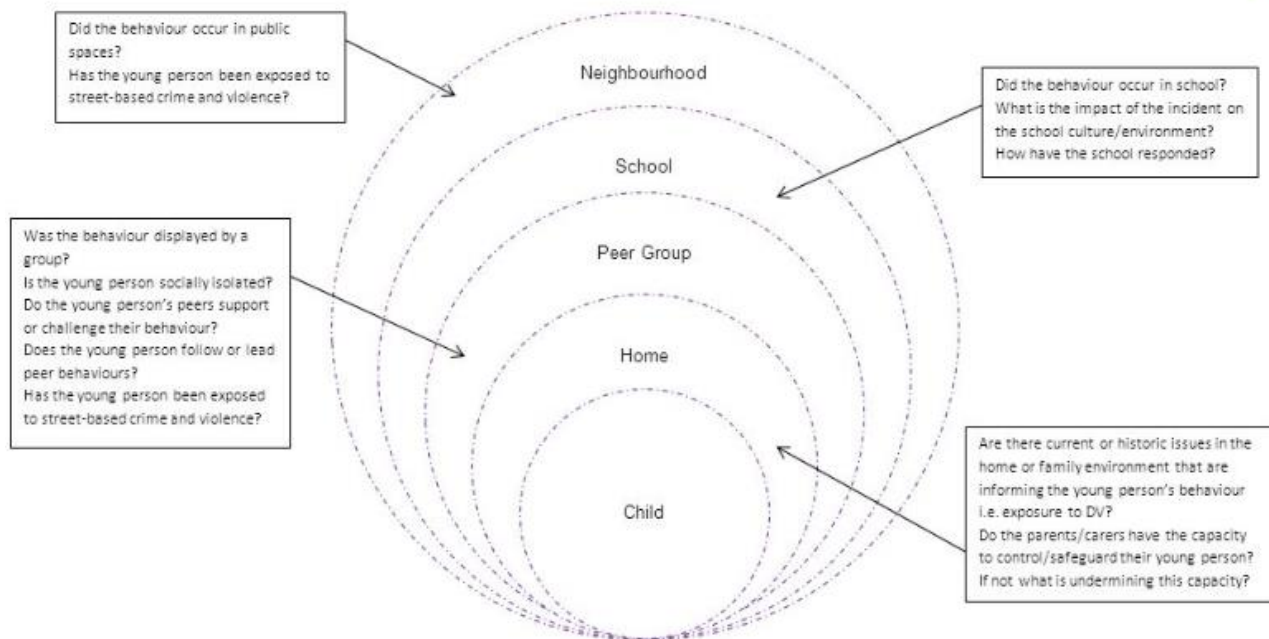
A continuum of children and young people's sexual behaviours
(Hackett, 2010)

Traffic Light Tool for 13-17 years

<u>Green behaviours</u>	<u>Amber behaviours</u>	<u>Red behaviours</u>
Solitary masturbation	Accessing exploitative or violence pornography	Exposing genitals or masturbating in public
Sexually explicit conversations with peers	Uncharacteristic and risk-related behaviour i.e. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing	Preoccupation with sex, which interferes with daily function
Obscenities and jokes within the cultural norm	Concern about body image	Sexual degradation/humiliation or self or others
Interest in erotica/pornography	Asking and sending naked or sexually provocative images of self or others	Attempting/forcing others to expose genitals
Use of internet/e-media to chat online	Single occurrence of peeping, exposing, mooning or obscene gestures	Sexually aggressive/exploitative behaviour
Having sexual or non-sexual relationships	Giving out contact details online	Sexually explicit talk with younger children
Sexual activity including hugging, kissing, holding hands	Joining adult-only social networking sites and giving false personal information	Sexual harassment
Consenting oral and/or penetrative sex with other of the same or opposite gender who are of similar age and developmental ability	Arranging a face to face meeting with an online contact alone	Non-consensual sexual activity
Choosing not to be sexually active		Use of/acceptance of power and control in sexual relationships
		Genital injury to self or others
		Sexual contact with others where there is a big difference in age or ability
		Sexual activity with someone in authority and in a position of trust
		Sexual activity with family members

