



Safeguarding Policy

2023- 2024

CONTENTS

1. Purpose and aims	4
2. Our ethos	4
3. Roles and responsibilities	5
4. Training and induction	7
5. Procedures for managing concerns	9
6. Records and information sharing	25
7. Working with parents and carers	25
8. Child protection conferences	26
9. Safer recruitment.....	27
10. Safer working practice.....	27
11. Managing allegations against staff and volunteers	28
12. Relevant policies	31
13. The Human Rights Act 1998	31
14. Equality Act 2010	32
15. Statutory framework	33
Appendix A: Suspect child at risk action to take.....	34
Appendix B: Safeguarding induction sheet	35
Appendix C: Vulnerability	36
Appendix D: Child Exploitation	37
Appendix D1 – Child Criminal Exploitation.....	37
Appendix D2 - Child Sexual Exploitation.....	37
Appendix D3: County Lines	38
Appendix E: So-called “honour-based abuse”	39
Appendix E1: Female Genital Mutilation (FGM).....	39
Appendix E2: Forced marriage	40
Appendix G: Private fostering	44
Appendix H: Children in missing education / absent from education.....	45
Appendix I: Child-on-child abuse	46
Appendix J: Child-on-child sexual violence and sexual harassment	48
Appendix K: Trafficking and modern slavery.....	56
Appendix L: Domestic abuse	58
Appendix M: Homelessness	60
Appendix N: Self Harm	61
Appendix O: Serious Violence	62
Appendix P: Key safeguarding contacts	63
Appendix Q: Safeguarding incident cause for concern recording sheet	64

Appendix R: Notification of suspected/admitted/known abuse of child(ren) to Social Services	66
Appendix S: Body map - to be used with Lilac form if required	68
Appendix T: CPOMs recording template.....	69
Appendix U – Mental Health	70

1. Purpose and aims

- 1.1 Denton Community College is committed to safeguarding and promoting the welfare of all its students. The purpose of Denton Community College's Safeguarding Policy is to ensure every child who is a registered student at the college is safe and protected from harm. This means the college will always work to:
 - protect children and young people at the college from maltreatment;
 - prevent impairment of children's and young people's mental and physical health or development;
 - ensure that children and young people at the college grow up in circumstances consistent with the provision of safe and effective care;
 - undertake that role so as to enable children and young people at the college to have the best outcomes.
- 1.2 This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and the legal responsibility to safeguard and promote the welfare of all children at the college. This policy makes it clear that safeguarding is everyone's responsibility.
- 1.3 The college fully recognises the contribution it can make to protect children from harm and aims to support and promote the welfare of all children who are registered students at the college. The elements of this policy are prevention, protection and support.
- 1.4 The college recognises that its safeguarding responsibilities are clearly linked to its responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from the college or who go missing from education, particularly on repeat occasions. The attendance lead (who is also the designated safeguarding lead) will at the weekly inclusion meeting discuss all persistently absent students, and those who go missing, to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.
- 1.5 This policy applies to all students, staff, parents, volunteers and visitors.
- 1.6 Prior to implementing this policy the college has considered a range of factors to help identify and focus on the key issues for the college and community and has reviewed referrals, considered local context and local issues as well as discussed as a leadership team and with the Interim Executive Board (I.E.B.) what the key priorities are.

2. Our ethos

- 2.1 The child's welfare is of paramount importance. Denton Community College will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Children at the college will be able to talk freely to any member of staff if they are worried or concerned about something.
- 2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. The college recognises that staff play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

- 2.3 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. Staff will not make promises to any child and will not keep secrets. The adult will make it clear to the child what they will have to do with any information they have chosen to disclose.
- 2.4 Throughout the curriculum the college will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage children to develop essential life skills including the promotion of mental health and well-being. These skills are predominately taught and delivered through but not exclusive to the Life Skills curriculum.
- 2.5 At all times the college will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and Local Safeguarding Partners Procedures.

3. Roles and responsibilities

- 3.1 It is the responsibility of every member of staff, volunteer and regular visitor to the college to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the students at the college. This includes the responsibility to provide a safe environment in which children can learn.
- 3.2 The members of the I.E.B. and the Headteacher are accountable for ensuring the effectiveness of this policy and compliance with it.
- 3.3 The I.E.B. will ensure that:
 - the safeguarding policy is in place and is reviewed annually, is available publicly via the college website and has been written in line with local authority guidance and the requirements of the safeguarding partners' policies and procedures;
 - the college contributes to inter-agency working in line with Working Together to Safeguard Children (2018);
 - a senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained to deal with any issues in the absence of the designated safeguarding lead (DSL). There will always be cover for this role;
 - all staff receive induction in college safeguarding on appointment and are provided with a copy of this policy and the staff code of conduct;
 - all staff, including members of the I.E.B. undertake appropriate child protection training that is updated regularly and, at least annually;
 - procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
 - safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education' DfE (2023);
 - they oversee that any weakness in regard to safeguarding arrangements are remedied immediately once they are brought to attention.
- 3.4 The I.E.B. will receive an annual safeguarding report from the DSL that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the college. It will also record a summary of all safeguarding activity and will inform the I.E.B. how the college meets its statutory requirements. The I.E.B. will also undertake a range of 'safeguarding visits' over the year to monitor compliance within the safeguarding agenda.

3.5 At Denton Community College, the Headteacher is responsible for:

- appointing a member of the senior leadership team (with qualified teacher status) to be the designated safeguarding lead (DSL);
- identifying alternative members of staff to act as the designated safeguarding lead (DSL) in his/her absence to ensure there is always cover for the role;
- ensuring that the policies and procedures are noted by the I.E.B. particularly concerning referrals of cases of suspected abuse and neglect, and are followed by all staff;
- ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- liaising with the local authority designated officer (LADO) in the event of an allegation of abuse being made against a member of staff.
- ensuring that the college undertakes all safeguarding practices and procedures required by the trust or the local authority.
- ensuring that the half-termly safeguarding check is undertaken.
- ensuring that a suitable programme of staff CPD is pulled together and delivered to staff ensuring that contextualised safeguarding risks are covered.

3.6 The Designated Safeguarding Lead:

- The Designated Safeguarding Lead (DSL) is a senior member of staff from the leadership team (with qualified teacher status) who takes lead responsibility for safeguarding and child protection within the college. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of 'Keeping Children Safe in Education' DfE (2023).
- The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in a timely fashion in CPOMs. If this resource is not readily available at the time, then a paper record (on a lilac form) should be made and handed to the DSL and then scanned into CPOMS as soon as is practical.
- During term time, the designated safeguarding lead and or a deputy will always be available (during college hours) for staff in the college to discuss any safeguarding concerns. If, in exceptional circumstances, a DSL is not available on the college site in person, they will be available via telephone or other means of communication.
- The DSL will manage referrals and will; refer cases of suspected abuse to children's social care, refer cases to the Channel programme if there is a radicalisation concern, to refer relevant cases to the disclosure and barring service, and to the Police where a crime may have been committed.
- The DSL will oversee written records in CPOMS, including child protection files, ensuring that they are kept confidential and are stored securely.
- The DSL is responsible for ensuring that all staff members and volunteers are aware of the policy and the procedures they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction.
- The DSL will liaise with safeguarding partners and other agencies where necessary.
- Through regular training, knowledge and experience the DSL will be equipped to attend and contribute to child protection case conferences, strategy discussions and other interagency meetings.
- The DSL is responsible for delivering the first line of induction training within the college.

- The DSL will help promote education outcomes by sharing information about the issues that children, including children with a social worker, are experiencing, or have experienced, with the teacher and leadership staff.
- The DSL will understand the filtering and monitoring systems and processes in place, as part of lead responsibility for online safety.

4. Training and induction

- 4.1 When new staff join the college, they will be informed of the safeguarding arrangements in place during their initial induction process. They will be given a copy of the college's safeguarding policy along with the staff code of conduct, Part One of 'Keeping Children Safe in Education' DfE (2023); and informed who the designated safeguarding lead (DSL) and deputy DSLs are. All staff are expected to read these key documents and fully understand their responsibility. They will also be informed of the college's recording and reporting procedures.
- 4.2 Every new member of staff or volunteer will receive safeguarding training as part of their induction, prior to entering the college. Within the first two weeks in post, new members of staff and volunteers are provided with accredited safeguarding training, which includes information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to accurately record concerns/information and the role of the designated safeguarding lead (DSL). The induction period will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children. The induction will also cover what constitutes a low-level concern and how these can be reported. Staff will also explore how the college's monitoring and filtering systems operate to safeguard students from being exposed to inappropriate harmful material through the internet.
- 4.3 In addition to the safeguarding induction, the college will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of 'Keeping Children Safe in Education' DfE (2023); In order to achieve this, the college will ensure that:
 - all members of staff will undertake appropriate safeguarding training on an annual basis;
 - the college will evaluate the impact of this training;
 - all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings to provide them with the relevant skills and knowledge to safeguard children effectively.
- 4.4 All regular visitors, temporary staff and volunteers to the college will be given a set of college safeguarding procedures; they will be informed who the DSL and alternative staff members are and what the recording and reporting system is.
- 4.5 The DSL, DDSLs and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend appropriate training. In addition to formal training, the DSL and DDSL's will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.
- 4.6 The I.E.B. will undertake appropriate training on induction, and then at regular intervals (annual or as required with regard to changes in KCSIE), to ensure they are able to carry out their duty to safeguard all children.
- 4.7 The college actively encourages all staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of 'Keeping Children Safe in Education' (2023) provides links to guidance on specific

safeguarding issues such as child sexual exploitation and female genital mutilation. In addition, throughout the college year the college will brief staff on key issues identified within Keeping Children Safe in Education 2023.

