



# Bollin Safeguarding and Child Protection Policy

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**Inspiring Learners Trust is totally committed to Safeguarding Children and to a culture of vigilance.**

**Safeguarding is core to our work, not an 'add-on'.**

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## 1. POLICY DEVELOPMENT AND REVIEW

This policy:

- has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002
- has been written in line with the Department for Education (DfE) statutory guidance – Keeping Children Safe in Education, September 2021, and any other relevant UK legislation and government guidance
- should be read in conjunction with 'Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children' 2018.
- applies at all times when providing services or activities directly under the management of the Bollin Primary School staff
- is publically available on the school's website (<https://bollin-primary.com/>)
- is provided to all staff (including temporary staff) at induction including the Staff Code of Conduct

Owing to the serious nature and importance of Safeguarding at Inspiring Learners Trust this policy will be **reviewed annually** in the autumn term and approved by the Trust Board as soon as possible thereafter.

The policy is provided to all staff at induction alongside our Professional Code of Conduct. In addition, all staff are provided with Part One and Appendix B of the statutory guidance '[Keeping Children Safe in Education](#)', DfE (2021).

**This policy has been amended to include advice for practitioners updated by the DfE as follows:**

**What to do if you're worried a child is being abused, DfE (March 2015)**

**Information Sharing: Advice for practitioners, providing safeguarding services DfE (2018)**

## 2. INTRODUCTION

Inspiring Learners Trust is totally committed to Safeguarding Children and to a culture of vigilance.

Safeguarding is core to our work, not an 'add-on'.

We are committed to deeply embedding a true safeguarding culture within our schools and throughout our Trust to ensure safeguarding practice is not just compliance (a tick box approach) but truly creates an environment where our children are safe, they feel secure and are enabled to thrive.

Our Trust ***Effective Safeguarding Culture Model underpins our approach.***

This policy has been developed to ensure that all adults in **Inspiring Learners Trust** are working together to safeguard and promote the welfare of children and young people.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our children, young people and staff. It identifies actions that should be taken to redress any concerns about child welfare.

The **Head of School** or in her absence, the authorised members of staff, have the ultimate responsibility for safeguarding and promoting the welfare of children and young people.

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. It is an integral part of all activities and functions of **Bollin Primary School**. This policy complements and supports other relevant school and Local Authority policies.

Under the Education Act 2002 schools/settings have a duty to safeguard and promote the welfare of their pupils and, in accordance with guidance set out in 'Working Together to Safeguard Children 2018'. **Bollin**

**Primary School** will work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address them.

The school's commitment to safeguarding the welfare of is our highest priority etc. and should be mentioned about developing and maintaining a 'culture of vigilance' to ensure that signs and symptoms of abuse are picked up both the opportunity for those wishing to cause harm to children is drastically reduced.

The purpose of this document is to ensure that all stakeholders are aware of the arrangements that **Bollin Primary School** has in place for safeguarding and promoting the welfare of its pupils. It provides guidance to help staff who may have concerns about the safety or welfare of a child, and sets out the school's position in relation to the safeguarding process.

This policy is consistent with all other policies adopted by the Trustees/Governors and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

- **Staff Code of Conduct**
- **Online Safety Policy**
- **Acceptable Use Policy**
- **Social Media Policy**
- **Curriculum Design**
- **Whistle Blowing Policy**
- **Health and Safety Policy**
- **Children Missing from Education Policy**

#### **Other relevant policies**

- **Learning Differences**
- **Behaviour**
- **Kindness/Anti-Bullying**
- **Equality Scheme**
- **Attendance Management**
- **Sex and Relationships Education**
- **Educational Trips and Visits**
- **Supporting Pupils with Medical Conditions (including First Aid)**
- **Intimate Care**
- **Attendance**

#### **TSCB Policies**

- **Managing Allegations and Concerns Against Staff and Volunteers**
- **Encompass Procedure**

### 3. ROLES AND RESPONSIBILITIES

See KCSIE 2021 Part 1 (paragraphs 6- 12), Part 2 (paragraphs 89 – 95), Annex C (paragraph 143)

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Natanya O'Hara	Bollin.admin@trafford.gov.uk 0161 928 8900
Deputy DSL	Steve Hampton Karen Weightman Kylie Spark	Bollin.admin@trafford.gov.uk 0161 928 8900
Head of School	Natanya O'Hara	Bollin.admin@trafford.gov.uk 0161 928 8900
Executive Head of School	Kylie Spark	Bollin.admin@trafford.gov.uk 0161 928 8900
Named Safeguarding Trustee	Kerry Cleary	<a href="mailto:kcleary@inspiringlearners.co.uk">kcleary@inspiringlearners.co.uk</a> 0161 928 8900
Named Safeguarding Governor	Elizabeth Robinson	<a href="mailto:erobinson@inspiringlearners.co.uk">erobinson@inspiringlearners.co.uk</a> 0161 928 8900
Chair of Governors	Helen Johnson	<a href="mailto:hjohnson@inspiringlearners.co.uk">hjohnson@inspiringlearners.co.uk</a> 0161 928 8900
Online Safety Lead	Chris McIntee	Bollin.admin@trafford.gov.uk 0161 928 8900

See Appendix 1 for further detail about specific Safeguarding responsibilities for the Head of School, Trust Board, Local Governing Body, Designated Safeguarding Lead and Staff.

### 4. DEFINITION OF SAFEGUARDING

**KCSIE 2021: Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:**

- protecting children from maltreatment;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes. (paragraph 4)

### 5. CREATING A SAFEGUARDING CULTURE

It is our aim to foster an effective safeguarding culture deeply embedded in our schools and across our organisation, creating and maintaining a safe learning environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

We aim to foster a culture where children thrive and EVERY child *feels* and *are* safe and secure, both physically and emotionally, and their well-being is strong, providing firm foundations for their growth as learners.

Our safeguarding culture is underpinned by seven strands:



See Appendix 2 for details of our Effective Safeguarding Culture Model.

## 6. PROFESSIONAL CODE OF CONDUCT

Staff and volunteers are required to complete an annual declaration (see Appendix 3) to show that they have read and understood the Professional Code of Conduct at Bollin Primary School. The school has adopted, in full, the Keeping Children Safe in Education (DFE September 2020) guidance. It is available on the school's website and through the DFE website.

The guidance is an attempt to identify what behaviours are expected of adults who work with pupils. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with pupils.

It is important that all adults working with pupils at Bollin Primary School understand the appropriate and safe behaviour expected of them. Providing staff with clear guidance will ensure that the school's expectations of Safer Working Practice are reinforced throughout a person's employment.

See [\*Staff Code of Conduct\*](#)

## 7. THE CURRICULUM

See [\*KCSIE 2021 Part 2 \(paragraphs 119 – 122\)\*](#)

**KCSIE 2021 – “... ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.” .” (paragraph 119)**

All children have access to an appropriate curriculum, differentiated to meet their needs. This enables them to learn to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve

conflict without resorting to violence, question and challenge and to make informed choices in later life. The curriculum also enables children to recognise when they are at risk and how to get help when they need it.

Children and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote respect and empathy for others, age-appropriately. There is access to information and materials from a diversity of sources which promote social, spiritual and moral well-being and physical and mental health.

Personal Health and Social Education, Citizenship and Religious Education lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, forced marriage, family patterns, religious beliefs and practices and human rights issues.

All pupils will know that there are adults in the school whom they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect.

The Governing Body ensures that children are taught about safeguarding, including safeguarding themselves online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through Personal, Social, Health and Economic education (PSHE), and through Relationship and Sex Education (RSE).

## **8. SAFER USE OF THE INTERNET AND DIGITAL TECHNOLOGY**

*See KCSIE 2021 Part 2 (paragraphs 123 – 135)*

**KCSIE 2021: “. It is essential that children are safeguarded from potentially harmful and inappropriate online material. . An effective whole school ... approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.” (paragraph 123)**

See Appendix 4 and our **Trust Online Safety, Acceptable Use** and **Trust Social Media Policies**

## **9. SAFER RECRUITMENT AND SELECTION OF STAFF**

*See KCSIE 2021 Part 3: (paragraphs 188 – 334)*

The school's recruitment and selection policies and processes adhere to the DFE guidance set out in 'Keeping Children Safe in Education - Statutory guidance for schools and colleges', Sept 2021 and any subsequent updates.