		Involvement in sexual exploitation and/or trafficking
		Sexual contact with animals
		Receipt of gifts or money in exchange for sex
What is green behaviour	What is amber behaviour	What is red behaviour
<p>Green behaviours reflect safe and healthy sexual development. They are:</p> <p>Displayed between young people of similar age or development ability.</p> <p>Reflective of natural curiosity, experimentation, consensual activities and positive choices.</p>	<p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:</p> <p>Unusual for that particular young person</p> <p>Of potential concern due to age or developmental differences</p> <p>Of potential concern due to activity type, frequency, duration or context in which they occur</p>	<p>Red behaviours are outside of safe and healthy behaviour. They may be:</p> <p>Excessive, secretive, compulsive, coercive, degrading or threatening</p> <p>Involving significant age, developmental or power differences</p> <p>Of concern due to the activity, type, frequency, duration or the context in which they occur.</p>
	<p>Amber behaviours cannot be ignored, and it is important to think through the options available to you. Consider why the behaviours may be being displayed, and, where possible, gather further information and continue to monitor behaviour.</p>	<p>Red behaviours indicate a need for immediate intervention and action, though it is important to consider actions carefully. When determining the appropriate action, identify the behaviour, consider the context and be guided by:</p> <p>relevant national legislation and guidance</p> <p>organisational policies, procedures and guidance</p> <p>human rights</p> <p>the identified risks or needs of the young person</p> <p>the potential or real risks to others</p>

Firmin's Contextual Circles of Safeguarding



Transfer and receipt of Safeguarding Files

Safeguarding File Receipt

NAME OF STUDENT	
DATE OF BIRTH	
NAME OF COLLEGE RECEIVING SAFEGUARDING 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 RECEIVING 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.