- 4.8 **Why safeguarding is important.** The college will ensure that children will receive the right help, at the right time to address risk and prevent issues from escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.

- Failing to act and refer early signs of abuse and neglect
- Poor record-keeping
- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information, delays in sharing
- Lack of challenge to those who appear not to be taking action

Our college policies and procedures aim to address all areas of poor practice and we ensure staff seek advice when unsure.

- 4.9 All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truancing and sexting put children in danger. All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to, bullying (including online bullying), gender-based violence/sexual assaults and sexting. Staff should be clear as to the college's policy and procedures with regards to abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information can be found on the TES and NSPCC websites. College staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- child criminal exploitation (CCE)
- bullying including online bullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith based abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- sexting
- relationship abuse
- child-on-child sexual violence and harassment
- trafficking and modern slavery

5. Procedures for managing concerns

All staff must follow the college procedures which are consistent with 'Working Together to Safeguard Children 2018' and Keeping Children Safe in Education (2023).

It is not the responsibility of the college staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students will be recorded and discussed with the designated senior person with responsibility for child protection (DSL) (or another senior member of staff in the absence of the designated person) prior to any discussion with parents.

Adults in the college are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or college staff being alerted to concerns.

Definitions

Safeguarding and promoting the welfare of children is defined 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.

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday.

- **Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.
- **Abuse** and **neglect** are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

All staff will be made aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may need help or protection.

If staff are unsure, they should always speak to the designated safeguarding lead (DSL) or deputy.

Abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL.

Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of this environment. All staff, but

especially the DSL should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.
- **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.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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 online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's physical or mental 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 and clothing, 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 caretakers);
- ensure access to appropriate medical care or treatment;
- it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to children's experiences of significant harm beyond their family and home. Safeguarding incidents and/or behaviours can be associated with factors outside of the college and can occur between children outside the college. Staff should be considering the context within such incidents and/or behaviours. This will be done through assessing the wider environmental factors that are present in a child's life that are a threat to their safety and welfare.

Geographical factors	College Response
We have a close proximity to Audenshaw reservoir	All classes during the academic year (more so in the Summer term) undertake water safety workshops produced by the fire service to teach about the dangers of the sea and tides.
Social and economic factors	College Response
<ul style="list-style-type: none"> • Crown Point Shopping Centre and Russell Scott Primary School are directly at the back of college. Students access these when leaving the college site 	<ul style="list-style-type: none"> • We teach students about personal safety and making the right decisions about their behaviour beyond college. Classes are also taught about anti-social behaviour and the consequences of criminal damage and trespassing.
Peer Group factors	College Response
<ul style="list-style-type: none"> • Students have older siblings who may be influential to younger family members 	<ul style="list-style-type: none"> • Our curriculum teaches students about the issue of 'peer pressure'. Students engage in different scenarios and are given choices to make through role play. Students are taught to be confident and assertive through our Life Skills curriculum. We also engage in a full week of 'anti-bullying' activities and we high profile this with our college community
Home factors	College Response
<ul style="list-style-type: none"> • Lots of our students are connected to the internet at home and regularly use gaming devices to engage in online games with their friends 	<ul style="list-style-type: none"> • Through our computing curriculum, students are taught about online safety. Every student has signed our 'Acceptable Use' contract. We use the SENSO system on all school owned devices. This proactive and responsive approach allows us to target certain groups of students or individuals and gives us the flexibility to respond to college incidents

Reporting

Staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play/ everyday, normal activities;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings, play or actions);
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that a child is presenting signs or symptoms of abuse or neglect;
- any significant changes in a child's presentation, including non-attendance;
- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).
- any discovery that an act of Female Genital Mutilation appears to have been carried out. Section 5B of the Female Genital Mutilation Act 2003 places a duty upon teachers to report to police where they discover (either by disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to police cases where they discover that an act of FGM appears to have been carried out.

Staff are also encouraged to actively consider children who might present as vulnerable (see appendix C).

Disclosures or information may be received from students, parents or other members of the public. The college recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that s/he can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- try to ensure that the person disclosing does not have to speak to another member of college staff;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?';
- try not to show signs of shock, horror or surprise;
- not express feelings or judgments regarding any person alleged to have harmed the child;
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person;
- reassure and support the person as far as possible;
- explain that only those who 'need to know' will be told;
- explain what will happen next and that the person will be involved as appropriate;

- record on CPOMs and with a paper record if appropriate. Recordings on CPOMs should be of a high standard and contain the right information to reflect the concerns for the student and what action has been taken to protect the student.
- 5.1 Denton Community College adheres to child protection procedures that have been agreed locally through the local safeguarding partners. Where children and families in need of support are identified, the college will carry out its responsibilities in accordance with local threshold guidance.
 - 5.2 Every member of staff including volunteers working with children at the college are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to act as outlined in this policy.
 - 5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
 - 5.4 It is not the responsibility of college staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
 - 5.5 The designated safeguarding lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the college. Any member of staff or visitor to the college who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternative designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
 - 5.6 All concerns about a child or young person should be reported without delay and recorded using the agreed procedures in CPOMS and on paper using a lilac form if appropriate.
 - 5.7 Following receipt of any information that raises concern, the DSL will consider what action to take and will seek advice from children's services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
 - 5.8 All referrals will be made in line with local children's services procedures.
 - 5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's services and/or the police immediately. Anybody can make

a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.

- 5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with children's services, or the police if:
- the situation is an emergency and the designated safeguarding lead, their alternative and the Headteacher are all unavailable;
 - they are convinced that a direct report is the only way to ensure the student's safety.
- 5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the Headteacher or the chair of the I.E.B. If any member of staff does not feel the situation has been addressed appropriately at this point, then they should contact children's services directly with their concerns.
- 5.12 The college recognises that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings (abuse). This is most likely to include, but not limited to: bullying (including online bullying), gender-based violence/sexual assaults, sexting and initiation/hazing type violence and ritual. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult, and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to child-on-child abuse.
- 5.13 The college takes the following steps to minimise the risk of child-on-child abuse:
- Ensures staff are aware of the indicators and signs of child-on-child abuse and how to identify them
 - Addresses inappropriate behaviour (even if it appears to be relatively minor)
 - Has clear robust policies for dealing with key issues of behaviour such as cyber bullying
 - Ensures staff and students are aware of the policies
 - Ensures robust supervision and awareness of potential risky areas in the college and carefully monitors any incidents in said risky areas
 - Increases supervision during key times
 - Takes steps to prevent isolation
 - Separates children if needed
 - Where risk is identified, a student risk assessment is put in place

The following systems are in place to enable children to confidently report any abuse:

- All children know who they can report to in college
- Assemblies signposting children to key actions / people

Each alleged incident will be recorded, investigated and dealt with on an individual basis based on the following principles:

- All information will be recorded in writing using the agreed procedures (CPOMS or by completing a lilac cause for concern form).

- All children involved (victim and alleged perpetrator) in the college will be spoken to separately by the DSL
- Where the incident also involves a child at a different establishment the DSL will ensure effective liaison and information sharing
- All children involved (victim and alleged perpetrator) will be appropriately supported throughout the process
- The DSL will balance the child's wishes against their duty to protect the child and other children
- The college will work with our local safeguarding partners where appropriate
- The DSL may need to go against the victim's wishes and make a referral to children's social care or the police. This will be handled sensitively, the reasons explained to the victim and appropriate support made available
- Parents will be informed of the incident and how their child will be dealt with and supported (unless this would put a child at greater risk)

Victims, perpetrators and any other children affected by child-on-child abuse will be supported in the following ways:

- Support will be tailored on a case-by-case basis
- All children involved will be supported by an allocated member of staff
- The needs and wishes of the victim will be considered, along with protecting the child.
- Wherever possible, the victim and witnesses will be able to continue their normal routine
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- All reasonable steps will be taken to protect the anonymity of any children involved in any report of sexual violence or sexual harassment
- Adequate measures will be put in place to protect the children involved and keep them safe
- A needs and risk assessment will be made and a safety plan put in place when required
- Early help, children's social care and other agencies will be asked to support where appropriate

5.14 The college recognises that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

Staff will support these children in expressing any concerns they may have and will be particularly vigilant to any signs or symptoms of abuse. The DSL and SENDCO will work together when dealing with reports of abuse involving children with SEND.

5.15 The college recognises that staff are well placed to identify concerns and take action to prevent children from becoming victims of female genital mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through safeguarding training. If staff have a concern regarding a child that might be at risk of HBA they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

- 5.16 Where FGM has taken place, there has been a mandatory reporting duty placed on teachers since 31st October 2015. 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 in England and Wales, 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. The DSL will provide guidance and support to staff on this requirement. Further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015).
- 5.17 The college recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. The college will ensure that:
- Through training, staff, volunteers and I.E.B. members will have an understanding of what radicalisation and extremism is, why staff in the college need to be vigilant and how to respond when concerns arise.
 - There are systems in place for keeping students safe from extremist material when accessing the internet in the college by using effective filtering, monitoring and usage systems and policies.
 - The DSL has received PREVENT training and will act as the point of contact within the college for any concerns relating to radicalisation and extremism.
 - The DSL will make referrals in accordance with local channel procedures and will represent the college at channel meetings as required.
 - The college will promote the spiritual, moral, social and cultural development of students through the curriculum.
 - The college has it's own PREVENT risk assessment (Appendix F).
- 5.18 The college recognises that staff are well placed to identify concerns and prevent children from becoming victims of domestic abuse. All staff should be aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a long-term impact on their health, well-being, development and ability to learn. If staff have a concern regarding a child that might be at risk of domestic abuse they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.
- 5.19 If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment and, in some cases, where education is the fundamental factor, acting as the lead practitioner. Early help assessments should be kept under review and referred to social care for assessment if the child's situation does not appear to be improving or is getting worse.