**KCSIE 2021: “It is vital that governing bodies and proprietors create a culture that safeguards and promotes the welfare of children in their school or college. As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges.” (paragraph 189)**

Senior leaders, the Trust Board and the governing body ensure that stringent recruitment and vetting procedures are in place for staff and other adults, and that nobody commences work unless all necessary checks are complete to a satisfactory level. The same rigour is applied when appointing volunteers.

See Appendix 5 for Safer Recruitment and Selection Procedures

See Appendix 6 for Risk Assessment for Volunteers

See **Volunteers in School Policy**

## 10. DISQUALIFICATION

*See KCSIE 2021 Part 3 (paragraphs 245 – 249)*

**KCSIE 2021: “For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018. 249. 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 on GOV.UK.” (paragraph 248)**

The school will implement the 2018 Childcare Disqualification Regulations by asking that staff to self-declare if they are disqualified under the Childcare Act 2006 are not able to work in an early years setting within the school (See Appendix 7)

## 11. POSITION OF TRUST

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

## 12. SAFEGUARDING PROFESSIONAL LEARNING PROGRAMME

Learning about safeguarding is given a high priority at Bollin Primary School. Expertise is extended effectively and internal capacity is built up. Managers ensure that staff regularly undertake a comprehensive range of learning to promote safe practice in classrooms, around the school and off site.

Staff Induction (see Appendix 8)

Safeguarding Professional Learning Programme (see Appendix 9)

See **Volunteers in School Policy**

A variety of learning materials on safeguarding are made available in school to ensure staff continually develop their understanding and practice around safeguarding. All learning and training is documented as part of the member of staff's Professional Learning record, which also helps us map learning needs across the staff team for further development. A checklist is used as part of the induction process, and thereafter in the performance management process to ensure all compulsory learning has taken place.

Safeguarding is always re-visited at least on an annual basis to ensure they are as confident and competent in carrying out their safeguarding responsibilities as they possibly can be.

Bollin Primary School has a strong working partnership with Trafford Strategic Safeguarding Partnership, which assists us in making sure that all of our learning and development activity is in line with statutory guidance, and other local guidance.

As and when required, other external agencies may be consulted to assist with staff learning and development.



### 13. MANAGEMENT OF SAFEGUARDING IN SCHOOL

In the event of a disclosure or child protection/safeguarding concern, options include:

- managing any support for the child internally via the school's own pastoral support processes;
- an early help assessment;
- a referral for statutory services, for example as the child is in need or suffering or likely to

**KCSIE 2021: "Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:**

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- 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." (paragraph 19)

If a child is in immediate danger or is at risk of harm, a referral will be made to Trafford Council's Multi-Agency Referral & Assessment Team/TRAFFORD CHILDREN'S FIRST RESPONSE (children's social care) and/or the police immediately. Anyone can make a referral. Contact details for TRAFFORD CHILDREN'S FIRST RESPONSE can be found in Section 27.

**KCSIE 2021: "All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments." (paragraph 16)**

**KCSIE 2021: "A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989." (paragraph 65)**

**KCSIE 2021: "If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken." (paragraph 59)**

## 14. RECORDING AND REPORTING CONCERNS

*See KCSIE 2021 Part 2 (paragraphs 71 – 72)*

All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a child and all such concerns must be taken seriously. If a concern arises all staff, volunteers and visitors must:

- Speak to the Designated Safeguarding Lead (DSL) or the person who acts in their absence
- Agree with this person what action should be taken, by whom and when it will be reviewed
- All concerns about a child or young person should be reported without delay and recorded using the school's agreed CPOMs system

## 15. CONFIDENTIALITY AND INFORMATION SHARING

*See KCSIE 2021 Part 2 (paragraphs 105 – 113)*

With effect from 25 May 2018, the statutory General Data Protection Regulations came into force. The school has developed a set of relevant and appropriate documents which are all available on the school's website. All data is maintained and managed in line with school GDPR policies and the agreed retention schedule (see separate GDPR policies).

Staff ensure that confidentiality protocols are followed and information is shared appropriately. The Head of School or Designated Member of Staff discloses any information about a pupil to other members of staff on a need to know basis only. Information sharing procedures are based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' 2018.

**KCSIE 2021: "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." (paragraph 110)**

**KCSIE 2021: "... allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk." (paragraph 109)**

All staff and volunteers must understand that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff and volunteers must be clear with children that they cannot promise to keep secrets.

Staff are aware that in a Child Protection/Safeguarding disclosure they must not agree to keep a secret or remain confidential to a child. They are duty bound to share this information with the DSL.

See [Data Protection Policy](#) for further information.

## 16. INFORMING PARENTS/CARERS

Our approach to working with parents/carers is one of transparency and honesty and our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers. In most cases parents and carers will be informed when concerns are raised about the safety and welfare of their child. Parents and carers should be given the opportunity to address any concerns raised.

Parents and carers will be informed if a referral is to be made TRAFFORD CHILDREN'S FIRST RESPONSE or any other agency.

Parents/carers will not be informed if it is believed that by doing so would put the child at risk. In such cases the Designated Safeguarding Lead or Head of School will seek advice from TRAFFORD CHILDREN'S FIRST RESPONSE.

## 17. RECOGNISING SIGNS OF CHILD ABUSE

*See KCSIE 2021 Part 1 (paragraphs 19 – 54)*

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another

**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 (e.g. via the internet). They may be abused by an adult or adults or another child or children.

See Appendix 10 for Recognising Signs of Abuse

## 18. CHILDREN POTENTIALLY AT GREATER RISK OF HARM

**See** Appendix 11 for further information about children potentially at greater risk of harm:

- Children who need a social worker
- Children Missing from Education (CME) (See [Children Missing from Education Policy](#))
- Children requiring mental health support
- Children with SEND (see [Learning Differences Policy](#))
- Looked After Children (see [Looked After Children Policy](#))

## 19. CONTEXTUAL SAFEGUARDING

- **KCSIE 2021:** “All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children 11 outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.” (paragraph 23)

## 20. SPECIFIC CHILD PROTECTION/SAFEGUARDING CONCERNS

*See KCSIE 2021 Part 1 (paragraphs 31 – 54)*

**See** Appendix 12 for further information and procedures about:

- Domestic Abuse (and Appendix 12a for Encompass Procedures)
- Forced Marriage
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Forced Marriage (FM)
- Female Genital Mutilation (FGM)

- Radicalisation and Extremism (see also Appendix 13)
- Upskirting
- Private Fostering
- Peer on Peer Abuse (see Appendix 14)

## 21. CHILD PROTECTION CONFERENCES AND CORE GROUP MEETINGS

Members of staff are likely to be asked to attend a child protection conference or other relevant core group meetings about an individual pupil and will need to have as much relevant updated information about the child as possible. A child protection conference will be held if it is considered that the child/children are suffering or at risk of significant harm.

All reports for a child protection conference should be prepared in advance of the meeting and will include information about the child's physical, emotional, intellectual development and well-being as well as relevant family related issues. This information will be shared with the parents/carers.

Staff dealing with child protection concerns and/or attending core group/conferences should receive supervision/debriefing opportunities in order to ensure their emotional and mental health and well-being.

## 22. SAFER WORKING PRACTICE

The school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.

See **Staff Code of Conduct**, **Low Level Concerns Policy** and **Volunteer in School Policy**

Staff and volunteers should be aware of current guidance on safe teaching practice contained in [\*Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings\*](#) (October 2015).

## 23. MANAGING ALLEGATIONS AND CONCERNS AGAINST PROFESSIONALS WHO WORK WITH CHILDREN

*See KCSIE 2021 Part 4: Section 1 (paragraphs 335 – 405)*

An allegation is any information which indicated that a member of staff (paid, supply or voluntary) may have:

- Behaved in a way that has or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in such a way that indicates they would pose a risk of harm if they worked regularly or closely with a child; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff has contact with in their personal or professional life.

See Appendix 15 for Managing allegations and concerns against professionals who Work with children Procedures.

## 24. LOW LEVEL CONCERNS

*See KCSIE 2021 Part 4: Section 2 (paragraphs 406 – 426)*

**KCSIE 2021: “A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:**

- **is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and**
- **does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO” (paragraph 409)**

See **Low Level Concerns Policy**

## 25. COMPLAINTS OR CONCERNS BY PUPILS, STAFF OR VOLUNTEERS

Any concern or expression of disquiet made by a child will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint. We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

## 26. SERIOUS CASE REVIEWS

The Trafford Safeguarding Children Partnership will always undertake a serious case review when a child or young person dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. The purpose of the serious case review is to:

- Find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of children and young people.
- Identify what those lessons are, how they will be acted on and what is expected to change as a result of the serious case review.
- Improve inter-agency working to better safeguard and promote the welfare of children and young people.

