



CHILD PROTECTION AND SAFEGUARDING POLICY **FOR CHILDREN AND VULNERABLE ADULTS**

(Including the Prevent Strategy)

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MISSION STATEMENT

Holy Cross, founded by the Daughters of the Cross, is a Catholic Sixth Form College and University Centre, which exists to provide a high quality education within a community based on Gospel values. The College provides the opportunity for each person spiritually, morally and intellectually and welcomes students and staff of all faiths

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HOLY CROSS COLLEGE SAFEGUARDING CONTACT LIST

ROLE	NAME	CONTACT DETAILS
Principal	Ms C Vitti	0161 762 4500
Deputy Principal	Mcvs R McKelvey	0161 762 4500
Assistant Principal (Students) and DSL	Mrs S Burton	0161 762 4500
Learning Support Manager and DDSL	Mr G Barnard	0161 762 4500
Safeguarding Officer and DSL	Mrs J Ward	0161 762 4500
SPL/ DDSL	Mrs G Higham	0161 762 4500
SPL/ DDSL	Mr M Weatherall	0161 762 4500
SPL/ DDSL	Mrs J Mohammad	0161 762 4500
DDSL	Mr J Burgess- Director of the University Centre	0161 762 4500
DDSL	Mrs D Warren- Deputy Director of the University Centre	0161 762 4500
DDSL	Ms R Connett- Wellbeing Officer	0161 762 4500
DDSL	Mrs H Allemeersch- Cognitive-behavioural psychotherapist and Counselling co-ordinator	0161 762 4500
Local Authority Designated Officer (LADO)	Mr M Gay	Tel 0161 253 6168 lado@bury.gov.uk
Chair of Governors	Mrs H Stainton	0161 762 4500
Governor for Safeguarding		0161 762 4500
Channel Helpline	https://www.bury.gov.uk/index.aspx?articleid=14807 Link to make a Channel referral	020 7340 7264 GMP Prevent Team 0161 856 6362
Bury Children's Social Care Services/ MASH (Multi – Agency Safeguarding Hub Team)		Immediate Danger: 0161 872 5050 Non – emergency: 0161 253 5698
Bury Early Help Team	Team around the school – social worker	0161 253 5200

SECTION 1:

AIMS AND SCOPE / STATUTORY FRAMEWORK

- 1.1. This policy recognises the legislative requirements and expectations to safeguard and promote the welfare of children outlined in DfE statutory guidance. Safeguarding is everyone's responsibility and the purpose of this policy is to provide clear guidance for the protection of children and vulnerable adults. Because of their day-to-day contact with individual children, teachers and other staff in education are particularly well placed to observe outward signs of abuse, neglect, exploitation and changes in behaviour or failure to develop including potential signs of individuals becoming drawn into terrorism.
- 1.2. The Children Act 1989 & 2004 provides the legal framework for the safeguarding children in the UK. Under the Children Act a child is defined as any person under 18 years of age. There is a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident and safe to do so.
- 1.3. Students are classed as children up and until their 18th birthday and all policy and procedures in this document will apply. The situation is more complex for teenage students that have reached the age of 18 whilst still attending the college. For this category, the college will apply the principles of safeguarding children where possible; the only exception to this being: if such a student meets the criteria of being a vulnerable adult, then referral would be to adult services, including the police, rather than children's services
- 1.4. DfE statutory guidance 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education September 2022' sets out how all agencies and professionals should work together to promote children's welfare and protect them from abuse and neglect. It requires all educational organisations to follow the procedures for protecting children which are established by Bury Integrated Safeguarding Partnership (BISP). No single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 1.5. Holy Cross College has a pivotal role to play in multi-agency safeguarding arrangements. College has an inherent responsibility to contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children.
- 1.6. Safeguarding partners (the local authority; Integrated Care Systems' (ICSs) (previously known as clinical commissioning group) for an area within the local authority; and the chief officer of police for an area any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- 1.7. The guidance makes clear that educational organisations are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or is at risk of abuse, neglect or exploitation – these procedures should cover circumstances in which a member of staff is accused or suspected of abuse.
- 1.8. The college recognises its responsibilities regarding the protection of children from abuse, neglect or exploitation and from inappropriate and inadequate care and is committed to acting in accordance with Bury Integrated Safeguarding Partnership (BISP) and local Channel Panel Procedures (with respects to Prevent) in all cases where there is concern.

The College will keep its policy and procedures on safeguarding under review to take account of any new Government legislation regulations and best practice documents, to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children.

- 1.9. Circular 10/95 states that parents/carers should be made aware of the safeguarding policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child.
- The College Safeguarding Policy and Prevent strategy will be made available to parents/carers on the College website.
 - The College recognises the importance of its responsibility to the wellbeing of all children and vulnerable adults and to the guidance it provides for its staff.
 - The College will inform students of what to do if they require any form of safeguarding help, through the College Moodle site and tutorial sessions.
 - The College recognises that any individual can be subject to abuse (including sexual violence and harassment), neglect and exploitation and all allegations of will be taken seriously and treated in accordance with the college's procedures.
 - The College recognises that it is the responsibility of all staff; teaching and non-teaching, paid and volunteers to act upon any concern no matter how small, trivial or low level it may seem and report it to the DSL, DDSL or member of the Safeguarding Team
 - The College recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse, neglect or exploitation
 - The College requires all staff; teaching and non-teaching, paid and volunteers to follow the DfE guidance for 'Keeping Children Safe in Education – statutory guidance for schools and colleges September 2022'
- 1.10. The Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 has led to the formation Disclosure and Barring Service (Gov.uk: Disclosure and Barring Service) who make decisions about individuals who should be barred from working with children and to maintain a list of these individuals. Under the Safeguarding Vulnerable Groups Act 2006 it is an offence for an employer to knowingly employ someone in a regulated position if they are barred from doing so. It is also an offence for the individual who has been barred to apply for a regulated position (one which involves spending regular time working with children).
- 1.11. The Protection of Freedoms Act 2012 reduced the scope of "regulated activity" by focusing on whether the work is unsupervised (in which case it counts as "regulated activity") or supervised (in which case, organisations can request an enhanced criminal records check, but this will not include a check of the barred list). The Safeguarding Vulnerable Groups Act 2006 also imposed the legal requirement on employers to refer to the DBS information about employees or volunteers who (may) have harmed children while working for them.

1.12. Counter-Terrorism and Security Act 2015:

CONTEST is the Government's counter terrorist strategy; its aim is to reduce the risk to the UK and its interests overseas from terrorism.

THE PREVENT DUTY

Preventing Radicalisation

In respect of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, severe damage to property, or completely impedes or disrupts an electronic system. The use or threat of these actions must be constructed to influence the government or threaten the public and be made for the purpose of progressing a political, religious, or ideological cause.

In respect of this policy, "**extremism**" refers to the outspoken or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

In respect of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist beliefs connected with terrorist groups.

Protecting students from the risk of radicalisation is part of Holy Cross Colleges wider safeguarding duties. Holy Cross College will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in students' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. Holy Cross College will work with local safeguarding arrangements as appropriate.

Holy Cross College will ensure that they positively and purposefully engage with parents and families, as they are in a key position to identify signs of radicalisation. Holy Cross College will assist and advise family members who share concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the students' parents, unless Holy Cross College has reason to believe that the child would be placed at risk consequently.

Holy Cross College will ensure that all staff and Governors undertake Prevent awareness training to develop understanding and awareness of the risk of students being radicalised and drawn into extremism and/or terrorism. Holy Cross College staff will use the Prevent Awareness Training to ensure that they are alert to changes in students' behaviour which could demonstrate that they may need help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act accordingly.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), all schools and colleges are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "**the Prevent duty**". The Prevent duty will form part of Holy Cross Colleges' wider safeguarding obligations.

The aim of Prevent is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Delivery of Prevent is grounded in early intervention and safeguarding. Prevent addresses all forms of terrorism and continues to prioritise according to the threat posed to national security. The most significant of these threats is currently from terrorist organisations associated with Al Qa'ida, Daesh, terrorists associated with extreme right-wing ideologies and lone actors inspired by such organisations.

Prevent has three objectives in CONTEST:

- tackle the causes of radicalisation and respond to the ideological challenge of terrorism
- safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
- enable those who have already engaged in terrorism to disengage and rehabilitate

CHANNEL forms a key part of Prevent. The process adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. It is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the 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.

Holy Cross Colleges' procedures for conducting the Prevent duty, including how it will implement the Channel programme, are outline in the Prevent Duty Policy. Referrals to the Channel Programme can be completed via this online form [PREVENT REFERRAL FORM](#) and advice available from the GMP Prevent Team on 0161 856 6362

On-Line Safety The use of technology has become a significant component of many safeguarding issues. The internet can be a fantastic place for children and young people where they can talk to friends, be creative and have fun. However, the college is committed to managing the risks associated with the use of technology. Additionally, Governors of Holy Cross College ensure that online safety is a pivotal theme in the colleges' wider approach to Safeguarding.