Escalation Process

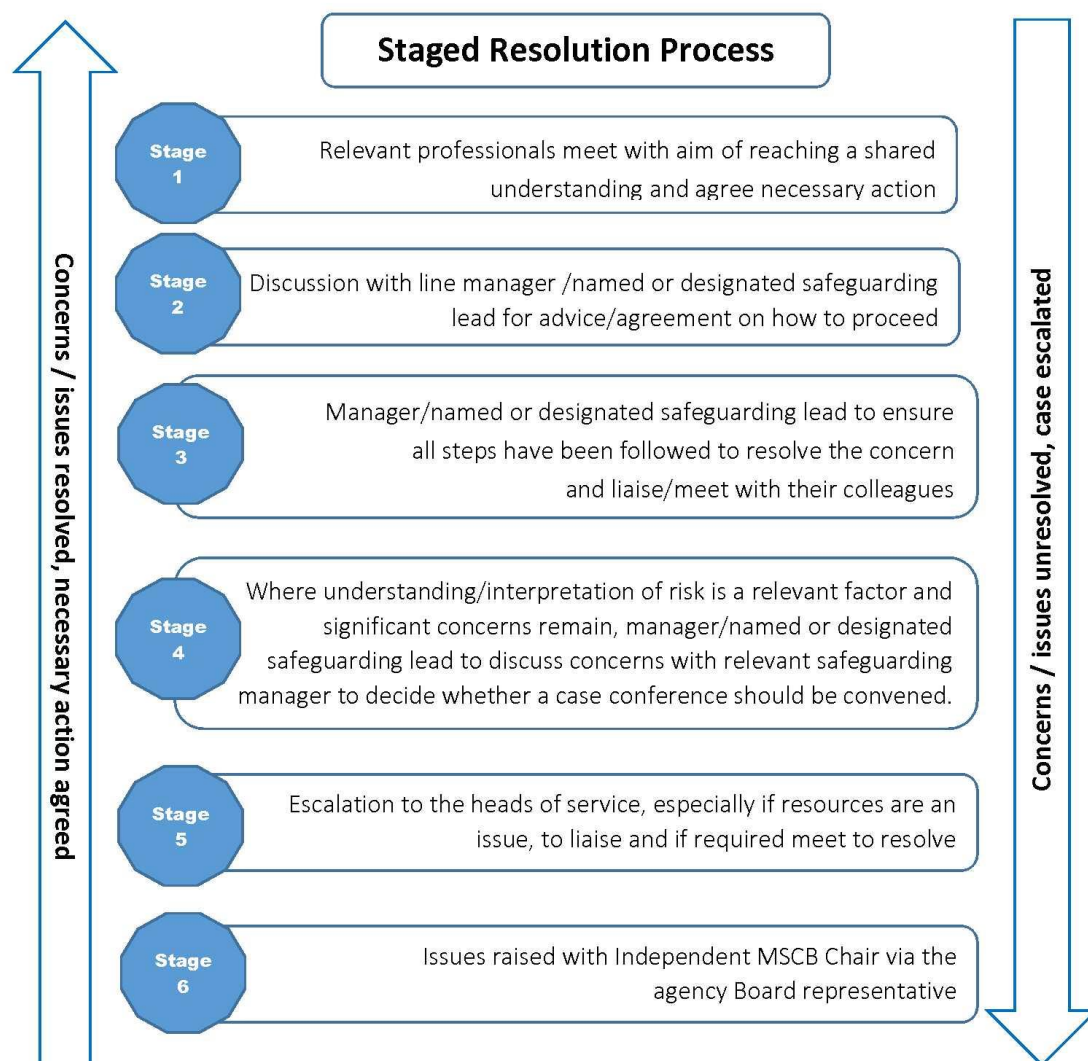


ESCALATION POLICY AND PROCESS

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

The below is a copy of the COVID-19 arrangements put into place by Loreto from the 20th March 2020 following the government guidance for parents to keep their children at home, wherever possible, and for schools and colleges to remain open only for those children of workers critical to the COVID-19 response. These procedures will be updated, as needed, in response to any future campus closure, to help ensure that the college remains open to students and staff as safely as possible.

COVID-19 College Closure Arrangements for Safeguarding and Child Protection

1. Context

From 20th March 2020 parents were asked to keep their children at home, wherever possible, and for schools and colleges to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

Schools, colleges and all childcare providers were asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This appendix summarises our individual safeguarding arrangements in response.

2. Key safeguarding contacts

The telephone number for Loreto College is **0161 226 5156**. A member of staff continues to be present to deal with enquiries each day. Voicemails are distributed throughout the day by office staff.

The email account **office@loreto.ac.uk** used for the website online contact form is managed throughout the day.

In addition, staff continue to be contactable by email or phone during office hours (9am-4pm Monday-Friday).

Role	Name	Email
Senior Designated Safeguarding Lead	Andrea Pritchard	apritchard@loreto.ac.uk
Safeguarding Team (Deputy Designated Safeguarding Leads)	Claire Otto (Safeguarding Officer)	cotto@loreto.ac.uk
	Adam Squires (Alphonsa)	asquires@loreto.ac.uk
	Laura Mullen (Bakhita)	lmullen@loreto.ac.uk
	Kay Norton (Campion)	Knorton1@loreto.ac.uk
	Helen Gettings (de Porres)	hgettings@loreto.ac.uk
	Ian Maddix (Gonzaga)	imaddix@loreto.ac.uk
	Jonty Leach (Kizito)	jleach@loreto.ac.uk
	Cate Carr (Loyola)	ccarr@loreto.ac.uk
	Lois Scholes (Poyntz)	lscholes@loreto.ac.uk
	Kellie Taylor (Rookwood)	ktaylor@loreto.ac.uk
	Danny Webb (Vaz)	dwebb@loreto.ac.uk
	Stacey Appleby (Wigmore)	sappleby@loreto.ac.uk
	Paul Carberry (Xavier)	pcarberry@loreto.ac.uk

3. Vulnerable Children

We have undertaken a scoping exercise to identify the most vulnerable students. Students classified as vulnerable by Government guidance have been contacted and letters have been sent out to parents confirming their wishes.

Vulnerable students include those who have a social worker and those students and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include students who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary,

carers, therapists or clinicians visiting the home to provide any essential services. Many students and young people with EHC plans can safely remain at home.

Eligibility for free college meals in and of itself should not be the determining factor in assessing vulnerability.

The Designated Safeguarding Lead (and deputies) know who our most vulnerable students are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

There is an expectation that vulnerable students who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and we will explore the reasons for this directly with the parent.

Loreto College offered places to our vulnerable students, including those living independently or considered to have a high level of need (including those without social workers). The overwhelming majority of students and families determined that the safest plan for them was to remain at home. After closing to the majority of students on 20th March 2020 the college has been fully closed since 25th March 2020. Therefore we encourage all of our students to attend college remotely and work safely from home.

We will continue to work with and support social workers and other external agencies to help protect vulnerable students. This includes working with and supporting social workers and the local authority Virtual School head for looked-after and previously looked-after children.