If required Bollin Primary School will provide an individual management report for a serious case review and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

## 27. CONTACT DETAILS

Multi-Agency Referral & Assessment Team (TRAFFORD CHILDREN'S FIRST RESPONSE) – Children's Social Care 0161 912 5125 <a href="mailto:TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk">TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk</a>	Local Authority Designated Officer (LADO) Anita Hopkins 0161 912 5125 <a href="mailto:TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk">TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk</a>
Trafford Strategic Safeguarding Partnership 0161 911 8687 <a href="mailto:tssp@trafford.gov.uk">tssp@trafford.gov.uk</a>	Police Non-emergency – 101 Emergency - 999
Out of Hours Emergency Duty Team Social Care 0161 912 2020	
NW Counter-Terrorism Unit Channel Team 0161 856 6362 <a href="mailto:channel.project@gmp.police.uk">channel.project@gmp.police.uk</a>	
National Domestic Abuse Helpline	<b>Refuge</b> runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked

Further Information on Safeguarding and Safeguarding Policies can be found on the TSCB Website at [www.tscb.co.uk](http://www.tscb.co.uk)

## 28. GLOSSARY

<b>A Child</b>	A person who has not yet reached their 18 <sup>th</sup> birthday.
<b>Abuse</b>	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 who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
<b>Bullying &amp; Cyberbullying</b>	Behaviour that is: <ul style="list-style-type: none"> <li>• Repeated</li> <li>• intended to hurt someone either physically or emotionally</li> <li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li> </ul>
<b>Child Protection</b>	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
<b>Child sexual exploitation</b>	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years. It can include both contact (penetrative and non-penetrative) and non-contact sexual activity and may occur without the child's or young person's immediate knowledge.
<b>Children with Special Educational Needs and/or disabilities</b>	SEN: a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability: a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
<b>Contextual Safeguarding</b>	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
<b>County Lines</b>	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
<b>Criminal Exploitation</b>	Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to



	<p>suburban and rural areas, market and seaside towns. Key to identifying potential involvement in <b>county lines</b> are missing episodes, when the victim may have been trafficked for the purpose of can affect any child or young person (male or female) under the age of 18 years;</p> <ul style="list-style-type: none"> <li>• can affect any vulnerable adult over the age of 18 years;</li> <li>• can still be exploitation even if the activity appears consensual;</li> <li>• can involve force and/or enticement</li> <li>• based methods of compliance and is often accompanied by violence or threats of violence;</li> <li>• can be perpetrated by individuals or groups, males or females, and young people or adults; and</li> <li>• is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.</li> </ul>
<b>Sexual Exploitation</b>	<p>CSE is a form of child sexual abuse.</p> <p>Sexual abuse 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 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.</p>
<b>Domestic Abuse</b>	<p>Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:</p> <ul style="list-style-type: none"> <li>• psychological</li> <li>• physical</li> <li>• sexual</li> <li>• financial</li> <li>• emotional</li> </ul> <p>All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.</p>
<b>Early Help</b>	<p>Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.</p>
<b>Emotional Abuse</b>	<p>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.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>



<b>Female Genital Mutilation (FGM)</b>	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
<b>Gangs &amp; Youth Violence</b>	<p>Defining a gang is difficult, They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang. A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
<b>Hate</b>	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation</li> </ul>
<b>Honour-based violence</b>	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.
<b>Low Level Concern</b>	<p>A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:</p> <ul style="list-style-type: none"> <li>• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and</li> <li>• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.</li> </ul> <p>Examples of such behaviour could include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• being over friendly with children;</li> <li>• having favourites;</li> <li>• taking photographs of children on their mobile phone;</li> <li>• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,</li> <li>• using inappropriate sexualised, intimidating or offensive language.</li> </ul>
<b>Neglect</b>	<p>Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• Protect a child from physical and emotional harm or danger.</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</li> </ul>
<b>Peer on Peer Abuse</b>	Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18.
<b>Physical Abuse</b>	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.
<b>Private Fostering</b>	Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with

	<p>parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.</p> <p>There is a mandatory duty to inform the local authority of children in such arrangements.</p>
<b>Radicalisation &amp; Extremism</b>	<p>Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p> <p>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 armed forces as extremism.</p>
<b>Relationship Abuse</b>	<p>Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.</p>
<b>Safeguarding and promoting the welfare of children</b>	<p>Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:</p> <ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing the impairment of children's mental and physical health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>• taking action to enable all children to have the best outcomes</li> </ul>
<b>Sexting</b>	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.</p> <p>They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.</p>
<b>Sexual Abuse</b>	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children</p>
<b>Terrorism</b>	<p>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 intimidate the public and is made for the purpose of advancing a political, religious or ideological state.</p>
<b>Trafficking</b>	<p>Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.</p>
<b>Upskirting</b>	<p>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 gender can be a victim.</p>

## **APPENDICES**

**Appendix 1 – Specific Safeguarding responsibilities (Head of School, Trust Board, Local Governing Body, Designated Safeguarding Lead and Staff**

**Appendix 2: Effective Safeguarding Culture Model**

**Appendix 3 – Staff Safeguarding Checklist**

**Appendix 4 – Safer Use of the Internet and Digital Technology**

**Appendix 5 – Safer Recruitment and Selection Checklist**

**Appendix 6 – Risk Assessment for Volunteers**

**Appendix 7 – Staff Disqualification statement**

**Appendix 8 – Staff Induction**

**Appendix 9 – Safeguarding Professional Learning Programme**

**Appendix 10 – Recognising Signs of Child Abuse**

**Appendix 11 – Children potentially at greater risk of harm:**

**Appendix 12 - Specific Child Protection/Safeguarding Concerns**

**Appendix 12a – Operation Encompass Procedures**

**Appendix 13 – Radicalisation and Extremism**

**Appendix 14 – Peer-on-Peer Abuse Procedures**

**Appendix 15 - Managing allegations and concerns against professionals who work with children**

**Appendix 16 – External Provider Safeguarding Declaration**

**Appendix 17 - Safeguarding Information and responsibilities for Outside Providers**

**Appendix 18 – Agency Staff Safeguarding Declaration**

**Appendix 19 – Department for Education – Child sexual exploitation – Definition and a guide for practitioners, local leaders and decision makers working to protect children from sexual exploitation – February 2017**

**Appendix 20 – Children missing education: statutory guidance for local authorities – 2016**

**Appendix 21 – TSCB Threshold Chart**

**Appendix 22 – Contextual Safeguarding – Contextual Safeguarding Network**

**Appendix 23 – UKCIS Sharing Nudes and Semi Nudes**

**Appendix 24 – HM Government guidance - What to do if you're worried a child is being abuse – Advice for practitioner**



## Safeguarding Responsibilities

### Headteacher / Head of School

The **Headteacher/Head of School** is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying alternate members of staff to act as the Deputy Designated Safeguarding Lead (DDSL) in his/her absence to ensure there is always cover for the role.
- A Designated Safeguarding Lead for child protection is identified and receives appropriate on-going training, support and supervision.
- The policies and procedures adopted by the Trust Board/Governing Body to safeguard and promote the welfare of pupils are fully implemented and followed by all staff including volunteers;
- Safe recruitment and selection of staff and volunteers is practised.
- Sufficient time and resources are made available to enable the Designated and Deputy Designated Safeguarding Leads to discharge their responsibilities, including attending inter-agency meetings, contributing to the assessment of children and young people, supporting colleagues and delivering training as appropriate.
- All staff and volunteers receive appropriate training which is updated annually.
- All temporary staff and volunteers are made aware of the school's safeguarding policy and arrangements.
- All staff and volunteers feel safe about raising concerns about poor or unsafe practice in regard to the safeguarding and welfare of the children and young people and such concerns will be addressed sensitively and effectively.
- Parents/carers are aware of and have an understanding of the school's responsibilities to promote the safety and welfare of its pupils by making its obligations clear in the school/setting prospectus.
- Appropriate safeguarding responses are in place for children who are absent from school or who go missing from education, particularly on repeat occasions.
- The Attendance Lead regularly liaises with the Designated Safeguarding Leads and classteachers to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.