Factors that can increase vulnerability and a need for early help:

- any children with additional needs including children with special educational needs / disabled children (SEND);
- children facing housing issues such as frequent moves and homelessness;
- those living in families with chaotic lifestyles;

- families with increased stress, parental mental health and/or drug and alcohol dependency;
 - those children living elsewhere, with friends, relatives, are in care or are leaving care;
 - asylum seekers / refugees;
 - those vulnerable to discrimination on the basis of their sexuality, race, religion, ethnicity or disability;
 - children at risk from neglect or abuse including specific issues such as FGM, CSE, forced marriage, radicalisation and living in households with domestic abuse;
 - children with communication difficulties;
 - children without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.
 - A young carer
 - children showing signs of being drawn into anti-social and/or criminal behaviour / involved in gangs
 - children frequently missing from college / home / care home
 - children misusing drugs or alcohol
 - children showing signs of neglect and abuse
- 5.2 Consensual and non-consensual sharing of nude and semi-nude images and/or videos. The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.
- 5.21 The term 'nudes' is used as it is most commonly recognised by children and more appropriately covers all types of image sharing incidents.
- 5.22 The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by children who are in relationships, as well as between those who are not in a relationship. It is also possible for a child in a consensual relationship to be coerced into sharing an image with their partner.
- 5.23 Incidents may also occur where:
- Children find nudes and semi-nudes online and share them claiming to be from a peer
 - Children digitally manipulate an image of a child into an existing nude online
 - Images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- 5.24 The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Nude or semi-nude images, videos or live streams may include more than one child.
- 5.25 Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children complex. There are also a range of risks which need careful management from those working in education settings.
- 5.26 Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
- 'Sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

5.27 When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- The incident should be referred to the DSL (or deputy) as soon as possible.
- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- There will be subsequent interviews with the children involved (if appropriate).
- Parents and carers will be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm.
- A referral will be made to children's social care and/or the police immediately if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

5.28 A disclosure may not be a single event and the child may share further information at a later stage. Any direct disclosure by a child should be taken seriously. A child who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the college is a last resort, and they may have already tried to resolve the issue themselves.

5.29 The initial review meeting will consider the available evidence and aim to establish:

- Whether there is an immediate risk to any child
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the child – **in most cases, images or videos should not be viewed**
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms as this may be unknown
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment
- If there is a need to contact another education, setting or individual
- Whether to contact parents or carers of the children involved - in most cases they should be involved

5.3 An immediate referral to police and/or children's social care through the Multiagency Safeguarding Hub (MASH) or equivalent will be made if at this initial stage:

- The incident involves an adult.

- There is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
 - What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
 - The images involve sexual acts and any child in the images or videos is under 13.
 - You have reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.
- 5.31 If none of the above apply, the DSL may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.
- 5.32 The decision to respond to the incident without involving the police or children's social care will only be made in cases where the DSL is confident that they have enough information to assess the risks to any child involved and the risks can be managed within the college's support and disciplinary framework and, if appropriate, their local network of support.
- 5.33 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 (or equivalent) should conduct a further review (including an interview with any child involved) to establish the facts and assess the risks.
- 5.34 When assessing the risks and determining whether a referral is needed, the following should be also considered:
- Why was the nude or semi-nude shared? Was it consensual or was the child put under pressure or coerced?
 - Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child who produced the image?
 - Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
 - How old are any of the children involved?
 - Did the child send the nude or semi-nude to more than one person?
 - Do you have any concerns about the child's vulnerability?
 - Are there additional concerns if the parents or carers are informed?
- 5.35 The DSL will decide whether a child is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any child or young person directly. The DSL will always use their professional judgement in conjunction with that of their colleagues to assess incidents.
- 5.36 The DSL or another member of staff (who the child feels more comfortable talking to) will discuss future actions and support with the child. This discussion will consider the views of the child as well as balancing what are considered to be appropriate actions for responding to the incident.
- 5.37 The purpose of the discussion is to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.
- Find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of.
- Discuss what actions and support might be needed, including preventing further distribution.

5.38 When discussing the sharing of nudes and semi-nudes, the DSL/member of staff will:

- Reassure the child that they are not alone, and the college will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process.
- Recognise the pressures that children can be under to take part in sharing an image and, if relevant, support their parents and carers to understand the wider issues and motivations around this.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?' as this may prevent the child from talking about what has happened. For example, they will use questions such as 'describe what happened' or 'explain to me who was involved'.
- Help the child to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s).
- Discuss issues of consent and trust within healthy relationships. Explain that it is not okay for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens.
- Explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- Signpost to the IWF (Internet Watch Foundation) and [Childline's Report Remove tool](#). Report Remove helps children and young people to report an image shared online and to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.

5.39 Parents or carers will be informed and involved in the process at an early stage unless informing them will put a child or young person at risk of harm. Any decision not to inform the parents or carers will be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

5.4 Children and young people can be involved in an incident in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.

5.41 Whatever their feelings, it is important that we listen to their concerns and take them seriously. We will also help to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

5.42 In all situations, parents or carers will be:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the college.
- Given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline. counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to [NCA-CEOP](#) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

5.43 Staff and parents or carers **must not intentionally view** any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents will be based on what DSLs have been told about the content of the imagery.

5.44 The decision to view any imagery will be based on the professional judgement of the DSL. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved.

5.45 If a decision is made to view imagery, the DSL would need to be satisfied that viewing is:

- The only way to decide whether to involve other agencies because it is not possible to establish the facts from any child involved.
- Necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

5.46 If it is necessary to view the imagery, then the DSL will:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, we will contact the local police for advice and to explain the circumstances.
- Discuss the decision with the Headteacher or a member of the senior leadership team.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher or a member of the senior leadership team.

- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. This will be signed and dated.
- If any devices need to be taken and passed onto the police, the device(s) will be confiscated and the police will be called. The device will be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device will be placed in a secure place, in a locked cupboard until the police are able to come and collect it.

5.47 If nudes or semi-nudes have been viewed by a member of staff, either following a disclosure from a child or young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring college systems), the DSL will make sure that the staff member is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both children and adults and appropriate emotional support may be required.

5.48 In most cases, children and young people will be asked to delete the imagery and to confirm that they have deleted them. They will be given a deadline for deletion across all devices, online storage or social media sites. They will be reminded that possession of nudes and semi-nudes is illegal. They will be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

5.49 All incidents relating to nudes and semi-nudes being shared will be recorded using the college's procedures. Copies of imagery should not be taken.

5.5 It is important that children and young people understand the college's policy towards nudes and semi-nudes. The content of this policy and the protocols the college will follow in the event of an incident will be explored as part of teaching and learning. This will reinforce the inappropriate nature of abusive behaviours and reassure children that the college will support them if they experience difficulties or have concerns.

All students are taught in an age appropriate way about the law and the possible implications of sharing personal images as part of the Life Skills curriculum. These themes are also discussed more widely as part of the trust's approach to helping students understand acceptable behaviours within a healthy relationship, with consent as a central theme.

For more information: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

5.51 Online safety

The college has a clear online safety policy referenced to within and reflective of this safeguarding policy. It is essential that children are safeguarded from

potentially harmful and inappropriate online material. An effective whole college approach to online safety empowers college to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The I.E.B. ensures online safety is a running and interrelated theme whilst devising and implementing the college approach to safeguarding and related policies and procedures. This includes considering how online safety is reflected, as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

Online safety and the college's approach to it is reflected in the child protection policy. Considering the 4Cs (above) provides the basis of the effective online policy. The college has a clear policy on the use of mobile and smart technology. Amongst other things this reflects the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children may sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. This risk has been carefully considered and how this is managed on the premises is reflected in the college expectations for learning policy in reference to mobile and smart technology. At Denton Community College, mobile phones are not permitted to be used whilst the child is on the premises.

Filters and monitoring have been carefully considered in the college's responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn. The college is doing all it can to reasonably limit children's exposure to risks from the college's IT system. As part of this process, the college has ensured that it has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively, including how to escalate concerns when identified.

All users accessing the internet are subject to age appropriate levels of filtering. This protects students and staff against accessing inappropriate and potentially dangerous websites and applications.

The college uses SENSO to ensure maximum protection for appropriate online experiences. SENSO allows:

- Real-time monitoring – this captures user activity as it happens, sending potential risks to the monitor portal
- Online and offline monitoring – this can identify risks outside of the regular web browser e.g. work done in Word or through the 'dark web'
- Alert notifications for key staff, the alerts are ragged to help inform what level of reaction is needed to keep our students and staff safe

This means that:

- Harmful and inappropriate content is blocked without unreasonably impacting teaching and learning.

The filtering and monitoring provision is reviewed dynamically in real time to help ensure rapid and responsive safety is put in place for the students in our academies. This is officially recorded by the IT team.

For more information, the Department for Education has published filtering and monitoring standards which can be found on the government website.