Working with our students we have a tutorial that develop skills, knowledge, and behaviours in identifying and avoiding risk, learning how best to protect themselves and their friends, and knowing how to get support and report abuse if they do encounter difficulties.

IT filters and monitoring systems are in place, and these are regulated, and risk assessed as part of the Prevent duty. An Online Safety Policy identifies the usage and expected behaviour of staff and students. As a college we appreciate the value of technology and have appropriate filters in place, yet this does not lead to unreasonable restrictions which would limit online teaching.

The College will provide support, guidance and advice to children, young people, vulnerable and adults, parents, and carers on how to keep safe online. College has regular contact with parents and carers through a variety of channels. College will utilise these communications to reinforce the importance of children being safe online. College will ensure that parents and carers understand what systems college uses to filter and monitor online use. College understands that it is important for parents and carers to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the college (if anyone) their child is going to be interacting with online.

Through a period of online or distance learning it essential that staff have regular contact with students to ensure that they are still looking out for signs that they may be at risk. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

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

Harmful online challenges and hoaxes-- this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

SECTION 2:

HOLY CROSS SAFEGUARDING STRUCTURE

2.1. At Holy Cross the current Designated Safeguarding Lead (DSL) and Single Point of Contact (SPOC) who is responsible for reporting any concerns regarding individual(s) at risk of becoming drawn into terrorism is the:

Assistant Principal (Students)

2.2. (DSL) cover is currently provided by the:

Safeguarding Officer (Deputy DSL)

A team of Progress Tutors, the Counselling Coordinator, Learning Support Manager, SPLs, Wellbeing Officer are also recognised as part of the Safeguarding team.

2.3. A Link Governor is to be appointed for Safeguarding matters.

2.4. The College Safeguarding Steering Group meets twice a year to review overall strategy, policy, procedure, training for safeguarding and Prevent matters and is composed of:

DSL (Assistant Principal for Students), Safeguarding Officer, Link Governor, Premises manager, HR manager, Learning Support Manager, University Centre Manager, Counselling Coordinator

The College Pastoral Council meets weekly to review specific pastoral cases. Members of this group include Assistant Principal (Students), Safeguarding Officer, Learning Support Manager, Counselling Coordinator and Wellbeing Officer. Other staff may be invited as appropriate

SECTION 3:

WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN

3.1. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If you have **any concerns** about a child's welfare, you should act on them immediately. Staff should never attempt to investigate or resolve the matter themselves.

If staff have a mental health concern about a child that is also a safeguarding concern, they should immediately inform the College DSL, DDSL or member of the safeguarding team.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

3.2. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

3.3. Staff should never assume a colleague, or another professional will act and share information that might be critical in keeping children safe. Early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority (LA) children's social care (such as a child in need or a child with a protection plan).

3.4. Once you suspect or know of any safeguarding concerns, abuse, neglect or exploitation of any child you should immediately inform the DSL, DDSL or member of the safeguarding team. Even if you have only heard rumours or have a suspicion but do not have firm evidence, you should still discuss your concerns. You should also contact the Principal/DSL if you know or suspect that a member of staff or student has a previous history of abuse of children or vulnerable adults.

3.5. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. You should contact any one of the Safeguarding Team (identified earlier in the policy) or a member of the Senior Leadership Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or deputy) as soon as is practically possible.

3.6. If following your initial contact with the DSL, DDSL or member of the safeguarding team, it is decided that the matter should be taken further; a written report must be prepared.

This can be a disclosure form (see later in policy) or another written form for example, a secure e mail or a password protected document.

3.7. A written report is essential to prevent any misrepresentation of your findings and should be given to the DSL or DDSL immediately. The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse, neglect or other circumstances which led to your suspicions, or the account given to you of the safeguarding concern, abuse, neglect or exploitation by the child concerned, as accurately as you are able to record it. The report should be written immediately after a disclosure, signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the DSL or the DDSL.

3.8. Good record keeping is essential when managing all concerns of a safeguarding nature. Consideration should be given to storage of records and confidentiality. Good practice for keeping child protection records includes noting the date, event and action taken. All records should be signed and legible.

3.9. If a child at the college comes to you to report a safeguarding concern, apparent abuse (including sexual violence and harassment) neglect or exploitation, you should use the following guidelines.

Staff must:

- wherever possible have two members of staff present, (preferably one of them being the DSL or DDSL)
- make the child feel secure and safe
- recognise that the child has placed them in a position of trust, so they should be supportive and respectful of the child
- reassure them, let them know you are glad they have spoken up and that they are right to do so
- reassure them that they are being taken seriously, regardless of how long it has taken them to come forward to make a report and they will be supported and kept safe.
- be honest – let them know that you cannot promise confidentiality, as it is very likely that will need to share the concern further (for example with the DSL/DSL or children's social care) to seek advice, guidance and discuss next steps. It is important that the child understands who the report will be passed to and what the next steps will be
- reassure them that abuse that has occurred online or outside of college, will be treated equally seriously
- where the report includes an online element, the key consideration is for staff not to view or forward illegal images of a child.
- never give them the impression they are creating a problem by making a report
- never make them feel ashamed for making a report
- try to remain calm – remember this is not an easy thing for them to do
- allow them to speak without interruption
- never minimise or exaggerate the issue or their experience
- never make suggestions
- never coach or lead them in any way
- always ask enough questions to clarify your understanding, do not probe or interrogate no matter how well you know the child and spare them having to repeat themselves over and over
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them

3.10. The DSL/DDSL will be responsible for collating essential information about each case and for collecting reports and notes as appropriate.

3.11. Any detailed information about a case will be confined to the member of staff who received the disclosure, the child, the DSL, DDSL, Progress Tutor and in some cases members of the Pastoral Council and (if not involved in the allegations) the parents/ carers. Staff will be kept informed of the progress of the case on a 'need to know' basis.

3.12. Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the child is the overriding concern. The degree of confidentiality will be governed by the need to protect the child and any younger siblings. The child should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversation regarding the issue should always be held in private.

3.13. Whatever happens staff should always be open and honest with the child if they intend to take the case further.

3.14. Staff must not discuss the case with anyone other than those involved in the case.

3.15. Considering all the information available, the DSL will decide on the next steps, which may include taking no further action. Where the DSL decides that further action is necessary, this may be to:

- Seek further advice from others for example the Safeguarding Officer and Principal
- Make a referral to an external agency
- Report the matter to the police

3.16. If you are ever concerned about the welfare of a child outside of college hours, you should contact:

- Bury Multi-Agency Safeguarding Hub (MASH) Team on 0161-253-5678 or outside of office hours the Emergency Duty Team on 0161-253-6606;
- Greater Manchester Police on 101.

If the child is in immediate danger ring Greater Manchester Police on 999.

3.17. Use of 'reasonable force'

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

All incidents involving students and staff in the use of reasonable force must be reported to the DSL who will then report to the LADO Mark Gay, as quickly as possible as a matter of course. Although staff should never put themselves into any danger when faced with a violent or aggressive individual(s) it is their duty to raise the alarm and ensure that the DSL is alerted.

SECTION 4:

MAKING A CHILD PROTECTION REFERRAL

4.1 The DSL, DDSL will be responsible for making a referral to Bury Integrated Safeguarding Partnership (BISP), 18/20 St Mary's Place, Bury BL9 0DZ 0161 253 6153 if required.

For further details refer to website <https://burysafeguardingpartnership.bury.gov.uk>

During office hours Monday to Friday, the process for professionals contacting the MASH team in Bury is:

- If there is no immediate danger, or you need advice or information, telephone on 0161 253 5678 (outside normal office hours 0161 253 6606)
- For non-urgent enquiries, requests for strategy meetings, crime reports etc. via the MASH email: childwellbeing@bury.gov.uk.
- Anything with threat, harm, risk that requires urgent action or out of office hours, please call 101/999.

4.2 A Multi-agency referral form can be sent to the MASH team via email childwellbeing@bury.gov.uk

4.3 Consultation can also be sought from a duty Social Worker on 0161 253 5678 for a child protection referral.

4.4 If you do not receive any (same day) verbal feedback following an urgent child protection referral, and where this places a child / a child(ren) in a vulnerable position, you should ask to speak to a Duty Social Worker, the relevant Team Manager or the Lead Safeguarding Officer for Education, Gina Andrews 07974-604-223

SECTION 5:

INFORMATION SHARING

5.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Colleges have clear powers to share, hold and use information for these purposes. College staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. Serious Case Reviews (SCRs) have shown how poor information sharing has contributed to the deaths or serious injuries of children.

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

5.3 College does not require the consent of a parent/carers or student to make the completed multi agency referral form. However, a parent/carers should, under most circumstances, be informed by the referrer that a child protection referral is to be made.