## Safeguarding Responsibilities

### Trust Board

The **Trust Board** is responsible for:

- Identifying a member of the Trust Board as the designated trustee for Safeguarding and receives appropriate training. The identified trustee will provide the Trust Board with appropriate information about safeguarding and will liaise with the Executive Headteacher and Designated Safeguarding Leads.
- The Trust's Safeguarding and Child Protection Policy is reviewed annually and updated and the school complies with local safeguarding procedures.
- The Trust operates safe recruitment and selection practices including appropriate use of references and checks on new staff and volunteers.
- There are Safeguarding and Child Protection Policies together with a Staff Code of Conduct and a Whistleblowing Policy.
- The Trust has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Any weaknesses in Child Protection are remedied immediately.
- A named trustee for safeguarding, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Executive Headteacher.
- Safeguarding and Child Protection policies and procedures are reviewed annually and that the Safeguarding and Child Protection policy is available on the Trust website. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school / website.
- Enhanced DBS checks are in place for all Trustees and Local Governing Body members.
- Our Trustees will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children at our schools.



## **Safeguarding Responsibilities**

### **Local Governing Body**

**The Local Governing Body** of the school will ensure that:

- A member of the Local Governing Body is identified as the designated governor for Safeguarding and receives appropriate training. The identified Governing Body member will provide the Governing Body with appropriate information about safeguarding and will liaise with the Designated Safeguarding Lead member of staff.
- A senior leader has Designated Safeguarding Lead responsibility.
- The school's safeguarding policy is reviewed annually and updated and the school complies with local safeguarding procedures.
- The school operates safe recruitment and selection practices including appropriate use of references and checks on new staff and volunteers.
- All staff and volunteers who have regular contact with children and young people receive appropriate training which is up-dated by refresher training every year.
- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role.
- On appointment, the Designated Safeguarding Lead undertakes interagency training, at Level 4, and also undertakes an 'update' course every 2 years. In addition to formal training, DSL will ensure that they update their knowledge and skills at regular intervals but at least annually, to keep up with any developments relevant to their role.
- Any weaknesses in Child Protection are remedied immediately.
- A member of the Local Governing Body, usually the Chair, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher/Head of School.
- Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school website.
- The Local Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through sex and relationship education (SRE).
- Enhanced DBS checks are in place for all Local Governing Body members.
- Our Local Governing Bodies will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children at our school.



## **Safeguarding Responsibilities**

### **Designated Safeguarding Lead**

The **Designated Safeguarding Lead (DSL)** has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people registered in the school. The Designated Safeguarding Lead must be a member of the Senior Leadership Team of the school.

The Designated Safeguarding Lead is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the school's representation at Child Protection Conferences and any other relevant meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue.

**KCSIE 2021: "The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns." (paragraph 11)**

Arrangements are in place to ensure that at least one of the DSL trained persons in school is available when children are taking part in school led activity, this includes before and after school clubs and other extra-curricular activities.

The **Designated Safeguarding Lead** will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend up-dated training every two years.
- Provide relevant information to the Trust Board and LA on how the school carries out its safeguarding duties.
- Provide support and training for staff and volunteers.
- Ensure that the schools actions are in line with the TSCB Safeguarding Inter-Agency Procedures. (Guidance on these procedures may be found on the TSCB website at [www.tscb.org.uk](http://www.tscb.org.uk)).
- Refer a child if there are concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call using a Single Agency Referral Form (SARF).
- Keep copies of all referrals to TRAFFORD CHILDREN'S FIRST RESPONSE and any other agencies related to safeguarding children (CPOMs).
- Ensure that all staff and volunteers receive information on safeguarding policies and procedures from the point of induction.
- Ensure that any staff with specific responsibility for safeguarding children receive Level 2 and above training.
- Manage and keep secure the school's safeguarding records.



- Ensure that all staff and volunteers understand and are aware of the school's reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Keep a declaration form/record to show that staff have read and understood specific safeguarding resources/materials.
- Liaise with the Head of School about any safeguarding issues.
- Keep up to date with changes in local policy and procedures and are aware of any guidance issued by the DFE concerning Safeguarding.
- Send a pupil's child protection or safeguarding file separately from the main file to a new establishment if a pupil leaves the school. Keep a copy of the file in line with GDPR retention.
- Provide, with the Head of School, a termly report for the governing body, detailing any changes to the policy and procedures; training undertaken by the Designated Safeguarding Lead, and by all staff and governors; number and type of incidents/cases, and number of children on the child protection register (anonymised).
- During term time the designated safeguarding lead and/ or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.





## Safeguarding Responsibilities

### Staff

- All staff may raise concerns directly with Children's Social Care services.
- All staff must be aware that safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in this school.
- All staff are aware that safeguarding concerns about adults in the school should be made to the Designated Safeguarding Lead or to the Headteacher/Head of School.
- All members of staff and volunteers are provided with child protection awareness information at induction, including in their arrival pack, the school safeguarding statement so that they know who to discuss a concern with.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.

**KCSIE 2021: "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." (paragraph 55)**

**KCSIE 2021: "If staff have any concerns about a child's welfare, they should act on them immediately." (paragraph 56)**



**KCSIE 2021: "If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken" (paragraph 59)**

### Effective Safeguarding Culture



We are absolutely committed to embedding our Effective Safeguarding Culture Model with each school in our Trust.

	<ul style="list-style-type: none"> <li>• Everyone believes the welfare of children is paramount.</li> <li>• The needs and rights of children are at the heart of all decisions and actions.</li> <li>• The school is a listening organisation: Children's views are valued; Children are heard and believed.</li> <li>• Children are empowered and encouraged to speak up and self-advocate when they are unhappy or worried.</li> <li>• Children know what to expect of others and what is ok and not ok behaviour.</li> <li>• Children know what is expected of them.</li> </ul>
	<ul style="list-style-type: none"> <li>• The vision and mission of school includes a clear commitment to safeguarding and staff understand WHY safeguarding is so important.</li> <li>• There is an understanding that <i>people not policies keep children safe</i>. Leaders and staff at all levels <i>believe it could happen here</i>.</li> <li>• Values and behaviours are articulated and communicated and include clear expectations and a safeguarding mindset.</li> <li>• Staff understand what is expected of them – values, behaviours, conduct, professional boundaries.</li> <li>• The schools commitment to safeguarding is communicate to children, parents and everyone in the school community.</li> <li>• A visible commitment to safeguarding is seen and felt when spending time in school with children and staff through what people say and do.</li> </ul>

	<ul style="list-style-type: none"> <li>Safeguarding practice is driven by a school specific safeguarding action plan and safeguarding risk assessment.</li> <li>Our Safeguarding Risk Assessment informs our Safeguarding Professional Learning Programme.</li> </ul>
 <p>Policies, procedures and compliance</p>	<ul style="list-style-type: none"> <li>An up to date, compliant and contextually relevant child protection and safeguarding policy is in place.</li> <li>The child protection and safeguarding policy is communicated in an accessible and relevant format to and understood by staff, children, parents and all in the school community .</li> <li>Safeguarding is a focus of all policies and procedures including recruitment, training and induction, supervision, raising concerns, behaviour, well being, on and off site activities.</li> <li>Low level concerns, allegations and whistle blowing policies are in place and are communicated in an accessible format to and understood by staff, children, parents and everyone in the school community.</li> <li>“What to do if you are concerned” information is visible within the school and accessible to children and staff.</li> <li>Policies are regularly reviewed by asking So What?</li> </ul>
 <p>Courageous leadership, management and governance</p>	<ul style="list-style-type: none"> <li>Leaders at all levels role model and embody the school vision and values and their commitment to safeguarding of the school through their actions.</li> <li>Every leader sees safeguarding as their responsibility, safeguarding is not the sole responsibility of named leaders/ governors.</li> <li>Leaders create an open culture in which everyone is encouraged to take ownership for their behaviour and to challenge and raise concerns about safeguarding.</li> <li>Leaders are courageous in listening to and acting on concerns.</li> <li>Priority is given to discussing valuing the safety and wellbeing of children as well as their attainment and progress.</li> <li>Governors understand their responsibilities for safeguarding and challenge and support the school in being a safeguarding organisation.</li> </ul>

## Welfare and well-being

- The wellbeing of staff is a priority in the school.
- Staff wellbeing is discussed openly and actions taken to support the wellbeing of staff.
- Colleagues notice and offer support when others are in need of help.
- Pastoral care of students and care for their wellbeing is part of everyone's role – not an add on, a curriculum subject or a named person's responsibilities.
- Bullying is not tolerated by anyone, and action is taken quickly to respond to and resolve any issues.
- The school role models compassionate leadership at all levels – empathy, care and providing a safe environment for children to flourish are a priority.