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

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

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

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

5.55 Additional advice can be found at: '[NPCC- When to call the Police](#)', [Cyber security standards for schools and colleges.GOV.UK](#), [Cyber security training for school staff - NCSC.GOV.UK](#), [National Education Network](#),

<https://www.saferinternet.org.uk/advicecentre/teachers-and-school-staff/appropriate-filtering-and-monitoring>

6. Records and information sharing

- 6.1 If staff are concerned about the welfare or safety of any child at the college, they will record their concern on the college's CPOMs system (or a lilac form). Any concerns should be passed to the DSL without delay.
- 6.2 Each record should include:
- A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of each action taken, decisions reached and the outcome
 - Information from a child written verbatim
 - Date and signature / record of who completed the record

If there is any doubt about recording requirements, staff should discuss with the DSL.

- 6.3 Any information recorded will be kept on CPOMS and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within the college on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.
- 6.4 Child protection information will only be kept on CPOMS and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. All CPOMS safeguarding files will include a chronology and will record significant events in the child's life.
- 6.5 When a child leaves the college, the DSL will contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner. The college will retain evidence to demonstrate that it has acted accordingly when dealing with safeguarding matters and how the file has been transferred; this may be in the form of electronic records via CPOMS audit features or a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. Where a parent elects to remove their child from the college roll to home educate, the college will make arrangements to pass any safeguarding concerns to the local authority.
- 6.6 Note: primary academies do not need to keep copies of any records in the student record once the child leaves the school, except if there is an ongoing legal action when the student leaves the college. Custody of, and responsibility for, the records passes to the school the student transfers to.

7. Working with parents and carers

- 7.1 Denton Community College is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand statutory responsibilities in this area.
- 7.2 When new students join the college, parents and carers will be informed that there is a safeguarding policy. A copy will be provided to parents on request and is available on the college website. Parents and carers will be informed of the college's legal duty to assist colleagues in other agencies with child protection enquiries and what happens should there be cause to make a referral to children's services.

- 7.3 The college is committed to working with parents positively, openly and honestly and will ensure that all parents are treated with respect, dignity and courtesy. The college respects parents' rights to privacy and confidentiality and will not share sensitive information unless granted permission, or where it is necessary to do so in order to safeguard a child from harm.
- 7.4 The college will seek to share with parents any concerns about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the college has about a child will not prevent the DSL making a referral to children's services in those circumstances where it is appropriate to do so.
- 7.5 In order to keep children safe and provide appropriate care for them, the college requires parents to provide accurate and up to date information regarding:
- full names and contact details of all adults with whom the child normally lives;
 - full names and contact details of all persons with parental responsibility (if different from above);
 - emergency contact details (if different from above);
 - full details of any other adult authorised by the parent to collect the child from the college (if different from the above).

The college will retain this information on the student file and wherever possible will hold more than one emergency contact for each child. The college will only share information about students with adults who have parental responsibility for a student or where a parent has given permission and the college has been supplied with the adult's full details in writing.

8. Child protection conferences

- 8.1 Children's services will convene a child protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a child protection plan in order to monitor the safety of the child and the required reduction in risk.
- 8.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the college in respect of individual children. Usually the person representing the college at these meetings will be the DSL or other appropriate member of staff. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.
- 8.3 All reports for child protection conferences will be prepared in advance using the guidance and template report. The report should be quality assured by a senior member of staff. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at the college. In order to complete such reports, all relevant information will be sought from staff working with the child in the college.
- 8.4 Clearly child protection conferences can be upsetting for parents. The college recognises that staff are likely to have more contact with parents than other professionals involved. The college will work in an open and honest way with any parent whose child has been referred to children's services or whose child is subject to a child protection plan. It is the responsibility of the college to promote the protection and welfare of all children, and the aim is to achieve this in

partnership with parents. All staff should be prepared to contribute to the report writing process.

9. Safer recruitment

- 9.1 The college will ensure that at least the Headteacher and the business manager/ office manager have completed appropriate safer recruitment training. At all times the Headteacher and the business manager will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE (2023).
- 9.2 Denton Community College will use a recruitment and selection process to deter and reject unsuitable candidates. The college will require evidence of original academic certificates and will not accept testimonials but insist on taking up references prior to interview. The college will question the contents of application forms if unclear and will undertake disclosure and barring service checks and any other means of ensuring that only the most suitable people are recruited to work with children. The college will not accept a curriculum vitae on its own. A curriculum vitae will only be accepted alongside an application form. Online checks will be used as part of the due diligence on shortlisted candidates. Shortlisted candidates are notified that online searches will be done.
- 9.3 The office manager will maintain a single central register of all safer recruitment checks carried out in line with statutory requirements.
- 9.5 The college has clear protocols for visitors to ensure they are suitable and supervised as appropriate.
- 9.6 Where appropriate visitors will be expected to confirm that they have an appropriate DBS and will be asked to show photo ID on arrival. The college will keep a record of all visitors.
- 9.7 Visitors will be expected to understand that the college promotes British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. Visitors are required to uphold these during their visit.
- 9.8 Where material will be presented to students, the college will request a copy of the material to be used to assess its content and relevance to the age group.
- 9.9 If during the visit the supervising member of staff deems delivery of the content to be inappropriate, they will stop the visitor and discuss an alternative approach.
- 9.10 During the visit, visitors will be supervised by a member of college staff. Where the visitor will be working on a one-to-one basis with a child, specific safeguarding arrangements will be put in place.

10. Safer working practice

- 10.1 All adults who come into contact with children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon the college to ensure that all adults who work with or on behalf of children are competent, confident and safe to do so.
- 10.2 All adults working at or visiting the college will wear a lanyard at all times. A purple, college lanyard indicates an employee or governor who has been DBS cleared, a green lanyard indicates others who have been DBS cleared and a red lanyard indicates anyone who has not been DBS cleared. Those wearing a red lanyard must be supervised at all times.

- 10.3 All staff will be provided with a copy of the college's code of conduct at induction. They will be expected to know the college's code of conduct and the positive handling and restraint policy and to carry out their duties in accordance with this advice. There will be occasion when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for positive handling must be adhered to.
- 10.4 If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in the college, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.
- 10.5 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in 'Guidance for Safer Working Practices for Adults who Work with Children and Young People in Education Settings' (May 2019). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- 10.6 Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

11. Managing allegations against staff and volunteers

- 11.1 The college aims to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children. The college recognises that sometimes the behaviour of adults may lead to an allegation of abuse being made.
- 11.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. The college recognises that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- 11.3 All allegations will be investigated thoroughly and as a matter of urgency. They will be dealt with quickly, fairly and consistently. Protection will be provided for the child and the person subject to the allegation will be supported.
- 11.4 The college will always ensure that the procedures outlined in the local authority arrangements for managing allegations and Part 4 of '*Keeping Children Safe in Education*', DfE are adhered to and where appropriate, we will seek advice from the LADO.
- 11.5 Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in college would apply when staff (including volunteers and supply staff) have (or alleged to have):
- Behaved in a way that has harmed a child, or may have harmed a child and/or;
 - Possibly committed a criminal offence against or related to a child and/or;
 - Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 11.6 The last bullet point includes behaviour that may have happened outside of the college that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to

children with whom the person works will be undertaken. If in doubt, we will seek advice from the LADO.

- 11.7 When an allegation is made against an adult that meets the above criteria it should be reported immediately to the Headteacher who is the 'case manager'. This includes allegations made against agency and supply staff, volunteers and contractors. Should an allegation be made against the Headteacher, this will be reported to the Chair of the I.E.B.
- 11.8 In the event that neither the Headteacher nor Chair is contactable on that day, the information must be passed to and dealt with by the LADO.
- 11.9 The case manager will conduct basic enquiries in line with local procedures and KCSIE to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- 11.10 If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and / or children's social care will be convened.
- 11.11 The case manager will immediately discuss with the LADO, the nature, content and context of the allegation and agree on a course of action. Where the case manager deems there to be an immediate risk to children or a criminal offence has been committed, the police will be contacted immediately. All discussions, agreed actions and communications will be recorded in writing using the cause for concern form. The LADO should be informed within one day of any allegations made to the case manager and any actions taken.
- 11.12 If the initial discussion leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual concerned.
- 11.13 The case manager will ensure that the individual who is subject to the allegation is informed as soon as possible explaining the likely course of action guided by the LADO, and the police where necessary. The case manager will appoint a named representative to keep the person informed about the progress of the case and consider any appropriate support.
- 11.14 The case manager will ensure that parents of the child or children involved are formally told about the allegation as soon as possible and kept informed of the progress of the case, only in relation to their child. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.
- 11.15 The case manager will monitor the progress of the case to ensure that it is dealt with as quickly as possible in a thorough and fair process.
- 11.16 The case manager will carefully consider whether the circumstances warrant suspension from contact with children at the college, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the college is/are at risk of harm, or the case is so serious it might be grounds for dismissal. The case manager will seek views from HR and the LADO, as well as the police and children's social care where they have been involved. Where an individual is suspended they will be provided with a named contact in the college.
- 11.17 The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the

college ceases to use their services, or resigns or otherwise ceases to provide their services.