5.4 The criteria for not informing parents are:

- (a) Because this would increase the risk of significant harm to a child(ren); or
- (b) Because, in the referrer's professional opinion, to do so might impede an investigation that may need to be undertaken.
- (c) Because there would be an undue delay caused by seeking consent which would not serve the child's best interests.

5.5 Fear of jeopardising a hard won relationship

5.6 relationship with parents/carers because of a need to refer is not sufficient justification for not telling them that a referral needs to be made. To the contrary, this lack of openness will do little to foster on-going trust, particularly as the source of referrals will be disclosed to parent/carers, except in a limited number of circumstances.

5.7 College/School Transfers - When an individual about whom there are safeguarding concerns leaves the college, we will endeavour to transfer the information to the individual's new college/school as soon as possible. We will also inform the Key Worker that the child has left.

5.8 Domestic Violence- Where staff are aware of incidents of violence between adults in households where there are children attending college, they will share these concerns with the DSL/DDSL They will consider the need for a formal referral to the based on their professional judgement and the level of any potential/actual risk to the individual.

SECTION 6:

CHILD PROTECTION ONLINE MANAGEMENT SYSTEM

CPOMS is college's mechanism for reporting and recording all Safeguarding concerns. CPOMS records are stored electronically and are confidential. CPOMS incidents are viewed and monitored by the wider Safeguarding Team however, other identified staff can be requested to take action. All associated written records are also attached to CPOMS.

[CPOMS guide.](#)

SECTION 7:

SAFEGUARDING COMMUNICATIONS WITH STUDENTS

7.1 We believe that college can play a part in the prevention of child abuse, neglect and exploitation through the curriculum. The College will support children through the promotion of a caring and safe environment, in line with the College's Mission Statement. The College will communicate about safeguarding through:

- Tutorials
- Core R.E. sessions
- Counselling services
- Support material on Moodle site
- Poster displays and national and local helpline telephone numbers
- Togetherall online platform

7.2 The Core RE programme and tutorials will raise related issues in a sensitive and reflective way concerning relationships, child-on-child abuse, rights and responsibilities, online safety and mental health. Through these sessions and also the curriculum students can be taught about the risks of different kinds of abuse (including sexual violence and harassment) and be taught skills they need to help them keep safe, and to feel that they can speak to members of staff should they have concerns of this nature.

7.3 Use of IT- Production, acquisition or transmission of any a material including photographs and video footage using IT or other means by any person in the College in violation of any United Kingdom law or college regulation is strictly prohibited. This includes but is not limited to copyright material, threatening or obscene material and material protected by trade secret. Any violation will lead to disciplinary action and a police investigation if necessary. The College does allow photographs and video footage to be taken at college-organised activities with the consent of those taking part as these records often form an important and treasured archive for the college and those individuals involved. This consent is collected as part of the enrolment process.

7.4 Written communications and Remote Learning. Full details of appropriate communications between staff and students whilst remote learning is contained in the 'Remote Learning' appendix.

7.5 Student Work Placements- Students will receive information about health and safety requirements prior to undertaking the placement. Individual risk assessments will be completed, where necessary, for vulnerable children, depending on the supervision arrangements at the placement – often guided by the Progress Tutor and Learning Support department.

7.6 Procedure for providing personal/intimate care - The child's right to privacy and dignity should be recognised throughout and every effort should be made to ensure that they are treated in a manner that reflects this concern. Always consult fully with the child requiring care to determine the level of support needed being mindful to encourage the child to be as independent as possible. This consultation should inform the child's individual care plan.

7.7 Ensure that a risk assessment is carried out and submitted to the Health and Safety Officer for consideration prior to undertaking any task requiring lifting or handling. Where hoisting is necessary, two members of staff must be present. Where hoisting is not necessary, but the child is unsteady on their feet the risk assessment must reflect the instances where two members of staff need to be present to minimise any risk.

SECTION 8:

ACCEPTABLE USE OF TECHNOLOGY

These guidelines provide advice on keeping information safe when using electronic media and aim to protect staff and students from putting themselves, or the College, at risk.

8.1 At Holy Cross College we appreciate the benefits and opportunities that new technologies offer to teaching and learning. We are committed to making the use of all available technologies in order to provide the best possible learning experience for our students. It is essential, however, that all staff take care with the information they make public and remember that once a comment or posting is made there will always be a permanent, digital record of it. As a result, comments made on-line are open to being re-published in other media.

8.2 Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. Adults should not share any personal information with a child, they should not request or respond to any personal information from the child, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny. Communications between an adult and a child outside agreed protocols may lead to disciplinary and or criminal investigations.

8.3 Any member of staff setting up a social network to enhance students' learning must ensure that their line manager is aware of this, and the purpose of the group or activity has been approved by SLT. At least one other colleague must be identified as an administrator so that they can have access to the site and checking for moderate content if necessary. It must not be your normal personal account.

8.4 Twitter should be used as an information broadcasting tool only, for 2-way communications. Therefore: broadcasts should be relevant to the subject area and none damaging to the College's reputation; people who 'follow' your broadcasts can be anyone who wishes; people that you 'follow' should only be subject relevant organisations or companies

8.5 Twitter should not be used as a 2-way communication tool with students, Parents/Carers or colleagues.

8.6 Staff must not invite students or prospective students to be a "friend" on their personal social networking site.

8.7 Staff should consider carefully the implications of on-line communication with former students.

8.8 Staff must not give their personal contact details to students including their mobile telephone number, including details of any blogs or personal websites.

8.9 Staff must only make contact with students for professional reasons and in accordance with college policies

8.10 Staff should recognise that text messaging is rarely an appropriate form of communication with individual students. However, the use of texting to convey a common message for groups of students is permitted, from a college phone or on the college system.

8.11 Staff should not use internet or web-based communication channels (that are not part of the college systems) to send personal messages to a student.

8.12 Staff should ensure that if a social networking site is used for educational and learning purposes, details are not shared with third parties.

Staff should ensure that if a social networking site is used that privacy settings are set at maximum

8.13 The IT facilities are provided for the purpose of fulfilling the educational objectives of the college and to assist students with their studies or staff with their work at the college. It is impossible to define every specific allowed use but examples of acceptable use include research for assignments and assessments, using online learning materials, or participating in discussion groups appropriate to individual courses.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment 37 required by the Prevent Duty.³⁸ The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like:[UK Safer Internet Centre: appropriate filtering and monitoring](#). South West Grid for Learning ([swgfl.org.uk](#)) have created a [tool](#) to check whether a school or college’s filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content Your Internet Connection Blocks Child Abuse & Terrorist Content)

Staff and students at the College must not:

8.14 Create or transmit any offensive, obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material. Some areas of the internet contain information or media which could cause offence to other people or may be illegal to download or view. Examples of misuse include uploading images or videos which show antisocial behaviour or illegal activities; making derogatory statements about the College, college staff or other students; or revealing confidential information about the College, college staff or other students. This list is not exhaustive. Users are prohibited from knowingly accessing, viewing or downloading such material.

8.15 Create or transmit any material of a sexist or racist nature, or any other material in contravention of the Equality Act 2010, or material of a libelous or of a terrorist nature.

8.16 Create or transmit any material in violation of any United Kingdom law or college regulation. This includes, but is not limited to, copyright material, threatening or obscene material, or material protected by the trade secret act.

8.17 Access material that involves extremist organisations and/or promote beliefs contrary to British values. As required under the UK government Prevent strategy.

8.18 Bring the college into disrepute through use of online, ‘social networking’ activities.

8.19 Use or produce materials to attempt to gain unauthorised access to the College IT facilities, or those of other organisations, including network scanning or probing activities

8.20 Create or transmit material which is designed or likely to cause annoyance, inconvenience or needless anxiety.

8.21 Create or transmit defamatory material.

8.22 Transmit material or use software which infringes the copyright of another person or third party.

8.23 Download, copy, store or supply copyright materials including software and retrieved data without the permission of the Copyright holder or under the terms of the license held by the College.

8.24 Create or transmit material which is likely to bring the College into disrepute

8.25 Engage in deliberate activities, which violate the privacy of other users.

8.26 Use chat-sites, or social media sites unless authorised by the College. Engage in any other actions that infringe current legislation.

8.27 Allow their account to be used by others or disclose their passwords to others

8.28 Use accounts or passwords belonging to others

8.29 Forge e-mail signatures or use College logos for unauthorised purposes

8.30 Initiate and / or forward 'chain' or 'junk' e-mail

8.31 Interfere or attempt to interfere with or destroy systems or software set up on college systems. This includes the loading or attempting to load unauthorised software onto college systems.