## Working with others

- School has an open culture; Partnership and collaborative working outside of the organisation is encouraged and valued.
- School works in partnership and builds positive relationships with parents and carers.
- Local procedures are followed and statutory agencies are treated as partners.
- Information is shared openly in the best interest of safeguarding children.
- Support and advice is asked for when needed.
- A range of service and professionals are engaged with supporting the school in the safeguarding and wellbeing of children.

## Evaluation, reflection and learning

- The school is an open, learning organisation where self reflection and learning from mistakes is celebrated and encouraged.
- Regular reflective supervision/ one to one's take place which facilitate self reflection and learning.
- Leaders make time to observe staff demonstrating the values and their commitment to safeguarding.
- External and internal reviews and evaluation of safeguarding practice are welcomed.
- Regular reviews of safeguarding information and incidents takes place to identify learning.
- Lessons learnt are shared with all staff, leaders and governors to allow shared learning and action are put in place.
- Staff training in safeguarding is relevant to the school context and makes a positive impact on safeguarding within the school.

## Safer use of the Internet and Digital Technology

**KCSIE 2021: “The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:**

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>). **(paragraph 124)**

**Tyntesfield Primary School** recognise that in a modern learning environment, use of emerging technology, the internet, multimedia devices and digital imaging facilities are part of everyday requirements. However, a child/young person’s safety will remain the priority of the school.

All staff are aware that any items that have capability for use of the Internet or the creation of digital images (including mobile phones) must be used by children/young people under appropriate supervision. If any such item that belongs to a member of staff is brought onto the school site, it is the responsibility of that staff member to ensure that these items contain nothing of an inappropriate nature.

Children/young people are not permitted to directly access items that do not belong to the school.

If there is any suspicion that any multimedia device or computer contains any images or content of an inappropriate nature, the Headteacher or DSL should be informed immediately.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place; they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

### **Social Networking Sites**

Social Networking sites are part of everyday culture within the cyber environment and all staff will promote safe use of the internet to all children/young people. The school curriculum will include the input of appropriately trained personnel around Internet Safety and safe use of media items. Staff will ensure that any personal use of Social Networking sites does not in any way impinge upon the school or their professional standards. Any concerns regarding a staff member’s conduct should be brought to the immediate attention of the Head of School or the DSL.

Any attempt by a child/young person to contact staff via such internet sites will immediately be reported to the Head of School or DSL in order that appropriate advice can be given to the child/young person and their parents/carers regarding professional boundaries and the safety of the child/young person.

### **Sexting**

‘Sexting’ is one of a number of ‘risk-taking’ behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore

the risks associated with 'online' activity can never be completely eliminated. However, Tyntesfield Primary School takes a pro-active approach in its Computing and Enrichment programmes to help children to understand, assess, manage and avoid the risks associated with 'online activity'. The school recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

There are a number of definitions of 'sexting' but for the purposes of this policy sexting is simply defined as:

- Images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent.
- These images are shared between young people and/or adults via a mobile phone, hand held device, computer, 'tablet' or website with people they may not even know.

There are many different types of sexting and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that Tyntesfield Primary School applies a consistent approach when dealing with an incident to help protect young people and the school. For this reason, the Designated Safeguarding Lead (or DDSL in the absence of the DSL) needs to be informed of any 'sexting' incidents. The Online Safety Coordinator may be informed; he should then share this information with the DSL. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response. All colleagues are expected to be aware of this policy.

The school adopts the UK Council for Child Internet Safety guidance 'Sexting in schools and colleges: Responding to incidents and safeguarding young people' in respect of our response to sexting. This guidance clearly sets out how to handle incidents, should they occur and what preventative steps can be taken to educate young people. This guidance can be found in Appendix 7.

## **Mobile Phones**

This policy provides clear guidance on the use of mobile phones, with explicit reference to camera mobile phones, by both staff and pupils. Camera Mobile Phones Camera mobile phones are now the norm and a built in digital camera enables users to take high resolution pictures. These can be sent instantly to other mobile phone users or email addresses. They can also be posted on the internet or in chat rooms. There is a potential for camera mobile phones to be misused in schools. They can become an instrument of bullying or harassment directed against pupils or/and teachers.

### Staff Policy

Staff use of mobile phones during their working day should be:

- outside of their contracted hours
- not be in the presence of pupils (unless exceptional permission has been requested of and given by the Headteacher)

Mobile phones should be switched off and left in a safe place during lesson times. The school cannot take responsibility for items that are lost or stolen. Staff should never contact pupils or parents from their personal mobile phone or give their mobile phone number to pupils or parents. If a member of staff needs to make telephone contact with a pupil, they should use the school telephone in the office.

Staff should never send to, or accept from, colleagues or pupils, texts or images that could be viewed as inappropriate. With regard to camera phones, a member of staff should never use their phone to photograph a pupil(s) or allow themselves to be photographed by pupils.

This guidance should be seen as a safeguard for members of staff, the school and the Trust. Staff should understand that failure to comply with the policy is likely to result in the enforcement of the Whistleblowing Policy and associated procedures.

### Parent, Visitors or Volunteers Policy

Adults either in school or accompanying children on school trips should not use their cameras or mobile phone cameras to take pictures of pupils unless it is at a public event such as Sports day or Summer fair and of their own children. Adults, visitors or volunteers in school should only use their mobile phone within the confines of the school office or staff room. Personal cameras and mobile phone cameras should not be used to take pictures of children. If parents who accompany children on a school trip are asked by the teacher to take photos as a record of the educational visit, they will be issued with a school camera/ipad.

Parents accompanying children on school trips should not use their mobile cameras to take pictures of children.

### Pupil Policy

While we fully acknowledge a parent's right to allow their child to bring a mobile phone to school if they walk to and from school without adult supervision, we discourage pupils bringing mobile phones to school due to the potential issues raised above.

When a child needs to bring a phone into school, the phone must be left in the school office at the start of the day and collected at the end of the day. Phones should be clearly marked so that each pupil knows their own phone. Parents are advised that the school and Trust accepts no liability for the loss or damage to mobile phones which are brought into school or school grounds.

Where a pupil is found by a member of staff to be using a mobile phone, the phone will be confiscated from the pupil, handed to a member of the office team who will record the name of the pupil and attach it to the phone. The mobile phone will be stored by the school office and must be collected by an appropriate adult.

If a pupil is found taking photographs or video footage with a mobile phone of either other pupils or staff, this will be regarded as a serious offence and disciplinary action will be taken according to our Behaviour policy. If images of other pupils or staff have been taken, the phone will not be returned to the pupil until the images have been removed by the pupil in the presence of a senior leader.



## **Safer Recruitment and Selection of Staff Procedures**

*See KCSIE 2021 Part 3: (paragraphs 188 – 334)*

### **1. INTRODUCTION**

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in Education. The purpose of this policy is to set out the minimum requirements of a recruitment process that aims to:

- attract the best possible applicants to vacancies;
- deter prospective applicants who are unsuitable for work with children or young people;
- identify and reject applicants who are unsuitable for work with children and young people. The contents of this policy have been adapted from a model policy that reflects the guidance from DfE on Safer Recruitment. It also reflects the training in safer recruitment.

### **2. STATUTORY REQUIREMENTS**

This policy is based on guidance given in the document “Keeping Children Safe in Education” Sept 2021.

### **3. IDENTIFICATION OF RECRUITERS**

Our Headteacher/Head of School and Executive Headteacher have successfully received accredited training in Safer Recruitment procedures. The Trust will also move towards a position in which at least one members of the governing body / Trust Board has successfully received accredited training in Safer Recruitment procedures.

### **4. INVITING APPLICATIONS**

- Advertisements for posts – whether in newspapers, journals or on-line – will include the statement:

*“This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All post holders are subject to a satisfactory enhanced Criminal Records check.”*

- Prospective applicants will be supplied, as a minimum, with the following:
  - Job Application Form (Trafford/GMSS) including Equal Opportunities statement;
  - job description person specification;
  - copy of the advert;
  - statement regarding safeguarding and DBS information
  - the school's safeguarding and child protection policy;
  - the school's recruitment policy (this document);
  - the selection procedure for the post;
  - an application form. All prospective applicants must complete, in full, an application form. CVs alone must never be accepted as part of the application process.
  - School Information (where appropriate)

### **5. SHORT-LISTING AND REFERENCES**

- Short-listing of candidates will be against the person specification for the post
- References will always be sought before confirming a person's appointment, these will be written and about previous employment, this will check that information is not contradictory or incomplete. At least one reference will be from the candidate's current employer. When a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving



should be obtained from the organisation where they were employed. Written references are taken up at the shortlisting stage prior to interview.