- 11.18 The college has a legal obligation to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person poses a risk to a child. In the case of a member of teaching staff, the case manager must consider making a referral to the TRA to consider prohibiting the individual from teaching.
- 11.19 If an allegation is made against a supply teacher, agency worker or contractor, the Headteacher will liaise closely with the agency involved. The Headteacher will ensure that any allegations are dealt with following the college's procedures and in liaison with the LADO.
- 11.20 If an allegation is made against a governor, the Headteacher will follow local authority arrangements for managing allegations, liaising with the LADO.
- 11.21 Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. For all other allegations a written record of details of the investigation and the outcome will be retained in a confidential file in the Headteacher's office. A note will be placed on the individual's personnel file to say that confidential information is stored elsewhere in the college.
- 11.22 In cases where allegations are proven to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider whether the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. A referral to children's social services may be deemed appropriate. Allegations proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references.
- 11.23 If an allegation is shown to be deliberately invented or malicious, the Headteacher will consider whether disciplinary action should be taken against a child, or whether the police should be asked to consider action against an adult.
- 11.24 The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 11.25 On conclusion of a case in which the allegation is substantiated, the case manager and the LADO will review the case to determine whether there are any improvements to be made to the college's procedures or practices to help prevent similar events in the future.
- 11.26 Allegations against a teacher who is no longer teaching should be referred to the police. Non-recent allegations of abuse should be reported to the LADO who will liaise with other agencies. Abuse can be reported no matter how long ago it happened.
- 11.27 All concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately.
- 11.28 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the criteria indicated in the allegations section above. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt.
- 11.29 An adult working in or on behalf of the college may have acted in a way that does not meet the expectation in the staff code of conduct, including conduct outside of

college and does not meet the allegations criteria or is not considered serious enough to refer to the LADO.

11.30 Such behaviour can exist on a wide spectrum; examples could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Using inappropriate language

11.31 Low-level concerns about a member of staff should be reported immediately to the Headteacher. Where the concern is about the Headteacher it should be reported to the Chair if the I.E.B. Low-level concerns about a supply teacher or contractor should be reported as above. The Headteacher will notify the employer so that any patterns of inappropriate behaviour can be identified. (Appendix V)

11.32 All low-level concerns will be recorded by the member of staff who has the concern using the cause for concern form, this is stored centrally and is in the file in the DSL's office. These records will be reviewed regularly by the Headteacher and DSL so that any patterns of inappropriate behaviour can be identified and dealt with.

11.33 **Organisation or individuals using college premises** – the college may receive an allegation relating to an incident which happened when an individual or organisation was using their college premises for the purposes of running activities for children. We must ensure appropriate safeguarding procedures are in place, including liaising with LADO.

12. Relevant policies

12.1 To underpin the values and ethos of the college and to ensure that students at the college are appropriately safeguarded the following policies are also included under the safeguarding umbrella:

- Staff Code of Conduct
- Anti-bullying Policy
- Recruitment and Selection Policy
- Whistle-blowing Policy
- Attendance Management Policy
- Online Safety including remote teaching and learning
- Health and Safety Policy
- GDPR Policy
- Supporting students With Medical Conditions
- Educational Visits Including Overnight Stays
- SRE Policy
- Managing Allegation Policy

13. The Human Rights Act 1998

Safeguarding policy and practice draws upon fundamental tenants of the Human Rights Act 1998:

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect

an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

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

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

14. Equality Act 2010

This policy has been devised in accordance with the Equality Act 2010.

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act).

According to the Equality Act, schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their students and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people. An college or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential. The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

15. Statutory framework

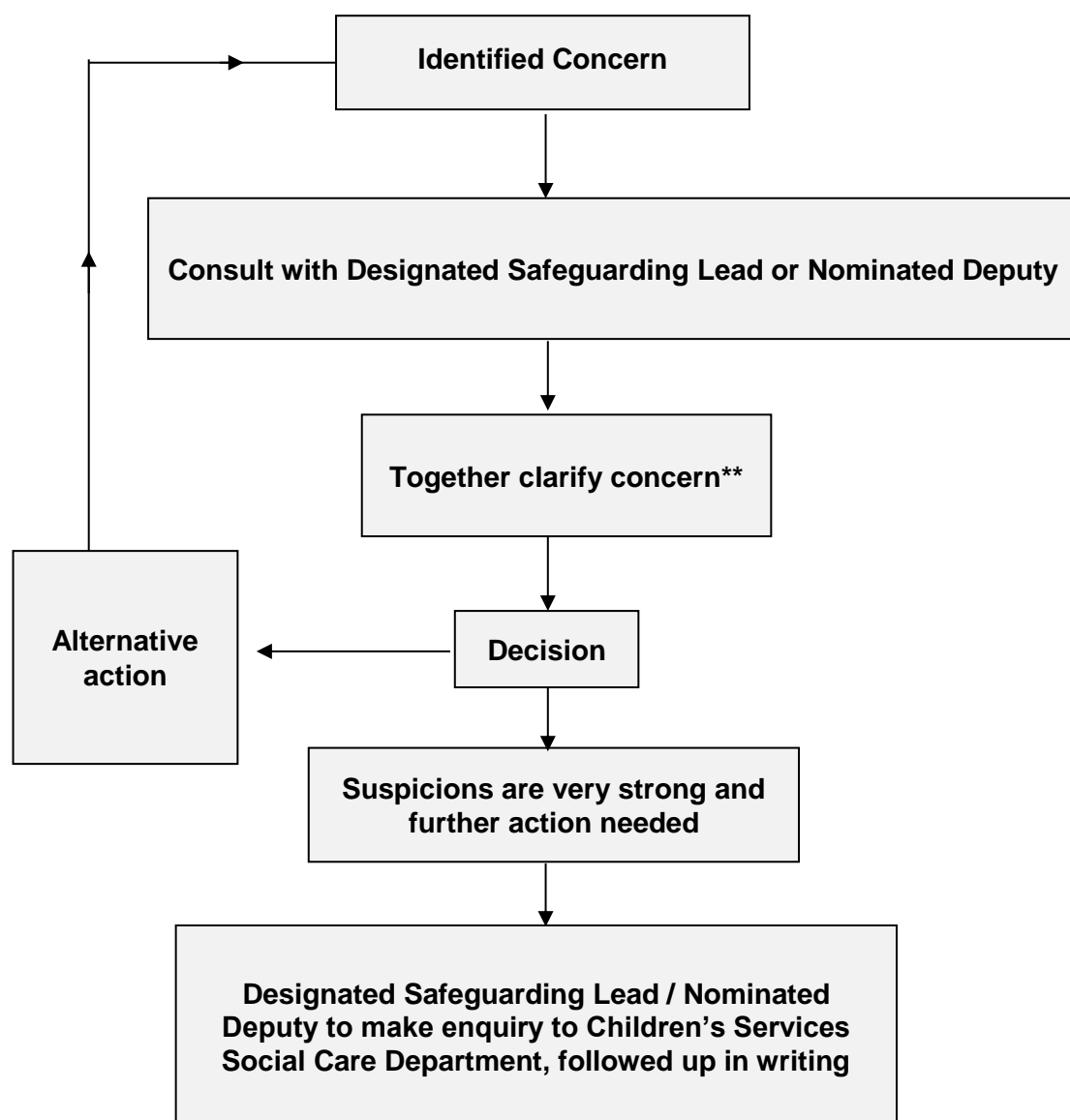
This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (updated DfE 2020);
- 'Keeping Children Safe in Education (DfE 2023);
- Local Safeguarding procedures;
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (May 2019);
- What to do if you're worried a child is being abused (DfE March 2015);
- Information Sharing: Advice for practitioners (DfE March 2015);
- The Prevent Duty 2015: Departmental advice for schools and childcare providers (revised DfE 2021);
- Mandatory Reporting of Female Genital Mutilation – procedural information (Home Office October 2015).
- The Human Rights Act 1998
- Equality Act 2010.
- Behaviour in schools Advice for headteachers and school staff (DfE 2022)
- Meeting digital and technology standards in schools and colleges (DfE 2023)
- SEND code of practice: 0 to 25 years (DfE 2014)
- Supporting pupils at school with medical conditions (DfE 2014)

Appendix A: Suspect child at risk action to take

Denton Community College

Channels of communication should be quick and clear:



****** Any member of staff who is unhappy with the joint decision made with the Designated Safeguarding Lead can consult with the Headteacher/Chair of the I.E.B. or seek advice from key staff within the Local Authority.

Appendix B: Safeguarding induction sheet

(For new or supply staff and regular visitors or volunteers)

College staff have a statutory duty to safeguard and promote the welfare of children, and at the college we take this responsibility seriously.

If you have any concerns about a child or young person in the college, you must share this information immediately with the designated safeguarding lead (DSL) or one of the alternative postholders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour; we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern. If you are unable to locate one of the designated professionals, ask a member of the college office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's Foster Carer or a volunteer should be reported immediately to the Headteacher. If an allegation is made about the Headteacher you should pass this information to the Chair of the I.E.B. Alternatively, you can contact the local authority designated officer (LADO). The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally (0800 028 0285: available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk).

The people you should talk to in college are:

Acting Headteacher	Donald Cumming
Location of office	Top corridor/front of school
Contact details	Via Lesley Pope d.cumming@dentoncommunitycollege.org.uk
Designated Safeguarding Lead (DSL):	Katherine Kilbane
Location of office:	Ground floor science/drama junction
Contact details:	k.kilbane@dentoncommunitycollege.org.uk 0161 337 3839
Alternative Designated Safeguarding Lead(s):	Candice Wilson- Year 8 Homebase James Haslam- Music (top corridor) Samantha Graham- Year 10 Homebase Steve Nixon- Year 9 Homebase James Day- Year 8 Homebase Rachel Hampson- Year 10 Homebase CP Officers: Lorna Slattery- Welfare Hub Lisa Devane- Welfare Hub
Chair of I.E.B:	Jane Acklam

Contact details:	Contact details available from Lesley Pope
------------------	--

At Denton Community College we strive to safeguard and promote the welfare of all of our children.