8.32 **Social Media and Mobile Technology** - 'Social media' is the term commonly given to web-based tools which allow users to interact with each other in some way, by sharing information, opinions, knowledge and interests online. As the name implies, social media involves the building of on-line communities or networks to encourage participation and engagement. This includes blogs, message boards, social networking websites (such as [Facebook](#), [twitter](#), [Instagram](#)) content-sharing websites (such as [Flickr](#), [YouTube](#)) and many other similar on-line channels. College policy is that normally, Facebook and other social networking sites cannot be used by staff or students. However, the learning opportunities afforded by this media are clearly beneficial to students and so the college will allow on-line channels that are pre-authorised by CLT which are monitored by specific departmental staff.

8.33 **Managing Potential Risks** - We actively promote the development of new and innovative means of enhancing our students' learning. However, staff must consider how anything communicated online could affect both their own professional reputation and the reputation of Holy Cross College and University Centre. We encourage staff to take a common-sense approach to this and act with the professionalism they demonstrate in other work-related situations.

8.34 Staff must therefore ensure that they establish safe and professional on-line behaviour, and note the following points:

- members of staff are personally responsible for any content they publish and must be mindful that this content is in the public domain, and permanent.
- it is important that staff should be professional at all times. The values expressed in our Mission statement, the guidelines in the Staff Code of Conduct and *the standards stated in the Single Equality Scheme* apply equally to involvement in social networks as they do in any other work-related situation.
- as in all published material, staff should be aware of issues such as libel, defamation and slander.
- confidential or sensitive information must be treated with great care. Staff must ensure that they do not contravene the General Data Protection Regulations (GDPR) by using information from college systems without the individual's consent, or by posting or transmitting information about the college, its staff or students or any third party.
- Recognise that text messaging is rarely an appropriate response to a child in a crisis, or at risk of harm. It should only be used as a last resort when other forms of communication are not possible.

8.35 IT and Remote Learning. Full details of HCC standards and appropriate use of IT whilst remote learning is included in the 'Remote Learning' appendix.

8.36 Personal and Recreational use

We recognise that many members of staff use the internet for personal and recreational purposes outside working hours and that many staff participate in social networking. All staff should keep their work and private use of social networking sites separate by creating separate profiles.

It is important to be aware that members of staff will automatically have an association with the college. Examples of ways in which staff are linked to the College when they are using the Internet are:

- using a college e-mail address as their contact e-mail.
- stating in their profile that they work for Holy Cross College.
- stating in a discussion online that they work for Holy Cross College.
- posting comments/information about the College on social networking sites.
- joining College staff networks on external websites.
- using social networking sites to communicate with students studying on the courses they teach or support.
- using networking sites from college computers.

8.38. This list is not exhaustive, but it illustrates how, even if it is not intentional, an individual's professional role as a college employee will affect the way that person and the college is perceived.

We therefore ask that staff:

- set their profiles to private, so that they control who they allow to see their detailed information.
- ensure that they do not conduct themselves in a way that is and/or could be seen as bringing the College into disrepute.
- ensure that any comments they post on these websites could not constitute bullying, harassment or discrimination.

8.39 Staff must not:

- Give their personal details to children, including their personal websites (or mobile telephone numbers).
- Must not use internet or web-based communication channels to send personal messages to a child.
- Must not share details of a personal social networking site with children.
- Must not follow children, be friends, or engage with social media Instagram, Facebook or similar -as this may be misinterpreted by students.

8.40 Personal safety when using the Internet

There is evidence that some websites, including those used for academic purposes, are accessed by users who wish to exploit young people. Students are advised to exercise care when communicating through the internet with people they do not know personally.

The following guidelines should be followed:

- Never arrange a meeting alone with someone you have contacted on the internet
- Never disclose any personal information through the internet to unknown persons or organisations
- Be aware that any unknown persons you are communicating with through the internet may not be who you think they are and photographs they display may not be their own.

SECTION 9:

TRAINING OF STAFF

9.1 It is essential that everybody working in a college understands their safeguarding responsibilities. All staff will be briefed or provided with an induction as to their responsibilities with regards to safeguarding, child protection and online safety by the DSL / Safeguarding Officer and or an external expert as part of their induction to work at the College.

9.2 Level 1 safeguarding training will also be given by a specialist training provider for all staff every 3 years.

9.3 Level 3 designated training will be provided for the Safeguarding Team, including the DSL, dealing with specified Pastoral duties in college every 3 years.

9.4 All staff will be required to read and understand:

- Part One of the ' Keeping Children Safe in Education' guidance (full document for safeguarding team) and to complete KSCiE Part 1 Questionnaire
- The Staff Code of Conduct
- The Holy Cross Safeguarding Policy (including Prevent Strategy) and they will be required to confirm this as part of the College Performance Review process.

9.5 **Supervision-** The College recognises that staff who are involved in any aspects of child protection work may find the situation stressful and/or upsetting, and will therefore ensure that they are properly supported. The DSL and Safeguarding Team will be responsible for supporting the staff concerned and where necessary, seek help from external agencies.

9.6 **Governors** - All Governors appointed to the college will be subject to enhanced clearance through the Disclosure and Barring Service. Governors will be offered level one safeguarding and child protection training (including online) as staff at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school/ college approach to safeguarding. Governors will receive updated training on a yearly basis. There is a Governor representation on the College Safeguarding steering group and there is a standing item report on safeguarding at every full meeting of the Governing Body.

9.7 All Governors are required to read Annex C of the KCSiE 2022 document in full to understand the role and responsibility of the DSL at Holy Cross College. This is in addition to the Safeguarding and Child Protection Training.

SECTION 10:

RECRUITMENT & SELECTION OF STAFF

10.1 The college will always endeavour to select staff who are both appropriately qualified and experienced to undertake the duties of the role and suitable to work with children and vulnerable adults.

10.2 The College will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009. Further information on the staff to whom these regulations apply, the checks that should be carried out, and the recording of those checks can be found in Disqualification under the Childcare Act 2006 statutory guidance. The College will comply with the guidance on Safer recruitment as detailed in the Keeping Children Safe in Education 2022 statutory guidance.

10.3 If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form of regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work.

10.4 The College has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

10.5 The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

10.6 **Definition of Regulated Activity** - An enhanced DBS certificate, which includes barred list information, as well as other relevant checks will be required for all staff engaging in regulated activity. A person will be considered to be engaging in regulated activity if as a result of their work they:

- will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
- engage in intimate or personal care or health care or any overnight activity, even if this happens only once.

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.

DBS Update Service- Individuals can join the DBS Update Service at the point an application for a new DBS check is made, enabling future status checks to be carried out to confirm that no new information has been added to the certificate since its issue. This allows for portability of a certificate across employers.

Before using the Update Service the College must:

- Obtain consent from the applicant to do so.
- Confirm the certificate matches the individual's identity; and
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g., enhanced certificate/enhanced including barred list information.

The College can then subsequently carry out a free online check. This would identify whether there has been any change to the information recorded, since the initial certificate was issued and advise whether the individual should apply for a new certificate

10.7 Pre-Appointment Checks -

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks. As expected from the consultation, the new KCSIE includes **recommendations for potential new staff to be subject to a “digital screening”** process prior to interview. Therefore schools/colleges should now consider online searches as part of due diligence checks on **shortlisted candidates**. The advice is that these checks should not be carried out prior to shortlisting due to risk of discrimination. On page 53, paragraph 220, the instruction reads:

“As part of the shortlisting process, schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.”

10.8 The College holds a Single Central Record (SCR), in accordance with national guidelines, which evidences that the following recruitment and vetting checks have been carried out on all newly appointed staff:

All Schools and colleges must:

- verify a candidate’s identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available.
- obtain (via the applicant) an enhanced DBS check (including children’s barred list information, for those who will be engaging in regulated activity with children).
- obtain a separate children’s barred list check if an individual will start work in regulated activity with children before the DBS certificate is available.
- verify the candidate’s mental and physical fitness to carry out their work responsibilities.
- verify the person’s right to work in the UK, including EU nationals.
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate.
- verify professional qualifications, as appropriate.
- before employing a person to carry out teaching work in relation to children, colleges must take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State.

10.9 Where checks are carried out on volunteers, the College will include this on the Single Central Record (SCR)

10.11 The recruitment section of the college website, individual job packs and application forms for all vacancies will include reference to the college’s commitment to safeguarding. Application forms have been designed in accordance with relevant guidance from the DfE and completed forms will be carefully scrutinised. In relation to recruitment adverts, Paragraph 210 states that the advert should include: The college’s commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken

The safeguarding responsibilities of the post as per the job description and personal specification, and whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are ‘protected’, so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ’s guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide.

10.12 Interview panels will include a member who has undertaken the Safer Recruitment in Education online training. Appointees will be required to demonstrate at interview that they are suitable to work with children and vulnerable adults. The interview panel will ask questions specifically relating to safeguarding.

10.13 Other adults on the college site

The level of recruitment and vetting checks on other third parties who have access to the College site such as volunteers, contractors, visitors, university staff and adult students will be risk based and consider the frequency and intensity of potential unsupervised contact with children. A "Risk Assessment for Commencement of Employment Pending Disclosure and Barring Service (DBS) Clearance" Form should be completed before the individual is permitted to access to the college site. The College is responsible for determining the appropriate level of supervision depending on the circumstances. Under no circumstances should a volunteer or third party be left unsupervised or allowed to work in regulated activity where no checks have been made.