4. Attendance Monitoring

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

Procedures for education settings who have children in attendance:

If we have any students in attendance (e.g. because they are vulnerable or their parent(s) / carers are critical workers) we will submit the daily attendance sheet to the DfE by 12 noon - <https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings>

We and social workers will agree with parents/carers whether students in need should be attending college and will then follow up on any student that they were expecting to attend, who does not. We will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

To support the above, we will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at college, or discontinues, we will notify their social worker.

- As the college has closed, we will complete the return once as requested by the DfE.
- The College will also follow attendance procedures if contact proves impossible with students working at home.
- Loreto College will not be opening over the Easter break or any other holiday. However, remote support will continue to take place.

5. Designated Safeguarding Lead

The Designated Safeguarding Lead remains contactable via phone or email. The Deputy Designated Safeguarding Leads including the Heads of Hall and the Safeguarding Officer also remain contactable via phone or email.

The safeguarding team will continue to access and update our electronic safeguarding log.

The DSL and safeguarding team will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely. To access ICPC/RCPC held at Manchester Safeguarding and Improvement Unit, a report should be sent to qualityassurance@manchester.gov.uk whereby a reply email will be sent 24 hours before the conference containing the details in details and reports from other partners. Please ensure the person sending the report is the person who will be calling into the conference as the SIU will not be contacting other safeguarding staff separately.

6. Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the college Safeguarding Policy and refer to the guidance emailed by Andrea Pritchard following closure. Staff are reminded of the need to report any concern immediately and without delay.

Staff can continue to raise welfare concerns about students with their Head of Hall by using a sensitive note on the Student Log (all sensitive notes created by staff are duplicated onto the Safeguarding Log and are received by the DSL and the Safeguarding Officer). All safeguarding concerns should be recorded using the disclosure alert button in the usual way.

Where staff are concerned about an adult working with students in college, they should report the concern to the DSL.

Concerns around the Principal should be directed to the Chair of Governors. The DSL/Chair of Governors should follow the usual practice, contact the LADO and make a referral if the concern meets the threshold.

7. Safeguarding Training and induction

DSL training is unlikely to take place whilst there remains a threat of the COVID 19 virus.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing college staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2019). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers are working with us, they will continue to be provided with a safeguarding induction and all relevant information.

If staff are deployed from another education or children's workforce setting to our college, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

8. Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, we will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

If staff are deployed from another education or children's workforce setting to our college, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Where we are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

We will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

We will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing
Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any college is aware, on any given day, which staff/volunteers will be in college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

9. Online safety in schools and colleges

We will continue to provide a safe environment, including online. This includes the use of an online filtering and monitoring system. Where students are using computers in college, appropriate supervision will be in place.

10. Children and online safety away from school and college

It is important that all staff who interact with students, including online, continue to look out for signs a student may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the Staff and Governor ICT agreement and E-Safety policy.

We will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. You must not use video for delivering online teaching and learning. Loreto College are moving toward the use of Microsoft Teams to deliver remote teaching. Please refer to the document 'Microsoft Teams; Guidance for Staff' for further details.

Below are some things to consider when delivering virtual lessons:

- No 1:1s
- Staff and students must wear suitable clothing, as should anyone else in the household.
- Video cameras will be turned off prior to lessons, any interactions should be via audio or chat functions.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms specified by SLT and approved by our IT network manager.
- Staff should record, the length, time, date and attendance of any sessions held.

11. Supporting students not in college

We are committed to ensuring the safety and wellbeing of all our students.

Where the safeguarding team have identified a student to be on the edge of social care support, or who would normally receive pastoral-type support in college, they should ensure that a robust communication plan is in place for that child.

Details of this plan is recorded on the safeguarding log and includes a record of contacts that have been made. The communication plans can include; remote contact, email, phone contact, door-step visits. Other individualised contact methods should be considered and recorded. The safeguarding team will work closely with all stakeholders to maximise the effectiveness of any communication plan.

Where concerns arise, the safeguarding team will consider any referrals as appropriate. Where additional students are considered to become vulnerable communication plans may be agreed for them. Communication plans will not be ended without agreement of the DSL. The plans in respect of each student state how often they are to be reviewed.

The college will share safeguarding messages and links on its website and by email to students. Parents can access a directory of safeguarding support on the website. Students have access to the Useful Safeguarding contacts link on myLoreto.