Appendix C: Vulnerability

Alongside the specific safeguarding issues listed below staff should consider children who may be particularly vulnerable to abuse and may require early help: Factors that can increase vulnerabilities can include any children with additional needs including;

- children with special educational needs / disabled children (SEND);
- children facing housing issues such as frequent moves and homelessness;
- those living in families with chaotic lifestyles;
- families with increased stress, parental mental health and/or drug and alcohol dependency;
- those children living elsewhere, with friends, relatives, are in care or are leaving care;
- asylum seekers / refugees;
- those vulnerable to discrimination on the basis of their sexuality, race, religion, ethnicity or disability;
- children at risk from neglect or abuse including specific issues such as FGM, CSE, forced marriage, radicalisation and living in households with domestic abuse;
- children with communication difficulties;
- children without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.

This is not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns. For more information on specific safeguarding issues please refer to Part 1 and Annex A of Keeping Children Safe in Education 2023.

Appendix D: Child Exploitation

Appendix D1 – Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see D3), forced to shoplift or pickpocket, or to threaten other young people. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss college or education or do not take part in education.

Appendix D2 - Child Sexual Exploitation

CSE is a form of child sexual abuse, it occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Links with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and

- Self-harm or significant changes in emotional well-being;
- Being seen in cars not belonging to a parent / carer / family member

Appendix D3: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

For additional information, please see <https://tce.researchinpractice.org.uk/> for Multi-agency Practice Headteachers for responding to child exploitation and extra-familial harm.

For guidance on appropriate language in relation to child exploitation please see https://www.childrenssociety.org.uk/sites/default/files/2022-01/Child_Exploitation_Appropriate_Language_Guide_2022.pdf .

Appendix E: 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;
- forced marriage;
- 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. If in any doubt, staff should speak to the Designated Safeguarding Lead (or deputy). 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.

Appendix E1: Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. There are four types of procedure:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy: partial/total removal of clitoris	Excision: partial/total removal of clitoris and labia minora	Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia	All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage;
- preserves a girl’s virginity;
- part of being a woman / rite of passage;
- upholds family ‘honour’;
- cleanses and purifies the girl;
- gives a sense of belonging to the community;
- fulfils a religious requirement;
- perpetuates a custom / tradition;
- helps girls be clean / hygienic;
- is cosmetically desirable;
- mistakenly believed to make childbirth easier.

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. FGM is **illegal** in most countries including the UK. It is also illegal for someone usually resident in the UK to assist or aid the act of FGM outside of the UK. Circumstances and occurrences that may point to FGM happening:

- child talking about getting ready for a special ceremony;
- family taking a long trip abroad;
- child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- knowledge that the child's sibling has undergone FGM;
- child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- prolonged absence from the college and other activities;
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued;
- bladder or menstrual problems;
- finding it difficult to sit still and looking uncomfortable;
- complaining about pain between the legs;
- mentioning something somebody did to them that they are not allowed to talk about;
- secretive behaviour, including isolating themselves from the group;
- reluctance to take part in physical activity;
- repeated urinal tract infection;
- disclosure.

Girls from the following communities are identified as being more at risk: Somali, Kenyan, Ethiopian, Sierra Leonean, Sudanese, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish, Indonesian.

The 'One Chance' rule:

As with forced marriage there is the 'One Chance' rule. It is essential that academies take action **without delay**. As KCSIE now states: *'Under section 5B of the Female Genital Mutilation Act 2003 (as inserted by sect 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions'*. Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police even if they have reason to believe that another teacher has already reported the case.

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, **the teacher must** report this to the police.

Further information:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Appendix E2: Forced marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

Signs and symptoms may include:

- students may appear anxious, depressed and emotionally withdrawn with low self-esteem;
- they may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia;
- sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol;
- often student's symptoms can be exacerbated in the periods leading up to the holiday season;
- students may present with a sudden decline in their performance, aspirations or motivation;
- they may be subject to excessive restrictions and control at home;
- some students may not be allowed to attend any extra-curricular or after-college activities;
- girls and young women may be accompanied to and from the college, and even during lunch breaks;
- some students may stop attending the college;
- their homework is incomplete or appears rushed; this may be the result of being actively discouraged from doing it by family members;
- students may do their homework late at night, which frequently shows in the college because they are lethargic, unable to concentrate and have a general appearance of tiredness;
- professionals being told that the student is out of the country;
- there are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends;
- conflict between the student and their parents about whether the student will be allowed to continue their education;
- family history of older siblings leaving education early and marrying early.

How education professionals can help:

- signposting, where appropriate, to forced marriage materials or where further support and advice can be accessed;
- displaying relevant information e.g. details of the NSPCC Helpline, Childline, and appropriate local and national support groups on forced marriage;
- ensuring that a private telephone is made available should students need to seek advice discreetly;
- educating teachers, lecturers and other staff about the issues surrounding forced marriage and the presenting symptoms – appropriate training should be included in continuing professional development (CPD);
- referring students to an education welfare officer, pastoral tutor, learning mentor or college counsellor as appropriate;
- encouraging young people to access appropriate advice, information and support.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For more information:

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Appendix F: Preventing Radicalisation

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

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

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

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

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

College Leaders must:

- establish or use existing mechanisms for understanding the risk of extremism;
- ensure staff understand the risk and build capabilities to deal with it;
- communicate and promote the importance of the duty;
- ensure staff implement the duty effectively.

Other duties on academies include:

- effective partnership working with other local agencies, eg. safeguarding partners (former LSCB) police, health, etc.;
- information sharing;
- maintaining appropriate records;
- assessing local risk of extremism (including far right extremism);
- demonstrating they are protecting children;
- developing clear protocols for visiting speakers;
- safeguarding policies that take account of local safeguarding partners' policies and procedures;
- training staff to give them knowledge and confidence;
- ensuring there is robust ICT protocols that filter out extremist materials;
- college buildings must not be used to give a platform to extremists.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into radicalisation.

Prevent referrals may be passed to a multi-agency channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. A representative from the college or college may be asked to attend the channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Understanding and recognising risks and vulnerabilities of radicalisation

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet and social media. This can put a young person at risk of being drawn into criminal activity and has the potential to cause **significant harm**.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Possible indicators include:

- use of inappropriate language;
- possession of violent extremist literature;
- behavioural change;
- advocating violent actions and means;
- association with known extremists;
- seeking to recruit others to an extremist ideology.

PREVENT Risk Assessments for Primary and Secondary academies can be found in the NET Resources

<https://sites.google.com/northerneducationtrust.org/pri-resources/safeguarding/net-dsl-information/documentation>

Further information:

www.gov.uk/government/publications/prevent-duty-guidance

<https://www.gov.uk/guidance/making-a-referral-to-prevent>

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>

Appendix G: Private fostering

Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- children who need alternative care because of parental illness;
- children whose parents cannot care for them because their work or study involves long or antisocial hours;
- children sent from abroad to stay with another family, usually to improve their educational opportunities;
- unaccompanied asylum seeking and refugee children;
- teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- children staying with families while attending an college away from their home area.

There is a mandatory duty on the college to inform the local authority of a private Fostering arrangement. The local authority has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Further information:

www.gov.uk/government/publications/children-act-1989-private-fostering

Appendix H: Children in missing education / absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including abuse or neglect, sexual exploitation, criminal exploitation, county lines, mental health concerns, FGM, forced marriage and travelling to conflict zones. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future. It is important to report concerns when they first emerge, but to also work with the local authority and social care for children who are already known to services (e.g. CIN, children supported by a CP plan, and children who are looked after), being absent from education could increase known safeguarding risks for the child.

The college must notify the local authority of any student who fails to attend the college regularly after making reasonable enquiries, or has been absent without the college's permission for a continuous period of 10 days or more. The college must also notify the local authority of any student who is to be deleted from the admission register because s/he:

- has been taken out of the college by their parents and is being educated outside the college system (e.g. home education);
- has ceased to attend the college and no longer lives within a reasonable distance of the college at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the college of the change);
- displaced as a result of a crisis e.g. domestic violence or homelessness;
- has been certified by the nominated first aider or member of staff as unlikely to be in a fit state of health to attend the college before ceasing to be of compulsory college age, and neither s/he nor his/her parent has indicated the intention to continue to attend the college after ceasing to be of compulsory college age;
- is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe s/he will return to the college at the end of that period;
- has been permanently excluded and all due processes have been completed.

The college will demonstrate that it has taken reasonable steps to ascertain the whereabouts of children that would be considered 'missing'. College absences may be a sign of abuse.

Persistent absence is where students are identified as persistent absentees if they miss 10% or more of their possible sessions. Through our college attendance procedures and our inclusion meetings, we recognise the importance of identifying and supporting students who are absent to prevent them from becoming a child missing education in the future.

A Child Missing in Education (CME) is defined by the Department for Education (DfE) as "a child of compulsory school age who is not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who has been out of any educational provision for a substantial period of time (usually four weeks or more)".

Further information:

Children Missing Education: statutory guidance for local authorities – September 2016

www.gov.uk/government/publications/children-missing-education

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

<https://www.gov.uk/government/publications/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_school_attendance.pdf

Appendix I: Child-on-child abuse

Denton Community College recognises that children are vulnerable to and capable of abusing their peers both online and offline. Such abuse is taken as seriously as abuse perpetrated by an adult. Child-on-child abuse will not be tolerated or passed off as part of “banter” or “growing up”.