10.14 Third parties who work on the site on a regular basis e.g., volunteers, supply staff, trainee teachers, cleaning and security staff will be subject to the recruitment and vetting checks by their employing organisation. The College requires written confirmation that these checks have been carried out and the details, along with DBS certificate numbers, are recorded on the college's Single Central Record. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, the College may conduct a repeat DBS check (which should include barred list information) on any such volunteer should they have concerns. The Contractor Guidelines and Declaration is regularly updated and issued, together with a reply letter that commits them to ensure any employees they send to work here will abide by the code.

10.15 A Code of Practice is in place for University Centre staff and adult students (see later in policy)

10.16 The College will deal with any allegations made against and/or concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors as outlined in part four of the Keeping children safe in education guidance 2022 and relevant College procedures.

SECTION 11:

ABUSE BY PROFESSIONALS- SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

11.1 Colleges will ensure that it promotes an open and transparent culture, in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately

11.2 If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children under 18 years of age, that indicates they:

- 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.

then the Principal must be informed immediately.

11.3 Where the allegation is made against a designated post-holder, the chair of governors must be informed immediately. Bury Integrated Safeguarding Partnership (BISP) procedures will then be followed. In all cases the Local Authority Designated Officer (LADO) for safeguarding must be made aware of all concerns.

The LADO for Bury, Mark Gay can be contacted via the Safeguarding Unit on Tel 0161-253-6168 or email lado@bury.gov.uk.

11.3 It is recommended that staff should:

- Contact their union representative
- Keep records of all conversation, meetings attended, letters received and telephone calls relating to the allegation.

11.4 If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with

under the College disciplinary policy, copies of which can be obtained from the Human Resources Moodle section. The College has a duty to report any case of misconduct to the Disclosure and Barring Service (DBS).

11.5 The College will endeavour to follow all nationally approved guidelines with respect to the safe recruitment of staff including the use of Disclosure and Barring checks. This will be extended to the assessment of risks associated with any work placement supervision being organised by the college.

11.6 Reporting Low Level Concerns

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

- 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.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

11.8 Examples of such behaviour could include, but are not limited to:

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

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

11.10 If staff have a low-level safeguarding concern about another member of staff, including those which do not meet the harm threshold then the Principal or DSL must be informed immediately. The DSL will notify the Principal of all the low-level concerns and in a timely manner according to the nature of each low-level concern. The Principal should be the definitive decision maker concerning all low-level concerns, although it is accepted that depending on the nature of some low-level concerns and the role of the DSL here in college, the Principal may decide to consult with the DSL and take a more collaborative decision-making approach

A "case manager" will be appointed to lead any investigation in college. This will be either the Principal, or DSL or, where the Principal is the subject of an allegation then the chair of governors will investigate this concern.

11.11 Reports about supply staff and contractors should also be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

11.12 Recording low-level concerns regarding staff

11.13 All low-level concerns about staff should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken by the College. The name of the individual sharing their concerns should also be noted. However, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

11.14 College will ensure that these records are kept electronically on CPOMS and will only be visible to the designated Safeguarding Team. College will ensure that these records are kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). HR will also record and keep records of all low-level concerns.

11.15 Records will be reviewed regularly so that potential patterns of concerning or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the College will decide on a course of action following its disciplinary procedures. When a pattern of behaviour moves from a low-level concern to meeting the threshold for harm then the College will refer this case to the LADO. Consideration should also be given to whether there are wider cultural issues within the College that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

11.16 College will retain this information until the individual leaves their employment.

11.17 References. In accordance with guidance contained within the KCSiE 2022 document college will only provide substantiated safeguarding concerns/allegations that meet the harm threshold in references. College will not include low-level concerns in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

11.18 Responding to low-level concerns

11.19 The College will ensure that all low-level concerns are responded to promptly and fairly. If the concern has been raised via a third party, the Principal or DSL should gather as much evidence as possible by talking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual identified and any witnesses.

11.20 The information collected will enable college to classify the type of behaviour and decide what further action may need to be taken. All information will be recorded in writing including a detailed rationale for the decision-making process and actions undertaken.

11.21 College's policy for responding to low level concerns is inherently a reflection and extension of the College's wider staff behaviour policy/code of conduct which all staff should have read and understood.

11.22 College places significant emphasis on Reflective Practice with a view to learning lessons and utilising every opportunity to improve practice. There is recognition that not every Safeguarding case is managed perfectly and that consequently college has an inherent responsibility for strengthening and improving procedures.

11.23 Concerns about safeguarding practices within the College

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the college's safeguarding regime and know that such concerns will be taken seriously.

11.24 In cases of whistleblowing regarding Safeguarding issues, you should contact the DSL (Designated Safeguarding Lead) or the College's Whistleblowing Champion.

11.25 You may confidentially contact the College's Whistleblowing Champion, who will be responsible for ensuring that the correct procedure is followed. Concerns may be raised verbally or in writing.

The Whistleblowing Champion is Kelly Needham, Lay Chaplain, Holy Cross College, Manchester Road, Bury, BL9 9BB. E-mail: kpa@holycross.ac.uk

The Whistleblowing Champion's liaison point with the Governing Body is through Ms. B Hyndman, staff governor.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

General guidance on whistleblowing can be found via <https://www.gov.uk/whistleblowing>

The NSPCC's 'What you can do to report abuse' [dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the College.

Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.19

SECTION 12:

RECOGNISING CHILD ABUSE, NEGLECT and EXPLOITATION

What college staff should look out for:

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a family member in prison or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care.
- is at risk of '**honour**'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Indicators of abuse and neglect

12.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an 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.

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

12.3 Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing

the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

12.4 Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it,

12.5 Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues

12.6 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

12.7 Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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.

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

12.8 **Child Sexual Exploitation (CSE)**

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

<https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/>

12.9 **Female Genital Mutilation (FGM)**

In respect of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-term damaging consequences. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they should speak to the Designated Safeguarding Lead (or deputy) regarding 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. This duty is outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18.

Additionally, this information should be shared with the MASH team for the locality in which the young person resides. Holy Cross Colleges' response to cases of FGM and Safeguarding students will reflect multi-agency working arrangements.

All staff will be aware of the indicators that students may be at risk of FGM. The existence of two or more of the following indicators could signify that a student may be at an enhanced risk of undergoing FGM include:

- Any girl withdrawn from PSHE.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- The socio-economic position of the family and their level of integration into UK society.

Indicators that FGM may take place soon include:

- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- When a female family elder is visiting from a country of origin.

All staff will be alert to the signs that FGM has already taken place so that the student can be offered immediate help, to support enquiries that protect other students, and criminal investigations can be initiated. Indicators that FGM may have already taken place include the student:

- Asking for help, but not being explicit about the problem due to embarrassment or fear.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Spending longer than normal in the bathroom or toilet.
- Being reluctant to undergo normal medical examinations.
- Having difficulty walking, sitting or standing.

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

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents/carers, extended family, or members of their community, could put the young person in a situation of significant risk. Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life! A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Forced marriage is a crime in the UK and a form of HBA. All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage:

- Regularly being absent from school.
- An obvious family history of older siblings leaving education early and marrying early.
- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Displaying a decline in punctuality.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.

Staff who have any concerns pertaining to a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL. Local safeguarding procedures will be implemented which could include a referral to MASH , the police or the Forced Marriage Unit.

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

12.10 Gangs and Youth Violence

Issues pertaining to gang or youth violence is an area of collective responsibility for the community and partner agencies. Schools or Colleges affected by these issues will be able to access advice and support from their local partners, such as the police, youth offending teams, other local authority teams or the voluntary and community sector. The Local Safeguarding Children Board (LSCB) has a strategy to address these issues.

[Gangs and youth violence: for schools and colleges](#)- Home Office Guidance.

Mental Health

All 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy'

12.11 Child-On Child Abuse

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of Child-On Child abuse.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak immediately to the DSL, DDSL or member of the Safeguarding Team.

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

12.13 Child-On-Child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of 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).

12.14 Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. 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.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain 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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk.

Children who are lesbian, gay, bi, or trans (LGBTQ+)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. Sometimes, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. It is evident that risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. Holy Cross College staff will strive to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. HCC has identified trusted adults within the wider Pastoral Team (Safeguarding Officer, Wellbeing Officer and Progress Tutors) that LGBTQ+ children can be open with. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. Our named member of staff is Bec Hyndman.

12.15 Staff should be aware of the importance of:

- The crucial role college plays in preventative education within the context of a whole college approach that creates a culture that does not tolerate any form of prejudice or discrimination, including misogyny/misandry. Colleges values and expectations pertaining to this are unequivocally underpinned by our Behaviour Policy, Pastoral Care and a meticulously planned programme of RE and tutorials
- challenging inappropriate behaviours.
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (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.