We recognise that college can be a protective factor for students, and the current circumstances, can affect the mental health of students and their parents/carers. Our staff need to be aware of this in setting expectations of students work where they are at home.

12. Peer on Peer Abuse

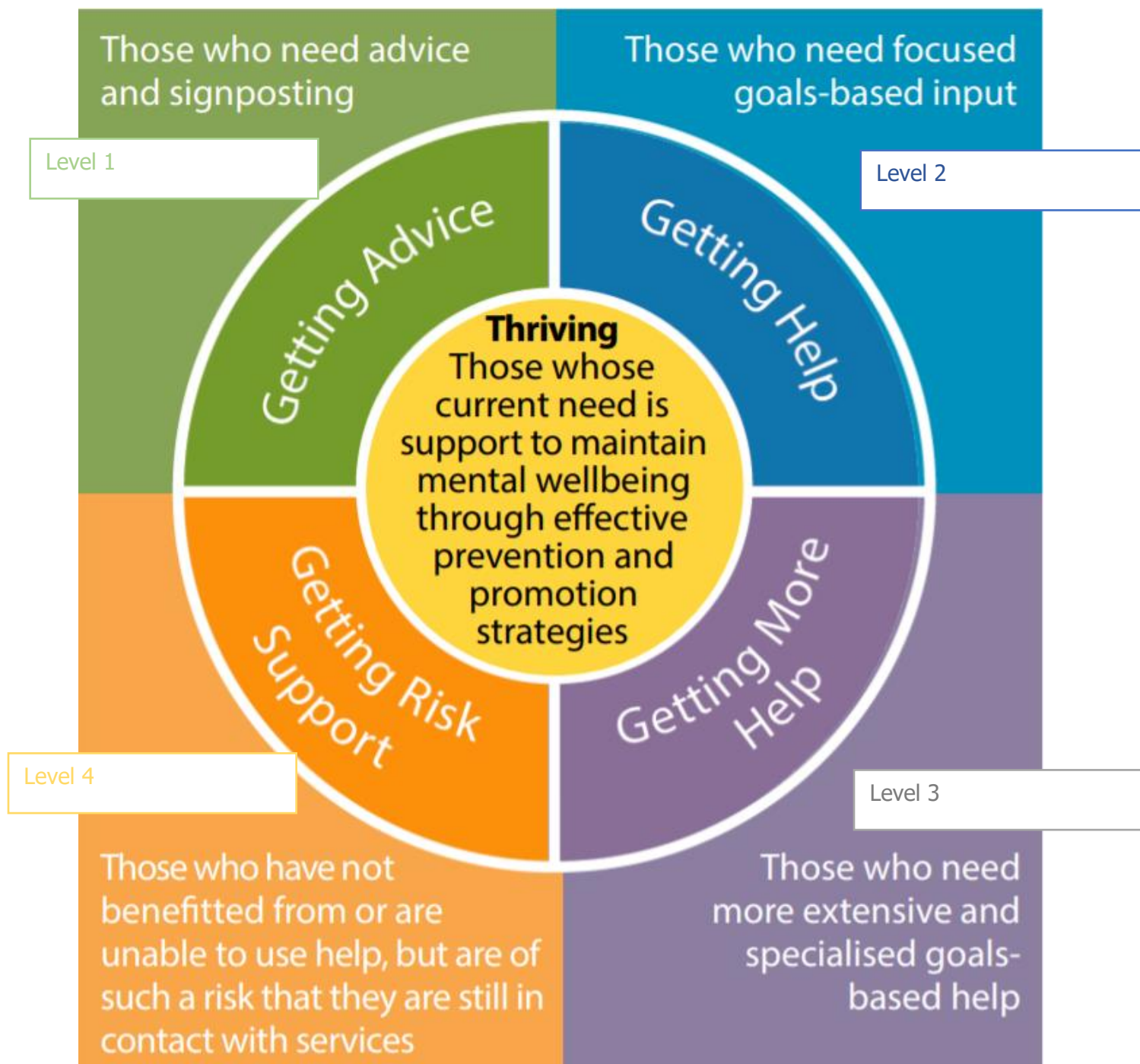
Our staff will remain vigilant to the signs of peer-on-peer abuse, including those between young people who are not currently attending our provision. Extra care should be taken where groups have mixed age, developmental stages, are attending other schools/colleges as an interim measure and similar. When making contact with these families our safeguarding team will ask about relationships between learners. We recognise that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where we receive a report of peer on peer abuse, we will follow the principles as set out in part 5 of KCSIE and of those outlined within the Safeguarding and Child Protection policy. We will listen and work with the student, parents/carers and any multi-agency partner required to ensure the safety and security of that student.