In cases where child-on-child abuse is identified, the college will follow child protection procedures, recognising that both the victim and perpetrator will require support.

The college recognises that child-on-child abuse can manifest itself in many ways such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

There are a number of factors that make children more vulnerable to child-on-child abuse: experience of abuse within their family, living with domestic violence, young people in care, children who go missing, children with additional needs (SEN and/or disabilities).

Research tells us girls are more frequently identified as being abused by their peers, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs.

There is an increasing evidence base emerging about the sexual exploitation of boys (both by adults and peers). The college recognises that both boys and girls experience child-on-child abuse but they do so in gendered ways.

A difficult feature of child-on-child abuse is that the perpetrators could be victims themselves and possibly are being abused by their parents or caregivers.

Relationship abuse is unacceptable behaviour between two people. You don’t have to be an ‘official couple’ to experience abuse and it doesn’t matter what your relationship looks like; gay, straight or bi, or whether you’re a girl, boy or have another gender identity.

Further information:

www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/ details some of the complicated reasons why children abuse other children:

- the child may have been emotionally, physically, or sexually abused themselves;
- the child may have witnessed physical or emotional violence;
- the child may have viewed sexually explicit movies, video games or other materials;
- the child may have just acted impulsively without meaning to harm anyone;
- peer abuse must be taken extremely seriously for these reasons; It could be an indicator of even worse abuse going on in the child's home.

Preventing Child-on-child Abuse:

The prevention of child-on-child abuse is of paramount importance to ensure there is a safe environment for our students to learn and grow. Within our college we:

- ensure staff understand that children can abuse other children
- have clear robust policies on dealing with key issues such as online bullying;
- ensure staff and students are aware of the policies (e.g. Anti-bullying Policy and the Expectations for Learning Policy);
- ensure students know their concerns will be treated seriously;
- identify any blind spots within the college;
- supervise and be aware of potential risky areas, tents in play areas etc.;
- pay attention and monitor children who may be hiding in areas out of view;
- take steps to prevent isolation;
- separate children if needed;
- increase supervision during key times;
- if you suspect a child is abusing another, you must inform the DSL, the concerns must be logged accurately where appropriate on CPOMs following the CPOMs guidance / the expectations for learning tracker;
- where risk is identified have a student safety plan in place;
- we recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported

Appendix J: Child-on-child sexual violence and sexual harassment

The college is bound by the statutory guidance contained in part five of KCSIE as to how it should respond to all signs, reports and concerns of sexual violence and sexual harassment, including those that have happened outside of the college premises, and/or online. All staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering abuse.

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. All staff must be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse, and that, even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college or college. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Sexual violence

All staff should be aware of the signs of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of the college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹³² 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. (NOTE- All staff should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without

consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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

- a child under the age of 13 can never consent to any sexual activity, therefore all incidences of sexual behaviour involving children under 13 should be considered as a potential criminal or child protection matter.
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the college. When we reference sexual harassment, we do so in the context of 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 sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. *It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the college response. If in any doubt, they should seek expert advice. If this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.*
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage (see page 63 for Hackett's continuum). A useful umbrella term is

“harmful sexual behaviour” (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously. The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This should form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole college or college approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Preventing abuse.

Effective safeguarding practice is demonstrated when the college is clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues in order to prepare the college’s policies (especially the child protection policy) and responses, and
- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required

Responding to reports of sexual violence and sexual harassment.

Systems are in place (well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously. The college ensures that it contributes to multi-agency working in line with statutory guidance ‘Working Together to Safeguard Children’ (and as summarised in Part 2 of this guidance). This policy does not attempt to provide (nor would it be possible to provide) detailed guidance on what to do in any or every case. The policy provides effective safeguarding practice and principles for schools and colleges to consider in their decision-making process. Ultimately, any decisions are for the college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children’s social care and the police as required. KCSIE provides guidance and case studies which the college council and trustees ensure are used as a framework for response. These are not intended to offer a step-by-step guide, but to provide an indication of some of the various options that are available to respond to reports of

sexual violence and sexual harassment. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) should lead the college or college response and should be aware of the local process for referrals to children's social care and making referrals to the police (also see the section "reporting to the police" on page 119 for further information).

Online:

The college recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

- The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for college and college staff with regard to online safety issues
- Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)
- Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online
- UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).
- National Crime Agency's CEOP Education Programme provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse
- LGFL 'Undressed' provides advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

College has appropriate filtering and monitoring on college devices and college networks through our use of SENSO firewall software.

The immediate response to a report:

It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of college or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. The initial response by college to a report from a child is incredibly important. How the college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. All staff should be trained to manage a report.

Reports should be managed with the following safeguarding practice in mind:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
- careful management and handling of reports that include an online element. Including being aware of searching screening and confiscation advice (for academies) and UKCIS sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection 111
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to • recognising that a child is likely to disclose to someone they trust: this could be anyone on the college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Confidentiality.

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The college should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation. The victim may ask the college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered. Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC:

Information sharing and confidentiality for practitioners.

Anonymity: Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses. As a matter of effective safeguarding practice, the college should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. The college should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Risk assessing and safety planning

- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:
 - the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Safety plans should be recorded (paper or electronic) and should be kept under review. At all times, the college should be actively considering the risks posed to all their students and put adequate measures in place to protect.

It is not the role of the college to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process.

The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments

should be used to inform the college approach to supporting and protecting their students and students and updating their own risk assessment.

Action following a report of sexual violence and/or sexual harassment

What to consider

All staff should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the college/college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the college. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the college's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or college or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

For further information on responding to children who display sexualised behaviour - <https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>
<https://www.csacentre.org.uk/documents/safety-planning-in-education/>

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.

Need advice?

Contact our helpline for advice and support:

- Call **0808 800 5000**
- Email help@nspcc.org.uk
- Visit nspcc.org.uk/helpline

Childline

For children who need further support our free, confidential helpline is available 24/7:

- Call **0800 1111**
- Visit childline.org.uk

Developmentally typical	Hackett Continuum				Harmful
Normal	Inappropriate	Problematic	Abusive	Violent	
<ul style="list-style-type: none"> • Developmentally expected and socially acceptable behaviour • Consensual, mutual and reciprocal • Decision making is shared 	<ul style="list-style-type: none"> • Single instances of developmentally inappropriate sexual behaviour • Behaviour that may be socially acceptable within a peer group but not in wider society • May involve an inappropriate context for behaviour that would otherwise be considered normal 	<ul style="list-style-type: none"> • Developmentally unusual and socially unexpected behaviour • May be compulsive • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation 	<ul style="list-style-type: none"> • Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely) 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism 	
<h3>How to respond</h3> <ul style="list-style-type: none"> • Although green behaviours are not concerning, they still require a response • Listen to what children and young people have to say and respond calmly and non-judgementally • Talk to parents about developmentally typical sexualised behaviours • Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse • Signpost helpful resources like our "Talk PANTS" activity pack: nspcc.org.uk/pants • Make sure young people know how to behave responsibly and safely 	<h3>How to respond</h3> <ul style="list-style-type: none"> • Amber behaviours should not be ignored • Listen to what children and young people have to say and respond calmly and non-judgementally • Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support • Consider whether the child or young person needs therapeutic support and make referrals as appropriate 		<h3>How to respond</h3> <ul style="list-style-type: none"> • Red behaviours indicate a need for immediate intervention and action • If a child is in immediate danger, call the police on 999 • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support • Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures 		

NSPCC

'Learning'

In partnership with




Supported by Health Education England

©National Society for the Prevention of Cruelty to Children (NSPCC) 2021. Registered charity England and Wales 216401. Scotland SC037117. Jersey 384 J20181279.

Hackett's continuum presents sexualised behaviour as a range from 'normal' to 'inappropriate', 'problematic', 'abusive' and 'violent' (Hackett, 2010).

Appendix K: Trafficking and modern slavery

“Trafficking of persons” means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

“Child” shall mean any person under eighteen years of age.

The Palermo Protocol establishes children as a special case. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is **not considered possible for children to give informed consent**. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Why are children trafficked?

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as ‘organ donation or ‘harvesting’, all agencies should remain vigilant.

Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked.

The factors listed below are by no means a comprehensive list:

- poverty
- lack of education
- discrimination
- cultural attitudes
- grooming
- dysfunctional families
- political conflict and economic transition and
- inadequate local laws and regulations

Potential indicators:

Once in the UK the child:

- receives unexplained/unidentified phone calls whilst in placement/temporary accommodation;
- shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy;
- has a history with missing links and unexplained moves;
- has gone missing from Local Authority care;
- is required to earn a minimum amount of money every day;
- works in various locations;
- has limited freedom of movement;
- appears to be missing for periods of time;
- is known to beg for money;
- performs excessive housework chores and rarely leaves the residence;

- is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address;
- has not been registered with or attended a GP practice;
- has not been enrolled in the college;
- has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person;
- is excessively afraid of being deported.

Further information:

www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance

Appendix L: Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.(KCSIE)

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

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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Signs, indications and effects:

It is often difficult to tell if domestic abuse is happening because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may:

- become aggressive;
- display anti-social behaviour;
- suffer depression or anxiety;
- not do as well in the college, due to difficulties at home or disruption of moving to as well as from refuges.

Other signs and symptoms may include:

Becoming withdrawn, suddenly behaving differently, being clingy, problems sleeping, eating disorders, wetting the bed, soiling clothes, taking risk, being absent from the college, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts of suicide (see www.nspcc.org.uk).