12.16 **What is sexual violence and sexual harassment?**

Sexual violence

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

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools 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. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

12.17 What is consent?

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

- a child under the age of 16 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.

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

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

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

It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- sharing of unwanted explicit content.
- upskirting (is a criminal offence¹⁴¹).
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media.
- sexual exploitation; coercion and threats.

12.19 Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

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

As a college we recognise that sexual violence and sexual abuse can happen anywhere and therefore all staff working at Holy Cross College are unequivocally advised to maintain an attitude of 'it could happen here'. As a college we are aware of and respond sensitively and appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline. This includes any incidents that

have occurred outside of the school/college. The Designated Safeguarding Lead, Safeguarding Officer or Deputy Designated Safeguarding Leads have a comprehensive insight into the wider safeguarding picture and will advise on the initial response by college.

Imperative considerations will include:

- the express wishes of the victim in respect of their perspective on how they want to proceed. This is crucial in the context of sexual violence and sexual harassment. It is imperative that victims are offered as much control as is reasonably possible pertaining to decisions concerning how any investigation will be progressed and any support provided. However, we recognise that it is vital that this is balanced with the college's inherent duty and responsibility to protect and Safeguard all students.
- the nature of the alleged incident(s) with specific focus whether a crime may have been committed and/or whether HSB has been displayed.
- the ages of the children/ young people involved in the alleged incident
- the developmental stages of the children/ young people involved in the alleged incident
- Awareness of a power imbalance between the children/ young people. For example, is/are the alleged perpetrator(s) significantly older? Does the victim have a learning difficulty or disability?
- if the alleged incident is a one-off or a sustained pattern of abuse and an understanding that this could also encompass other types of abuse.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children/ young people
- importance of understanding intra familial harms and any necessary support for siblings following incidents (KSCiE 2022 Update)
- are there ongoing risks to the victim, other children, young people, adult students or college staff, and
- other interconnected issues and contextual Safeguarding, including any associations to criminal exploitation to child sexual exploitation

If college is concerned about the welfare and safety of any student, we will ensure that the welfare of the student is paramount and that all staff act in the best interests of that student. Holy Cross College will adhere to universal safeguarding principles stipulated throughout this guidance. Our immediate focus will be to ascertain and implement the best support mechanisms to protect the victim, alleged perpetrator(s) and any other students involved or impacted because of the incident.

12.20 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 school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing,
- or signs of assault or unexplained injuries
- unexplained gifts or new possessions

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

- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment and
- having been involved in offending, such as theft or robbery.

12.21 Children potentially at greater risk of harm

Whilst all children should be protected, it is important that governing bodies and proprietors recognise some groups of children are potentially at greater risk of harm.

12.22 Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

12.23 Children missing from education

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. It is important the college's response to children missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child (LAC), where going missing from education may increase known safeguarding risks within the family or in the community.

12.24 Children requiring mental health support

Colleges have an important role to play in supporting the mental health and wellbeing of their students.

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.

12.25 Looked after children and previously looked after children

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

12.26 Sources of Stress for Children and Families

12.27 Many families under great stress nonetheless manage to bring up their children in a warm, loving and supportive environment in which the children's needs are met and they are safe from harm.

12.28 Sources of stress within families may, however, have a negative impact on a child's health, development and wellbeing, either directly or indirectly, because they affect the parents' capacity to respond to their child's needs. This is particularly the case when there is no other significant adult who can respond to the child's needs.

12.29 Social Exclusion

Many families who seek or are referred for concerns about their children's welfare suffer multiple disadvantages. Poverty may mean that children live in crowded or unsuitable conditions, have poor diets, health problems or disability, be vulnerable to accidents, and lack ready access to good educational and leisure opportunities. Racism and racial harassment are additional sources of stress for some families and young people.

12.30 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.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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 detrimental and long-term impact on their health, well-being, development, and ability to learn.'

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). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

Operation Encompass operates in most 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 school before the child or children arrive at school the following day. This ensures that the school 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. Police forces not signed up to operation encompass will have their own arrangements in place.

12.31 The Mental Health of the Parent/Guardian or Carer Mental illness in a parent or a carer does not necessarily have an adverse impact on a child, but it is essential always to assess its implications for any child involved in the family.

12.32 A study of 100 reviews of child deaths where abuse had been a factor showed clear evidence of parental mental illness in one third of the cases. Children most at risk of significant harm are those who feature within parental delusions, children who become targets for parental aggression and violence, or who are neglected because of parental mental illness.

12.33 Drug and Alcohol Misuse Drug and alcohol misuse does not necessarily have an adverse impact on a child but it is essential always to assess its implications for any child in the family e.g.:

- Impairment of the development of the unborn child
- Child's access to drugs or needles e.g., methadone stored in the fridge
- Adult's mental states or behaviour put child at risk of injury, distress or neglect.

SECTION 13:

UNIVERSITY CENTRE SAFEGUARDING POLICY

[Link to Policy](#)

SECTION 14:

CONTRACTOR CODE OF CONDUCT

14.1 This code of conduct outlines the standard of behaviour expected of contractors.

14.2 Contractors should behave in a professional manner and not leave themselves open to criticism by staff, students and visitors. All contractors must sign a Contractor Code of Conduct when they arrive on site.

14.3 This includes following the standards outlined below:

- Comply with any safety requirements e.g., wearing of safety helmets.
- Appropriate dress code to be always adhered to.
- Avoid physical contact with students.

- Avoid situations where they are alone with a student.
- Avoid making sexual or racial comments to, or in the presence of staff or students.
- Smoking is prohibited in all the College's buildings, throughout the site and around the local vicinity.
- Never use or be under the influence of alcohol or drugs.
- Do not use inappropriate language in the presence of staff or students.
- The use of radios or personal stereos is not permitted within the work area or inside any of the College buildings.

14.4 Dress Code

Adults who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake. This means contractors should wear clothing which:

- Is appropriate to their role
- Is not likely to be viewed as offensive, revealing or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogans
- Is not considered to be discriminatory and is culturally sensitive.

14.5 Contractors must ensure they wear- any deviation from this dress code must be by prior agreement with the Premises Manager

- Full-length trousers /knee length shorts
- A tee-shirt or shirt with sleeves (no vests)
- Safety boots
- A high visibility vest or jacket (where appropriate)

14.6 Behaviour

Contractors have a responsibility to treat all people with whom they have contact, with courtesy and sensitivity, and must conduct themselves with integrity, accountability and responsibility.

14.7 All adults should clearly understand the need to maintain appropriate boundaries in their contacts with young people. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

14.8 This means that contractors, sub-contractors and their employees should not:

- Have sexual relationships with students
- Have any form of communication with a student which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.
 - Make sexual remarks to, or about, a student.
 - Discuss their own sexual relationships with or in the presence of students.

14.9 Occasionally a young person may develop an infatuation with an adult. An adult who becomes aware that a young person is developing an infatuation, should report this immediately to the Estates Manager and DSL/DDSL so that appropriate action can be taken to avoid any hurt, distress or embarrassment.

14.10 Students have a responsibility to treat contractors with respect and courtesy. Contractors should report unacceptable behaviour to the Estates Manager.

14.11 College Facilities

Contractors (except cleaners, the vending machine engineer and security staff who have been subject to the normal college recruitment and selection safeguarding processes) are not permitted to use any of the college's facilities. The refectory/cafe or any other facilities within the buildings are **not** to be used for consuming food or drink, or as a rest facility.

14.12 Contractors are not permitted to take breaks in college communal and circulation areas. All breaks to be taken off-site, in their own compound or within their own vehicle.

14.13 The following must be signed and returned by all contractors before starting work on site:
[Contractors Code of Conduct](#)
[Contractors Signing in Sheet](#)

SECTION 15:

GUIDANCE FOR COUNSELLORS

SECTION 16:

ROLE OF DSL

The responsibilities of the DSL are:

16.1 The designation of a co-ordinating DSL should not be seen as diminishing the role of all teachers in being alert to signs of abuse as part of their pastoral responsibilities. Children are best protected when professionals are clear about what it requires of Individuals and how they need to work together.

16.2 Manage referrals

The Designated Safeguarding Lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

16.3 Working with others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Lead) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be

having on children's attendance, engagement and achievement at college.