- References will be sought directly from the referee. References or testimonials provided by the candidate will never be accepted. At least one of the references should be an employment reference, preferably within the last three years.
- Where necessary, referees will be contacted by telephone or e-mail in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.
- Where necessary, previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.
- Referees will always be asked specific questions about:
  - the candidate's suitability for working with children and young people;
  - any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children;
  - the candidate's suitability for this post. School employees are entitled to see and receive, if requested, copies of their employment references.

**KCSIE 2021: "The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain references before interview, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview." (paragraph 203)**

## **6. THE SELECTION PROCESS**

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.

Interviews will always be face-to-face. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview (which may be via visual electronic link).

Candidates will always be required:

- to explain satisfactorily any gaps in employment;
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters;
- to declare any information that is likely to appear on a DBS disclosure;
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.

Example 'Safeguarding' interview questions:

- "Tell us about an instance when you have taken action to help protect a child."
- "Describe the procedures that need to be in place to protect children."
- "How in your work or life so far have you tried to ensure that children are protected?"
- "What do you feel are the main drivers that led you to want to work with children?"
- "What are your feelings about children that make allegations against staff?"

## **7. PRE-EMPLOYMENT CHECKS**

Schools **must**:-

- verify a candidate's identity. Identity checking guidelines can be found on the GOV.UK website

- obtain a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidates mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- verify professional qualifications
- ensure candidates complete a confidential health questionnaire
- verify a person's right to work in the UK. If a person has lived or worked outside the UK, the school should make any further checks it feels appropriate (Overseas police checks (if lived overseas for 3 months over past 5 years). The school should also check for any information about any teacher sanction or restriction that an EEA professional regulating authority has imposed
- for staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009
- check that a person is not prohibited from teaching. The school can do this by using the Employer Access Online Service. A person who is barred from teaching must not be appointed to work as a teacher in a school or early years setting.
- If a qualified teacher is employed in a non-teaching role, the check must also be completed
- All schools must also check that a person taking up a management position is not subject to a section 128 direction which is made by the Secretary of State. Schools can carry out this check by accessing the Department for Education's Secure Access portal.

N.B. If a school has concerns about an existing staff member's suitability to work with children, the school should carry out all relevant checks as if the person were a new member of staff.

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.

## **8. SINGLE CENTRAL RECORD and DBS CHECKS**

Schools and colleges must keep a single central record, referred to in the regulations (described in the following paragraph) as the register.

The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school: in colleges, this means those providing education to children; and
- for independent schools, including academies and free schools, all members of the proprietor body.

The information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate if in regulated activity
- a prohibition from teaching check;
- further checks on people living or working outside the UK;
- Section 128 check for persons in position of management;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

### **Disclosure and Barring Service (DBS) checks.**

There are three types of DBS checks:- (See KCSIE 2020 for more guidance if needed)

- **Standard:** this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out;
- **Enhanced:** this provides the same information as a standard check, plus any approved information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed;
- **Enhanced with barred list check:** where people are working or seeking to work in regulated activity with children, this allows an additional check to be made as to whether the person appears on the children's barred list. As the majority of staff will be engaging in regulated activity, an enhanced DBS certificate which includes barred list information will be required for most appointments.

In summary, 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 carry out paid, or unsupervised unpaid work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care, or overnight activity, even if this happens only once.

Certificate information should be kept securely and hard copies should be placed in lockable, non-portable, storage containers. Access should be strictly controlled and limited to those who are entitled to see it as part of their duties. No copies of disclosure information (in any format) should be made without the prior agreement of the DBS.

Certificate information must only be handled by those who are authorised in your organisation to receive it in the course of their duties. Certificate information must not be shared with any third party without the consent of the applicant. It is a criminal offence to pass disclosure information to anyone who is not entitled to receive it.

The information about criminal records that is collected and processed during the recruitment process is sensitive personal data. It should be:

- Stored securely
- Shared only with those who need to know (such as the HR provider, members of the recruitment panel, or the safer recruitment lead)

Information **MUST NOT** be shared with other colleagues. For any records created during the process (for example, notes from disclosure discussions and criminal records assessments) applicants should be informed:

- How their information will be handled, stored and destroyed
- That they have a right to request: a copy of documents, that any inaccuracies are corrected, and that information is deleted

## Positive DBS Disclosures

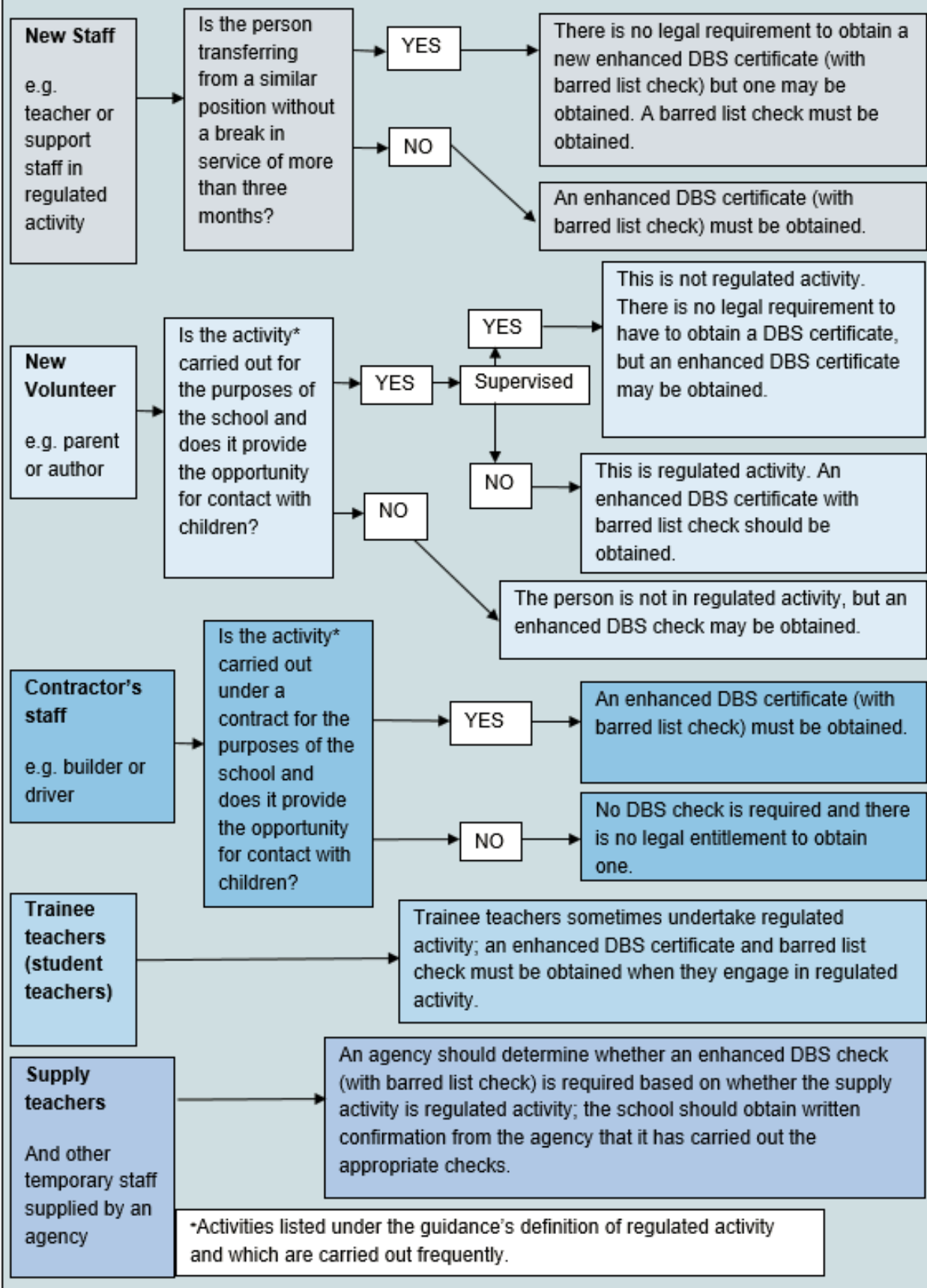
In accordance with the Rehabilitation of Offenders Act a criminal conviction does not automatically prevent an individual from working for the school. When assessing whether a positive Disclosure is acceptable, the following must be considered:

- whether they will be working in regulated activity and they are on the barred list
- whether they will be working with children under 8 and have committed offences that disqualify them from doing so
- the requirements of the role and level of supervision the worker will receive;
- how relevant the offence is to the role to be undertaken;

- how much time has elapsed since the offence was committed and whether it was a one-off incident or part of a history of offending;
- whether the individual's circumstances have changed since the offence was committed, making re-offending less likely;
- whether the individual was open and transparent about their past and declared relevant information where required.
- Consider the need for a disclosure discussion

The school may seek advice from the Local Authority HR department.