We are an 'Operation Encompass' college

Operation Encompass operates in the majority of police forces across England. It helps police and schools 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 (usually the designated safeguarding lead) in college before the child or children arrive

at college the following day. This ensures that the college has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Appendix M: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (KCSIE)

Types of homelessness and bad housing

- living in temporary or emergency accommodation (such as B&Bs and hostels);
- hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions);
- couch / sofa surfing, moving from one place to another;
- being at risk of abuse or violence leading to homelessness or overcrowding.

Impact of homelessness

- practical issues include loss of possessions required for the college e.g. books, uniform etc.;
- maybe unkempt due to lack of laundry services;
- physically exhausted due to sleeping arrangements;
- emotionally exhausted due to increased stress;
- signs of severe emotional trauma leading to emotional stress, anxiety;
- changes in behaviour or/and problematic behaviour;
- student may become withdrawn or aggressive;
- if placed out of area they may arrive late or miss college due to transport / financial difficulties;
- the student's ability to maintain relationships may be affected;
- may 'stand out' more to peers, leading to feelings of alienation and self-consciousness;
- impact on attainment levels and ability to learn.

Some children may not display any symptoms / behaviours that may be a cause for concern. 'What is life like at home?' – is a good question to use regularly with all children.

Appendix N: Self Harm

Self-harm refers to a person's harming their own body on purpose. About 1 in 100 people hurts himself or herself in this way. More females hurt themselves than males. A person who self-harms usually does not mean to kill himself or herself, however they are at higher risk of attempting suicide if they do not get help.

Self-harm tends to begin in teen or early adult years. Some people may engage in self-harm a few times and then stop. Others engage in it more often and have trouble stopping.

Examples of self-harm include:

- Cutting yourself (such as using a razor blade, knife, or other sharp object to cut the skin)
- Punching yourself or punching things (like a wall)
- Burning yourself with cigarettes, matches, or candles
- Pulling out your hair
- Poking objects through body openings
- Breaking your bones or bruising yourself

Many people cut themselves because it gives them a sense of relief. Some people use cutting as a means to cope with a problem. Some teens say that when they hurt themselves, they are trying to stop feeling lonely, angry, or hopeless.

If there is a concern about a student's safety due to self-harm, **the DSL must be informed and a safety plan should be put in place** to support the student to safely engage in their college life and education by increasing safety and reducing any barriers to learning in accordance with the expectation for learning policy.

Further information:

<https://www.mentalhealth.gov/what-to-look-for/mood-disorders/self-harm>

Appendix O: Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from college
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- Being male
- Having been frequently absent or permanently excluded from college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Appendix P: Key safeguarding contacts

Social Care (Tameside)	
Multi Agency Safeguarding Hub 0161 342 4101	Out of hours Emergency Duty Team 0161 342 2222
Children's Area Social Work Team Acre Street, Denton M34 2BW 0161 342 4477	Early Help Access Point (EHAP) 0161 342 4260

LADO (Tameside)	Telephone Number
Tania Brown	0161 342 4398 tania.brown@tameside.gov.uk

Police	Telephone Number
Police www.gmp.police.uk (online reporting)	101 999 in an emergency
Prevent: prevent@tameside.gov.uk gmchannel@manchester.gov.uk channel.project@gmp.police.uk	0161 8566345
Anti -terrorist hotline	0800 789321

Education Department (Tameside)	Telephone Number
Education Welfare Education.Welfare@tameside.gov.uk cme@tameside.gov.uk	0161 342 2112

Other	Telephone Number
NSPCC Whistleblowing Helpline	0800 028 0285
Childline	0800 1111
Disclosure and Barring Service Address: PO Box 3961, Royal Wootton Bassett, SN4 4HF customerservices@db.s.gov	03000 200190
Teacher Regulation Agency (TRA) Address: Cheylesmore House, 5 Quinton Rd, Coventry CV1 2WT misconduct.teacher@education.gov.uk	0207 593 5393
OFSTED	0300 1233 155

Appendix Q: Safeguarding incident cause for concern recording sheet

MUST BE PRINTED ON LILAC PAPER

Once completed this form must be passed to the designated person with responsibility for child protection or the Headteacher. The completed form must be scanned into CPOMS.

Full name of young person:	
Date of birth:	
Year and tutor group/VMG:	
Home address:	
Date of incident (day/month/year):	
Time of incident (24-hour clock):	
Location of incident:	
Observed by (full name and position):	
Detailed observation:	
Concerns:	
Have you spoken to the young person?	

What was said (please record in the young person's own words)?	
Have you spoken to parents/carers?	
What was said (include full name of parent/carer spoken to)?	
Referred to:	
Your name:	
Your position:	
Signed:	
Date and time of record:	

Appendix R: Notification of suspected/admitted/known abuse of child(ren) to Social Services

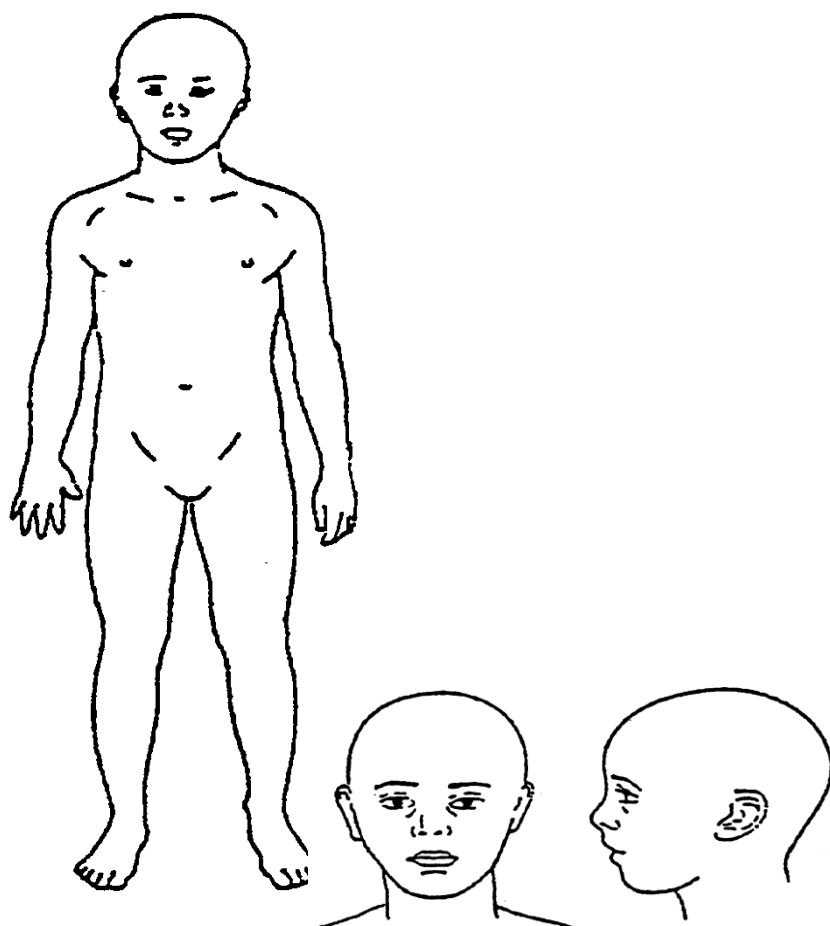
This form should be completed by the designated person with responsibility for child protection on the basis of information readily available and should not be delayed on the basis of incomplete information. The completed form must be scanned into CPOMS.

Child(ren)'s surname:	
Child(ren)'s forename(s):	
Child(ren)'s date of birth:	
Other name(s) by which the child(ren) may be known:	
Present location:	
Home address of child:	
Parent/guardian's surname:	
Parent/guardian's forenames:	
Parent/guardian's address:	
Parent/guardian's telephone number:	
Parental responsibility?	
If not, insert the names and addresses of those with parental responsibility:	
Surname/forenames, date of birth or age of any siblings/co-resident children:	
GP's name:	
GP's address:	

GP's telephone number:	
Professional agencies known to be involved with the family (contact name, address and telephone number):	
Reason for referral:	
Action already taken:	
Referred in writing/by telephone to:	
Date:	
Parents advised of referral?	
Child/young person advised of referral?	
Name of Designated Person:	
Signature:	
Date:	

Appendix S: Body map - to be used with Lilac form if required

Child's full name	DOB	Date



Description of injury / additional notes:		
Professional's name	Professional's designation	Contact number

Appendix T: CPOMs recording template

CPOMS recording template

All CPOMS entries must include the following format where applicable:

- **Full name and role of those involved in the entry –**
- **Reason for entry -** (what has happened? What are we worried about? Date / time of correspondence. Which DSL did you speak to? What safety factors are already in place?)
- **Actions –** (what needs to happen? Who needs to do it? When do they need to do it? Does a safety plan need to be reviewed?)

Full CPOMS recording training can be found in NET resources -

<https://sites.google.com/northerneducationtrust.org/pri-resources/safeguarding/net-dsl-information/training>

Appendix U – Mental Health

College staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, our college staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. We can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If a child does not have a diagnosed mental health condition, you must be very careful with the language you use and **not** use the language of diagnosis. We can be clear about what we see without making a judgement of what you think that means e.g. “Dan was crying at lunch time and said he felt really sad” not “Dan looked depressed today”.

If there is a concern about a student’s safety due to their mental health concern **the DSL must be informed and a safety plan should be put in place** to support the student to safely engage in their college life and education by increasing safety and reducing any barriers to learning in accordance with the expectation for learning policy.