Concerns and actions must be recorded on the safeguarding log and appropriate referrals made.

13. Advice, Guidance & Support from the LA

Our DSL shares all LA updates with relevant staff and all relevant staff are aware of how to access support from our SSQA, the Safeguarding in Education Team, Virtual School and One Education as advised through the daily circulars.



Presenting Difficulties	Criteria	Thrive Quadrant	Intervention	Resources
Low Mood	<p>Early signs of low mood</p> <p>Concerns might be raised about a student's progress by teachers, or they may self-refer.</p> <p>Students will be accessing most/all lessons and completing work generally to the standard expected.</p>	<p>Level 1</p> <p>Getting Advice</p>	Signposting to advice and support	<ul style="list-style-type: none"> ✓ Useful Contacts on student log ✓ Young Minds ✓ Kooth ✓ Childline ✓ Apps ✓ Counselling drop-in
Low Mood	<p>Persistent low mood of at least 2 weeks in duration at a level that is impacting on daily functioning</p> <p>Students may be struggling to engage with studies, or complete work. Attendance may be affected in one or more subjects.</p>	<p>Level 2</p> <p>Getting Help</p>	<p>Conversation with parent</p> <p>Refer to GP</p> <p>Counselling</p>	<ul style="list-style-type: none"> ✓ 42nd Street http://42ndstreet.org.uk/referrals/ ✓ College Pastoral Team ✓ Wellbeing Offer http://www.partnersinsalford.org/youngemotionalhealth.htm https://www.trafforddirectory.co.uk ✓ Kooth.Com on line Counselling https://kooth.com/ ✓ CAMHS IAPT Services (routine) https://mft.nhs.uk/rmch/services/camhs/ ✓ College counselling
Depression or Mood Disorder (including mood dysregulation)	<p>Low mood that has not responded to "getting help interventions", Or current presentation of Clinical Depression / Mood Disorder</p> <p>Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis.</p>	<p>Level 3</p> <p>Getting More Help</p>	<p>Further contact with parent</p> <p>Further contact with GP</p> <p>Referral to Mental Health Team</p>	<ul style="list-style-type: none"> ✓ Referral to locality specific support ie 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	<p>Thoughts of self harm only</p> <p>Concerns might be raised by teachers, or they may self-refer.</p>	<p>Level 1</p> <p>Getting Advice</p>	Signposting to advice and support	<ul style="list-style-type: none"> ✓ Useful Contacts on student log ✓ Young Minds ✓ Kooth ✓ Childline ✓ Apps

	Students will be accessing most/all lessons and completing work generally to the standard expected.			✓ Counselling drop-in
Self-Harm: That is infrequent and not require medical intervention	<p>Self-harm is when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress.</p> <p>Students may be struggling to engage with studies, or complete work.</p> <p>Attendance may be affected in one or more subjects.</p>	Level 2 Getting Help	<p>Conversation with parent</p> <p>Refer to GP</p> <p>Counselling</p>	<ul style="list-style-type: none"> ✓ 42nd Street ✓ College Pastoral Team ✓ 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
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	<p>Where a student has a history of self-harm and is currently harming more frequently and is at risk of significant harm.</p> <p>Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis.</p> <p>N.B if the student needs immediate medical intervention –they will need to attend at their local A and E</p>	Level 3 Getting More Help	<p>Medical Intervention (GP/Walk In Centre/Emergency Department A and E)</p> <p>Mental Health / Risk Assessment Safety Planning</p> <p>Further contact with parent</p> <p>Further contact with GP</p> <p>Referral to Mental Health Team, if Manchester or Salford speak to Emerge Duty Worker for advice.</p>	<ul style="list-style-type: none"> ✓ Referral to locality specific support ie 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 ✓ Ongoing support from Head of Hall in coordination with external Mental Health team.
Suicidal Thoughts	<p>Where a student is expressing some fleeting thoughts with no plan and has identified protective factors</p> <p>*students can move quickly through the suicide continuum and therefore it is important that parents/carers are informed and advice given on support.</p>	Level 2 Getting Help	<p>Conversation with parent</p> <p>Refer to GP</p> <p>Counselling</p> <p>Consider Risk Assessment Safety Planning/Care Plan</p>	<ul style="list-style-type: none"> ✓ 42nd Street ✓ College Pastoral Team ✓ College Counselling ✓ Wellbeing Offer ✓ Kooth.Com on line Counselling ✓ Papyrus –Suicide Prevention https://papyrus-uk.org/