# **FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS**



## **9. INDUCTION**

All staff who are new to the school will receive induction training that will include the school's safeguarding policies and guidance on safe working practices. Regular meetings will be held during the first 3 months of employment between the new employee(s) and the appropriate manager(s).

## **10. VOLUNTEERS**

Volunteers are also seen by children as safe and trusted adults. All volunteers will be required to have a DBS check before they start their time in school. They will also have an induction meeting with the Designated Lead of the Federation school and will receive written information including the volunteer information booklet, safeguarding and child protection policy and code of conduct.

All volunteers/college students/work experience placements will have a risk assessment completed, ID check and safeguarding briefing prior to having any contact with children.

## **11. SUPPLY STAFF**

For supply staff, schools should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

All supply staff will have an identity check before working in the school. All schools will ensure that any supply agencies used verify that they follow the same safer recruitment process as the school itself.

## **12. GOVERNORS**

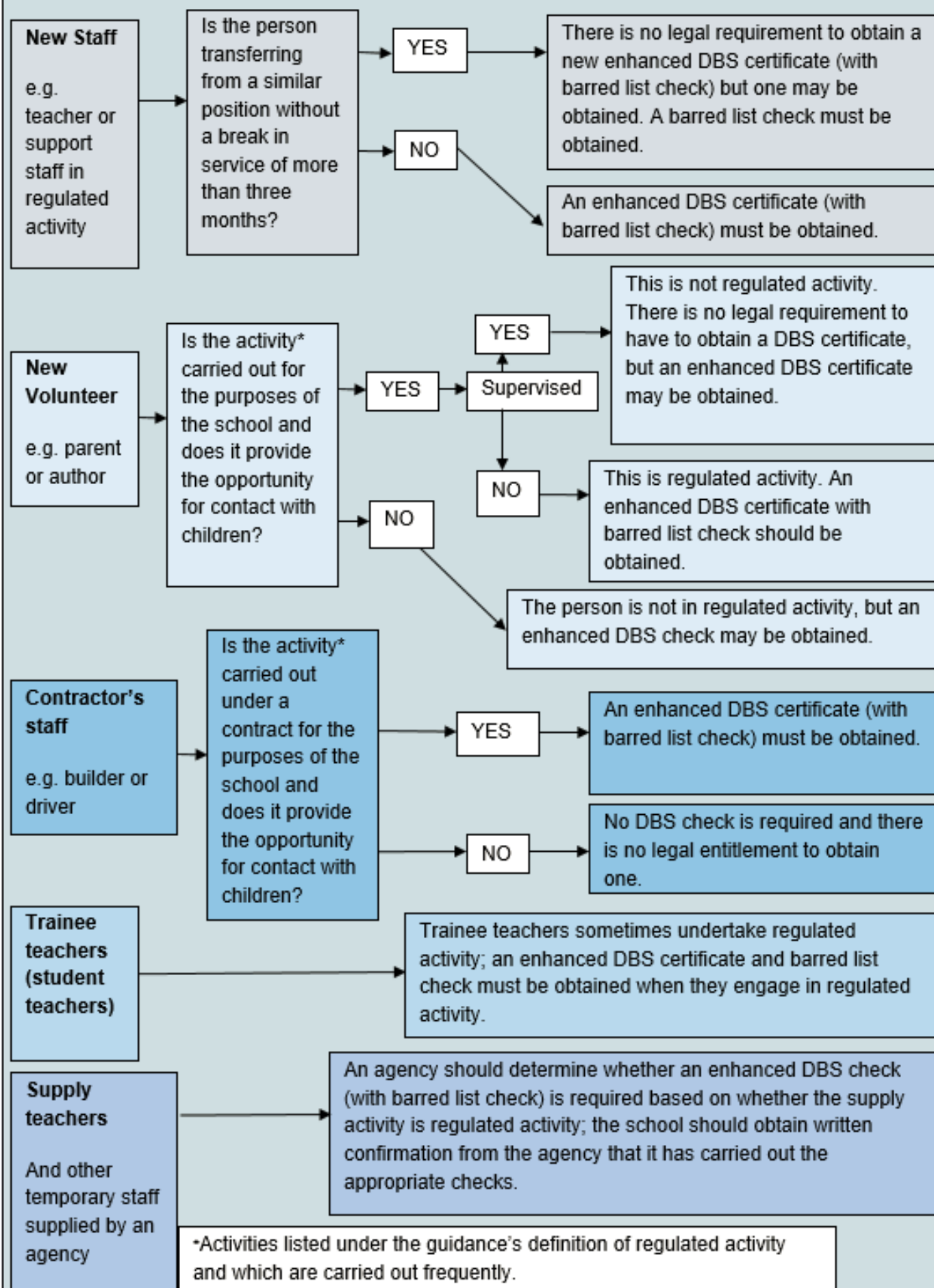
Schools must obtain an enhanced DBS and barred list check for all governors.

Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

If governors volunteer or carry out other duties that would be deemed as regulated activity they the appropriate checks must be applied.



## FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS



## Recognising Signs of Child Abuse

### 1. CATEGORIES OF ABUSE

All staff are aware of the categories of abuse, which are:



The definitions of which can be found below and in the glossary, and signs and symptoms of the four categories of abuse can be found below and in Appendix 3.

Staff are also made aware of other key safeguarding topics:

Bullying & Cyberbullying	Child Sexual Exploitation	Children with SEN and/or disabilities	Contextual Safeguarding	Criminal Exploitation 'County Lines'	Domestic Abuse	Early Help	Female Genital Mutilation
Gangs & Youth Violence	Hate	Peer on Peer Abuse	Preventing Radicalisation & Extremism	Private Fostering	Relationship Abuse	Sexting	Trafficking

The definitions of the above can be found in the glossary. Information and learning relating to the above topics is shared in school, but staff are also encouraged to undertake their own learning. More information in relation to staff training etc. can be found in the 'Staff learning and development' section of this policy.

### 2. SIGNS OF ABUSE IN CHILDREN

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

### 3. RISK INDICATORS

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:



- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

#### **4. RECOGNISING PHYSICAL ABUSE**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

#### **Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

#### **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

## **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **5. RECOGNISING EMOTIONAL ABUSE**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

## **6. RECOGNISING SIGNS OF SEXUAL ABUSE**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

## **7. SEXUAL ABUSE BY YOUNG PEOPLE**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Incidents of peer-on-peer abuse may need to be dealt with in various ways, incidents of bullying will be dealt with via the school's Kindness Policy and Behaviour Policy. Incidents which take place outside of

school may need to be addressed in school however the school are clear that where professional advice needs to be sought, it will be. The schools DSL will consult TRAFFORD CHILDREN'S FIRST RESPONSE on matters relating to the safety and welfare of a child and will consult the police in respect of matters relating to a possible crime.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

**Consent** – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

## **8. RECOGNISING NEGLECT**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

### **Children Potentially at Greater Risk of Harm**

Whilst all children should be protected, it is important that we recognise that some children are potentially at greater risk of harm:

#### **1. CHILDREN WHO NEED A SOCIAL WORKER** (Child in Need and Child Protection Plans)

**KCSIE 2021:** “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.” (paragraph 160)

#### **2. CHILDREN MISSING FROM EDUCATION**

**KCSIE 2021:** “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 school or college’s response to children missing from education supports identifying such abuse and also 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), where going missing from education may increase known safeguarding risks within the family or in the community.” (paragraph 164)

See **Children Missing From Education Policy** for further information

#### **3. CHILDREN REQUIRING MENTAL HEALTH SUPPORT**

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.