- liaise with the Principal to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)

This includes:

to ensure that the College knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,

to support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

16.4 Information sharing and managing CPOMS

The Designated Safeguarding Lead is responsible for ensuring that CPOMS is kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

16.5 Raising Awareness

The Designated Safeguarding Lead should:

- ensure each member of staff has access to, and understands, the College's child protection policy and procedures, especially new and part-time staff.
- ensure the College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training

opportunities and the latest local policies on local safeguarding arrangements; and, help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

16.6 Providing support to staff

Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

16.7 Understanding the views of children

It is important that children feel heard and understood. Therefore, Designated Safeguarding Leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the college may put in place to protect them; and,

understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

16.8 Holding and sharing information

The Designated Safeguarding Lead should be equipped to:

- understand the importance of information sharing, both within the College, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

16.9 What should the DSL consider at the outset?

- What is the priority level and immediacy of risk / need?
- Can the level of need identified be met by the College?
- Can the level of need identified be met by working with the child, parents /carers and colleagues?
- What resources are available / what are their limitations?
- Is the level of need such that a referral needs to be made to an external agency?
- Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e., a child is suffering or is likely to suffer significant harm?)
- What information is available to the DSL: Child, Parents, Carers, Family & Environment?
- What information is inaccessible and, potentially, how significant might this be?
- Where can I access appropriate advice and/or support?
- If I am not going to refer, then what action am I going to take? (e.g., discussion with parents/carers or other professionals)

Rules of confidentiality dictate that it may not always be possible or appropriate for the DSL/DDSL to feedback to staff who report concerns to them. Such information will be shared on a 'need to know' basis only and the DSL will decide which information needs to be shared, when and with whom. The primary purpose of confidentiality in this context is to safeguard and promote the child's welfare.

SECTION 17:

HOLY CROSS PREVENT STRATEGY

17.1 Scope

The Prevent Strategy is part of wider college Safeguarding Policy which seeks to promote and safeguard the well-being of children and vulnerable adults from extremist ideology and radicalisation. The Prevent strategy is applicable to the whole college (6th form and University Centre) community (including peripatetic Music teachers and Sports coaches), Governors, teaching staff, support staff, students and volunteers.

17.2 Aims

- Ensure all staff are aware of their Prevent duty.
- Develop confidence within staff in their ability to identify children at risk of being drawn into terrorism and ensure that they feel that concerns will always be taken seriously.
- Ensure that staff are aware of their duty to challenge extremist views and behaviour which students may display.
- Ensure there is a clear protocol for referring concerns within college which is well understood by all staff.
- Ensure that there is a clear protocol for the SPOC (Single Point of Contact) to follow when a concern is raised.

17.3 Introduction

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children to involve them in extremist activity. This guidance is designed to provide a clear framework for staff with which to respond to safeguarding concerns for those children and young people who may be vulnerable to the messages of extremism.

In addition it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the child concern model/threshold of need and intervention model and the Channel process. National Guidance and Strategies are outlined in Section 1.10 of this policy.

17.4

- **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.

17.6 Equality and Diversity

All strategies are intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, national or ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage & civil partnership, pregnancy & maternity, age, religion/belief or

political/other personal beliefs.

17.7 College Mission & Ethos and Respect Agenda

The college will seek to promote its Mission and Ethos, the Respect agenda and British Values through such activities as the Core RE and tutorial programmes, assemblies and through the day-to-day work of the pastoral team, as well as through curriculum teaching and enrichment activities.

Staff should challenge any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff. This should be dealt with in line with our Pastoral Policy for students and, where appropriate, Disciplinary Procedures.

17.9 Staff should be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of college, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services, and police reports of issues affecting students in other settings.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.
- Arrangements for spiritual worship or Prayer do not give the opportunity for individuals to promote extremism.
- Messages that may be delivered by visiting speakers that may be interpreted as being extremist – organising staff should adopt a risk assessed approach when planning to use outside speakers and to discuss any concerns with the DSL and DDSL or Principal. Visiting speakers should be chaperoned and at least one member of staff should be present at all presentations delivered to students.

17.10 Understanding and Recognising Risks and Vulnerabilities of Radicalisation Principles

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. There are many factors that can make someone vulnerable to radicalisation. They can apply to any age, social class, religion, ethnic or educational background. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalization can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

17.11 There is no single route to radicalisation. However, there are certain behaviours which are often seen when someone is being led down the path of extremism. Experience shows that some of these behaviours and vulnerabilities can make a person more at risk of being exploited. Identifying them doesn't necessarily mean someone is being radicalised. There can be other explanations

behind the behaviours. These signs and vulnerabilities are not listed in any order of importance.

- Being influenced or controlled by a group
- An obsessive or angry desire for change or 'something to be done'.
- Personal crisis
- Mental Health issues
- Need for identity, meaning and belonging
- Desire for status, need to dominate
- Spending an increasing amount of time online and sharing extremist views on social media.
- Significant changes to appearance and/or behaviour.

17.12 Vulnerability/Risk Indicators

See **Prevent Risk Assessment below** for a list of risk indicators, which may be used when making an assessment on an individual at risk of being drawn into terrorism. It is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that those experiencing these factors are automatically at risk of exploitation for the purposes of extremism.

The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

17.13 Referral and Intervention Process

The Prevent Single Point of Contact (SPOC) is also the lead within the college for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

As with other safeguarding issues, where a member of staff has any concerns that a person or their family may be at risk of radicalisation or involvement in terrorism, they should complete a referral form/confidential Log entry and speak with the DSL without delay. The concern does not need to be evidence based; it may simply be a feeling that something is not right.

The DSL should offer advice and guidance and may decide that the concern may be addressed by action within the college working in close liaison with the relevant Progress Tutor. In this case, the college should take the appropriate action to address any concerns, and review whether the concerns remain after this. It may be that a Common Assessment Framework (CAF) is conducted by the Progress Tutor to better understand the issue and gather additional information.

The DSL may decide to initially contact the Prevent Team directly for a consultation. If following this initial consultation the decision is taken to refer to Channel then the DSL will request that the Safeguarding Officer completes a Channel referral and continue to liaise directly with Channel.

17.14 If, at any stage, it is felt that the individual poses an immediate danger to themselves or any other person, the police should be called immediately.

Working with other organisations, the police protect vulnerable people from being exploited by extremists through the Prevent Programme. The role of GMP Prevent Officers is to help people vulnerable to radicalisation move away from extremism.

The telephone contact number for the Prevent Team is [0161 8566345](tel:01618566345).

The telephone contact number for the national police Prevent advice line is [0800 011 3764](tel:08000113764)

In an emergency call [999](tel:999).

Online material promoting terrorism or extremism, can be [reported online](#) at

<https://www.gov.uk/report-terrorism>

17.5 Prevent Risk Assessment

17.6 Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC is responsible for:

- Ensuring that other staff in the organisation are aware who the SPOC is in relation to protecting individuals from radicalisation and involvement in terrorism.
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing individuals from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism.
- Raising awareness about the role and responsibilities of the organisation in relation to protecting individuals from radicalisation and involvement in terrorism.
- Raising awareness within the organisation about the safeguarding processes relating to protecting individuals from radicalisation and involvement in terrorism.
- Acting as the first point of contact within the organisation for case discussions relating to individuals who may be at risk of radicalisation or involved in terrorism.
- Making referrals of individuals at risk to Greater Manchester Police Practitioner or the Channel Co-ordinator as appropriate in line with the safeguarding policy.
- Collating relevant information from your organisation in relation to referrals of vulnerable children and young people or adults into the Channel process.
- Attending Channel meetings as necessary and carrying out any actions as agreed.
- Reporting progress on actions to the Channel Co-ordinator; and
- Sharing any relevant additional information in a timely manner

17.7 KEY CONTACTS

DC Darren Howarth (14351) Prevent Officer – N Division
GMP/North West Counter Terrorism Unit Greater Manchester Police HQ Northampton Road
Manchester M40 5BP
Darren.Howarth@gmp.police.uk

0161 8562476 / 0161 8566362

SECTION 18:

EXTERNAL VISITOR SPEAKER PROCEDURES

18.1 These procedures apply to all staff at Holy Cross Sixth Form & University Centre.

18.2 Visitors are welcome to Holy Cross and make a contribution to the life and work of the college in many different ways. The learning opportunities support and experiences they bring are encouraged and appreciated. However, it is the college's responsibility in the light of the Counter Terrorism Act 2015, to ensure that the security and welfare of the community is not compromised at any time whilst securing the right to Freedom of Speech outlined in the Education Act 1986.

18.3 There are basically 4 categories of visitors:

Category 1. Visitors attending meetings with members of staff or carrying out work (including Parents/Carers case conferences, business representatives, staff from other schools or colleges, contractors, auditors, moderators, and Ofsted Inspectors).

Category 2. Visitors whose purpose is to work directly with individual students (including Connexions advisers, Instrumental music lessons, sports coaches, examiners, external agency workers plus representatives taking part in the annual Fresher's Fair, Careers evenings, Careers workshops and Careers Progression Day events).