	Students may be struggling to engage with studies, or complete work. Attendance may be affected in one or more subjects.		Self Help strategies – Guided Self Help Psycho- Education	
Suicidal Ideation	<p>Where a student is presenting with increased and intrusive suicidal thoughts and or regular increased self-harm</p> <p>A student may disclose an attempt at suicide.</p> <p>*students can move quickly through the suicide continuum and therefore it is important that parents/carers are informed and advice given on support.</p> <p>Students are likely to be disengaged in their studies. Work may be incomplete, students may be struggling to attend lessons on a regular basis.</p>	Level 3 Getting More Help	<p>Further contact with parent</p> <p>Further contact with GP</p> <p>Mental Health / Risk Assessment Safety Planning / Care Plan Psycho Education Self-Regulation</p> <p>Referral to Mental Health Team, if Manchester or Salford speak to Emerge Duty Worker for advice.</p>	<ul style="list-style-type: none"> ✓ CAMHS Urgent / Duty Referral ✓ Rapid Response Team ✓ Liaison Mental Health (LMH) ✓ HOH would write to GP if required ✓ HOH telephone parents ✓ HOH complete referral to Emerge or CAMHS
Actual Significant Self Harm or Overdose /Need for Medical Intervention	<p>If a student presents with significant self-harm and or has taken substances / overdosed</p> <p>Send to A and E immediately</p>	Level 4 Getting Risk Support	<p>Medical Intervention</p> <p>Risk Assessment</p> <p>Safety Planning</p> <p>Admission</p>	<ul style="list-style-type: none"> ✓ Medical Services ✓ Mental Health Liaison Team ✓ Ongoing support from Head of Hall in coordination with external Mental Health team.
Anxiety	<p>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.</p> <p>The student is still accessing most/all of their timetable and making progress in line with that expected.</p>	Level 1 Getting Advice	<p>Signposting to advice and support</p> <p>Teachers aware via sensitive note</p> <p>Consider temporary adjustments in college</p> <p>An adjustment to their timetable such as moving RE may help</p>	<ul style="list-style-type: none"> ✓ HoH/Wellbeing Officer ✓ Useful Contacts on student log ✓ Young Minds ✓ Kooth ✓ Childline ✓ Apps ✓ College wellbeing guides ✓ Chaplaincy space ✓ Counsellor drop in

	A student is likely to disclose their concerns directly to a member of staff			
Anxiety including: <ul style="list-style-type: none"> • Phobias • Panic Disorder • Social Phobia • Generalised Anxiety Disorder • Obsessive-Compulsive Disorder 	<p>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</p> <p>The impact on a students may be evidenced by low attendance in one or more subjects or struggling to make progress.</p>	Level 2 Getting Help	<p>Conversation with parent</p> <p>Home/student Contact GP</p> <p>Counselling</p> <p>Signpost to Kooth.com</p> <p>Make temporary adjustments in college</p> <ul style="list-style-type: none"> • Timetable change <p>Referral to</p> <ul style="list-style-type: none"> • 42nd Street • College Counsellors • GP <p>Consider student action plan</p>	<ul style="list-style-type: none"> ✓ HOH ✓ 42nd Street http://42ndstreet.org.uk/referrals/ ✓ College Pastoral Team ✓ Wellbeing Offer http://www.partnersinsalford.org/youngemotionalhealth.htm https://www.trafforddirectory.co.uk ✓ 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	<p>More Intense repetitive, intrusive thoughts, behaviour affecting daily life, quality of life and activity. Obsessions/Compulsions causing functional impairment</p> <p>Students may be struggling to engage in much of college. They may be 'present'</p>	Level 3 Getting More Help	<p>Referral to GP/ Emerge/Healthy Minds if not already undertaken</p> <p>Parents/Carer informed unless safeguarding concern</p> <p>Student action plan in place</p>	<ul style="list-style-type: none"> ✓ HOH would write to GP if required ✓ HOH telephone parents ✓ HOH complete referral to Emerge or CAMHS