Category 3. External Speakers giving a presentation to a group of students other than careers

Category 4. Unknown or Unwanted visitors

18.4 PROCEDURES WHICH APPLY TO ALL VISITORS

Protocol when any visitor arrives

1. All visitors must report to the main reception.
2. Reception staff will ensure that all visitors sign in, are issued with a sticker and are made aware of the 'Visitor Agreement'
3. For visitors who are in a professional capacity reception staff will check ID and check the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks).
4. The reception staff will inform the organising member of staff that their visitor(s) have arrived.
5. Visitors may be escorted to their point of contact but more normally their point of contact will be asked to come to reception to receive the visitor.
6. On departing the College all visitors should leave via the main reception, sign out and leave their visitor sticker as evidence that they have left the premises.

NB: A visitor book/badges will also be available at the University Centre Reception. Separate arrangements will apply to Parent/Carer evenings.

SPECIFIC RESPONSIBILITIES OF THE ORGANISING MEMBER OF STAFF FOR DIFFERENT CATEGORIES

18.5 Category1. Visitors attending meetings with members of staff or carrying out work

- The organising member of staff should inform (by e-mail) the Principals PA for information to be provided at the weekly Senior Leadership meeting
- The organising member of staff should ensure that the visitor is aware of the visitor agreement and communicate to relevant members of staff any specific requirements as necessary with regards to parking, accommodation and hospitality.
- The contact will normally be required to meet their visitor(s) at reception.
- The contact will then be responsible for them while they are on site (in cases such as auditors and contractors the visitors may be left to carry out their work in a prescribed area as agreed prior to the visit).
- At no point should any visitor be left on their own with students unless this is linked directly to their work e.g., external agency support workers known to the college with DBS clearance.
- In the case of contractors carrying out estates work it is imperative that a full Risk Assessment is in place and the Estates manager has full knowledge of the planned work.
- A code of conduct for contractors must be issued.
- The Estates office staff should inform the admin team of any contractors due to carry out work in advance of their visit.
- Community Groups that hire or use the college facilities must make specific arrangements with the Estates Office and the leader is required to sign their group in at the university reception desk.

18.6 Category 2. Visitors whose purpose is to work directly with individual students

- Organising member of staff should ensure that all normal visitor policy requirements are followed as described above.
- Any visitor who is not DBS checked must not be left alone with a student at any point.
- Regular visitors to the college must have DBS clearance (see HR department).
- In the case of regular annual large-scale events such as, Fresher's Fair and Careers Progression Day the organising member of staff should liaise with the Estates manager with regards to any specific requirements in terms of accommodation or resources and check that the arrangements comply with the Risk Assessment on file.

18.7 Category 3. External Speaker giving a presentation to a group of students other than careers

- Staff members organising an external speaker must complete the External visitor's approval form and pass to the Principal's PA
- This should be completed in advance (at least 7 days) of the visit.
- Visiting speakers must be made aware of the External Speakers Agreement (provide by the member of staff who has booked the guest Speaker) and that their presentation will be brought to an early end, if the content proves unsuitable.

18.8 Category 4. Unknown or Unwanted visitors

- Any visitor on the college site not wearing a visitor's badge should be challenged politely by any member of staff to enquire who they are and their business on campus.
- They should be escorted to main Reception to sign in and issued with a visitor's badge.
- In the event that the visitor refuses to comply, becomes abusive or aggressive then they should be asked to leave the site immediately and security and senior staff alerted via the text ALERT

[Guest Speaker Form](#)

Remote Learning appendix to HCC Safeguarding Policy- Appendix 1

Please remember that whilst working remotely, we must continue to safeguard our students and staff. This appendix has been updated to address some of the specific issues relating to Covid19 and our present way of working with students, which involves remote communication.

If, at any point, a member of staff has any type of safeguarding concern they must report this to the most appropriate Designated Safeguarding Staff (who include current DSL (Assistant Principal Students), Safeguarding Officer, Progress Tutors). The updated Keeping Children Safe in Education 2022 (KCSiE) must continue to be the point of reference for any safeguarding concerns.

Progress Tutors will remain in contact with their tutees during working hours and be available if a student feels unsafe.

High risk/particularly vulnerable students will be monitored by our Safeguarding Officer and Pastoral Council on a regular basis.

Counselling will continue to be offered to those who presently benefit from this in-house service.

Learning Support will continue to work remotely with those students with EHCP/SEN needs.

Online safety

- Contact with students must only be in line with our acceptable use of IT - which can be found in the College Safeguarding Policy (available on Moodle or college website).
- Telephone conversations must only be used in an emergency, or with prior agreement of a line manager and the telephone number must be withheld - as detailed in the Covid-19 Holy Cross information booklet (found in the Covid-19 section on Moodle).
- If you choose to use face-to-face live delivery for lessons/work, please make sure you are dressed professionally and you must consider what is in the background in order that personal items are not revealed.
- Make it clear that students also need to treat this in the same way as a lesson and be prepared, dressed appropriately and be sitting ready to work with due consideration of their environment. Any lesson delivery is for the use of the students only and must not be shared inappropriately.
- Make sure you only use academic platforms and college contact details.
- Please be mindful of the guidelines around spending too long in front of a computer screen and take hourly breaks.

Safeguarding yourself and your students

- DO NOT ask students to join conferences where they have to use their private email or contact details.
- DO NOT invite external visitors into conferences without using the full Internal Visits System in advance (found under 'Visits' link on the CIS home page). This will involve the 'visit' being agreed by key staff and SLT.
- DO use channels which are provided by the college e.g., Teams, VLE where students are identified and secured by their college email or login.
- DO use the video facilities to allow your students to see you if you would like to (although you must check what else they can see behind you if you are at home).
- DO record your conference (and let participants know that you are about to do this) – it will allow you to share the recording with anyone who missed the live event and additionally acts a safeguarding check.
- DO require students to turn off the sound and video cameras on their devices in order to join the conference. Where necessary teachers can request that students turn on sound and camera.

- DO encourage students to use the text chat function to ask/answer questions. Students may have a microphone, but they may not.
- During Teams lessons with your students, you should set out some agreed 'rules' first:
- Normal classroom behaviour is expected: Students should be respectful of other users in the language that they use and in their onscreen behaviour (i.e., not take control of the screen).
- You should advise students before you start that you will record the interaction
- Any inappropriate student behaviour whilst teaching on-line should be reported to the line manager and Progress Team where necessary.

Accessibility considerations

- Remote learning should be available to all students on Teams. It is important that students are set work to complete and feel supported in their learning.
- Also, bear in mind that students may be sharing devices with other family members. The limitations of bandwidth of home Wi-Fi will also mean that multiple simultaneous devices may cause issues with connectivity.

Mental Health

- Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of students and their parents. Teachers should be aware of this in setting expectations of students' work when they are at home. Any concerns should be referred to the Progress Tutor.

Written communications to students

To continue supporting students remotely how we interact using emails and other electronic media must be professional, sensitive, and consistent. To keep yourself safe please follow these simple rules:

- Only send and reply to students using your college email address.
- Only send and reply to students during college working hours.
- Ensure emails are professional and formal at all times and in all circumstances.
- Please remember that well intended emails can easily be misinterpreted and have the potential to create safeguarding concerns.
- Without classroom context written feedback can also be misinterpreted causing unwarranted distress. Please be mindful and sensitive in the wording of your electronic comments.
- Please ensure that all communications are handled inside existing college systems (email, Microsoft Teams etc.).
- We recognise that there are many alternative software packages that offer online communications but, at this time, for safeguarding reasons and consistency of approach you must use existing college systems.
- Students may establish study groups using WhatsApp or other applications. Under no circumstances must you join such groups.
- Any inappropriate student communications should be reported to the on-line manager and the Progress Team where necessary.
- Please remember your safeguarding training and that you are representing the College at all times.
- Finally, do not use personal social media to comment on work related matters.

Appendix 2

Acronyms

This policy contains several acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long Form	Description
CCE	Child Criminal Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence
CSCS MASH	Children's social care services Multi-Agency Safeguarding Hub (Bury)	The branch of the local authority that deals with children's social care. In Bury this is known as MASH. Experienced children's services professionals, who are trained to deal with sensitive issues.
CSE	Child Sexual Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.
DBS	Disclosure Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the Data Protection Act.
DSL	Designated Safeguarding Lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout HCC.
EHC Plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student.
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.

GDPR	General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent
HBA	'Honour-based' abuse	So-called 'honour-based' abuse 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, and practices such as breast ironing.
HCC	Holy Cross College	Our college
ITT	Initial teacher training	A programme of training to achieve qualified teacher status
KSCIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education
LAC	Looked-after children	A child who has been placed in local authority care or where children's services have looked after a child for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer	Term relating to a community of people, protected by the Equalities Act 2010, who identify as a lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
QTS	Qualified Teacher Status	A requirement in England to work as a teacher of children in state schools and special schools.
SCR	Single Central Record	statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend HCC in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of HCC's special educational needs policy and provision of education to students with special educational needs.
SEND	Special educational needs and disabilities	A student is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most students their age.
SLT	Senior Leadership Team	Staff members who have been delegated leadership responsibilities in a school.
TAF	Team around the family	Led by the pastoral staff under the direction of the DSL.