	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	<ul style="list-style-type: none"> ✓ 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
Major Mental Health Difficulties / Psychosis	<p>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.</p> <p>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.</p>	Level 3 Getting More Help	<p>Extend Assessment</p> <p>Referral to EIS services</p> <p>Psycho-Ed</p> <p>Medication</p> <p>CBT</p>	<ul style="list-style-type: none"> ✓ 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
Eating Difficulties	<p>Early signs of difficulties with eating</p> <p>The student is still accessing most/all of their timetable and making progress in line with that expected.</p> <p>A student may disclose their concerns directly to a member of staff</p>	Level 1 Getting Advice	<p>Signposting to advice and support</p> <p>Teachers aware via sensitive note</p> <p>Consider temporary adjustments in college</p> <p>An adjustment to their timetable such as moving RE may help</p>	<ul style="list-style-type: none"> ✓ HoH/Wellbeing Officer ✓ 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.	Level 2 Getting Help	Referral to locality specific support ie Emerge, Healthy Young Minds, Healthy Minds	<ul style="list-style-type: none"> ✓ 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/

	The impact on a students may be evidenced by low attendance in one or more subjects or struggling to make progress.		<p>Conversation with parent</p> <p>Home/student Contact GP</p> <p>Counselling</p> <p>Signpost to Kooth.com</p> <p>Make temporary adjustments in college</p> <ul style="list-style-type: none"> • Timetable change <p>Referral to</p> <ul style="list-style-type: none"> • 42nd Street • College Counsellors • GP <p>Consider student action plan</p>	<p>✓ College Pastoral Team</p> <p>✓ Wellbeing Offer http://www.partnersinsalford.org/youngemotionalhealth.htm https://www.trafforddirectory.co.uk</p> <p>✓ Kooth.Com on line Counselling https://kooth.com/</p> <p>✓ CAMHS IAPT Services (routine) https://mft.nhs.uk/rmch/services/camhs/</p> <p>✓ College counselling</p>
Eating Disorders	<p>Anorexia Nervosa / Bulimia Nervosa, Binge Eating Disorder</p> <p>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.</p>	Level 3 Getting More Help	<p>Family Based Treatment, Specialist Family Therapy for Anorexia / Bulimia Nervosa, Adolescent Focused Therapy , CBT , Physical Monitoring, Community Re-feeding</p>	<p>✓ CAMHS Eating Disorder Service</p> <p>✓ HOH would write to GP if required</p> <p>✓ HOH telephone parents</p> <p>✓ HOH complete referral to Emerge or CAMHS</p>
Eating Disorders	Students with a diagnosed eating disorder and receiving intervention from services, they may be admitted to hospital	Level 4 Getting Risk Support		<p>✓ HOH to liaise with hospital team how best to provide education support.</p>

Complex Behavioural Problems / Emotional Dysregulation	<p>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</p>	Getting Risk Support	<p>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.</p>	<p>All Services / Providers Share Responsibility for getting a Child or Young Person Risk Support</p> <p>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.</p> <p>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.</p>
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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.
- 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** : 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/> [Tel: 0161 832 0170]
 - **Manchester Eclipse**: Drug & Alcohol Misuse Counselling Service <https://www.changegrowlive.org/eclipse-manchester> Tel: 0161 273 6686

- **Salford Achieve:** Drug & Alcohol Service <https://www.gmmh.nhs.uk/achieve> Tel: 0161 358 1858
- **Manchester Primary Care Mental Health Services** <https://www.gmmh.nhs.uk/access-help> Citywide Service
- **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 212 4981
- **Manchester Early Help Hubs** Manchester earlyhelpnorth@manchester.gcsx.gov.uk 0161 234 5000
- **Salford Early Help** City Council and our partners have a multi-agency hub called **The Bridge Partnership**
www.partnersinsalford.org/sscb/contactus.htm 0161 603 4500
- **Manchester Mind / YASP** <https://www.manchestermind.org/our-services/young-people/>
- **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>
- **Salford The Emotional Health Service Directory** <http://www.partnersinsalford.org/youngemotionalhealth.htm>
- **Manchester Special Educational Needs Offer** www.manchester.gov.uk/sendlocaloffer
- **Salford Special Educational Needs Offer** www.salford.gov.uk/.../local-offer-for-children-and-young-people-with-sen