**KCSIE 2021:** “Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.” (paragraph 42)

**KCSIE 2021:** “Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.” (paragraph 169)

**KCSIE 2021:** “Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies should ensure they have clear systems in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.” (paragraph 170)

#### **4. CHILDREN WITH SEND (SEE LEARNING DIFFERENCES POLICY)**

For a number of reasons, children with disabilities are more vulnerable to abuse than others. For example children with disabilities may be more dependent on others for intimate care and may be less able to tell people about any abuse they experience. For these reasons, it is essential that rigorous safe recruitment

procedures are in place, especially with regard to recruitment checks on volunteers and paid workers, whistle blowing policies, and having clear guidelines setting out acceptable behaviour by those working with children with disabilities.

We recognise the particular vulnerabilities of children with SEND particularly with relation to the following:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- the potential for SEND children to be disproportionately impacted by behaviours such as bullying without showing signs;
- the specific barriers to communication for children with SEND.

**KSIE 2021: “Governing bodies and proprietors, should, therefore ensure that their child protection policy reflects the above and to address these additional challenges, schools and colleges should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.” (paragraph 186)**

## **5. LOOKED AFTER CHILDREN (See Looked After Children Policy)**

**KCSIE 2021: “A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.” (paragraph 178)**

**KCSIE 2021: “Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher<sup>44</sup> and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.” (paragraph 179)**

## Specific Safeguarding / Child Protection Concerns

### **1. DOMESTIC ABUSE**

The school is aware that children and young people's development, as well as their social and emotional resilience, is affected by many factors including exposure to domestic abuse within the family situation and is a safeguarding issue.

*Children and young people react to domestic abuse in similar ways to other types of abuse and trauma.*

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

Any child or young person thought to be at immediate risk will be reported without delay to TRAFFORD CHILDREN'S FIRST RESPONSE or the Emergency Duty Team will be contacted as soon as possible.

The school has opted in to Trafford's Operation Encompass. This is a scheme that provides a method of sharing information regarding domestic abuse between Greater Manchester Police, Trafford Council and Schools, and enables the Designated Safeguarding Lead to be provided with information, explaining that a child was present in a household at the time that an incident of domestic abuse was recorded as having taken place. (See TCSB Encompass Procedure – July 2017). The process for sharing information through Operation Encompass can be found in Appendix 12a.

### **2. FORCED MARRIAGE**

The school is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. Forced marriage is a form of child, adult and domestic abuse and, in line with statutory guidance, is treated as such by this school. Child abuse cannot be condoned for religious or cultural reasons.

Information about Forced Marriage will be incorporated into staff Safeguarding and Child Protection training and briefings and the school's Safeguarding and Child Protection Policies will be used to protect a victim or potential victim of forced marriage.

If a case of forced marriage is suspected, parents and carers will not be approached or involved about a referral to any other agencies.

### **3. CHILD CRIMINAL EXPLOITATION (CCE)**

**KCSIE 2021: "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." (paragraph 32)**

**KCSIE 2021: "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." (paragraph 33)**



#### **4. CHILD SEXUAL EXPLOITATION (CSE)**

**KCSIE 2021: “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. (paragraph 36)**

**KCSIE 2021: “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. (paragraph 37)**

**KCSIE 2021: “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.” (paragraph 38)**

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

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in their dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

## **5. FORCED MARRIAGE (FM)**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

## **6. FEMALE GENITAL MUTILATION (FGM)**

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015).

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

### **What is FGM?**

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

### **Why is it carried out?**

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

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

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

'Mandatory Reporting of Female Genital Mutilation - procedural information', Home Office (October 2015)

### **The 'One Chance' rule**

**As with Forced Marriage there is the 'One Chance' rule. It is essential that settings / schools / colleges take action without delay. There is a mandatory duty on teachers to report disclosures on FGM about a female under 18 personally to the police.**

The Serious Crime Act 2015 strengthened further the legislation on FGM and now includes:

- the right to anonymity for victims
- the offence of failing to protect a girl aged under 16 from the risk of FGM
- the provision of Female Genital Mutilation Protection Orders (FGMPO); and
- the duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18.

n.b. for school staff this will occur from a disclosure and not a physical examination

## **7. RADICALISATION**

Tyntesfield Primary School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

Schools have a statutory duty (Counter Terrorism and Security Act 2015 - The Prevent Duty), in the following areas with the aim of safeguarding pupils from radicalisation, extremism and terrorism:

- Assessing the risk of pupils being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology.
- Demonstrating that robust safeguarding policies are in place to identify children at risk, and intervening as appropriate (see Appendix 5: Prevent Duty Referral Protocol)
- Ensuring that clear protocols are in place so that any visiting speakers are suitable and appropriately supervised within school.
- Ensuring that fundamental British values are promoted within the curriculum and extra-curricular activities and reflected in the general conduct of the school.
- Schools should promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Ensuring that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Trafford Safeguarding Children Board (TSCB). This policy describes procedures which are in accordance with government guidance and refers to locally agreed inter-agency procedures put in place by the TSCB.
- Training key staff to give them the knowledge and confidence to identify children at risk of being drawn into terrorism and challenge extremist ideas. They should know where and how to refer children and young people for further help.
- Protecting children from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering.

## **8. PEER ON PEER ABUSE**

**KCSIE 2021: “All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). 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 peer on peer abuse and know how to identify it and respond to reports.” (paragraph 46)**

**KCSIE 2021: “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 peer on peer abuse they should speak to their designated safeguarding lead (or deputy).” (paragraph 47)**

Governing bodies and proprietors should ensure that their child protection policy includes:

- procedures to minimise the risk of peer on peer abuse;
- how allegations of peer on peer abuse will be investigated and dealt with (see Appendix 4)
- clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;
- recognition of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously; and
- the different forms peer on peer abuse can take, such as:
  - bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence and sexual harassment;
  - Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  - sexting (also known as youth produced sexual imagery)
  - initiation / hazing type violence and rituals

The policy should include the school or college’s approach to it. The department provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCCIS)

Education Group has recently published sexting advice for schools and colleges; and initiating/hazing type violence and rituals”.

“A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group”.

“On commencement of sections 4 to 6 of the Children and Social Work Act 2017 designated teachers will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.”

## **9. UPSKIRTING**

**KCSIE 2021: “upskirting (which is a criminal offence<sup>37</sup>), 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.” (paragraph 145)**

## **10. PRIVATE FOSTERING**

Private Fostering arrangement is one that is made privately between two parties without the involvement of the Local Authority for a child under the age of 16 (18 if disabled). This arrangement would be with someone who is not a parent or close relative, and lasts 28 days or more. Private Fostering is used as a form of childcare by parents who are not able to take care of their child on a day to day basis, for whatever reason. However, unreported Private Fostering Arrangements can be used in order to exploit children.

The Law requires that the Local Authority should be informed at least six weeks in advance of a Private Fostering arrangement or 48 hours after the arrangement has been made if in an emergency. Social Workers will:

- Check the suitability of the Private Foster Carers through checks and assessment;
- Make regular visits to the child and monitor the standard of care; and
- Ensure that Private Foster Carers and birth families have all the necessary information and advice they require.

There is a mandatory duty to inform the local authority of children in such arrangements.



## Operation Encompass Flowchart



## Operation Encompass Process

Police attend an incident of Domestic Abuse.

Police Protection Investigation Unit (PPIU) document is created and action set to Operation Encompass Coordinator.

Details of perpetrator, victim and all children who usually reside at the address (whether present during DA incident or not) are recorded.

'Voice of the Child' is recorded.



The next school day Operation Encompass Coordinator will send a notification email to the school and follow this up with a telephone call.

Emails will be sent securely.

Operation Encompass Coordinator will attempt to send relevant notification to the school before 9am (12pm at the latest).



Headteacher/Safeguarding Lead/Deputy Safeguarding Lead will review information, assess the risk and develop a working strategy.

Working Strategy may include checking child's records for recent concerns, discussing with child's teacher/tutor and providing overt or silent support.

If there are CP concerns then MARAT should be contacted.

## Radicalisation and Extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism
- The DSL will make referrals in accordance with Trafford Channel Procedures and will represent our school at Channel meetings as required
- Guidance and advice provided by the DFE, national and/or local services will be adhered to/considered where appropriate
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils

### Prevent Duty Referral Protocol

**STEP 1** When a concern is identified, as with all safeguarding concerns, the member of staff may seek clarification from the individual but must be careful not to lead or investigate. Details of the concern are shared at the earliest opportunity with one of school's designated named persons for safeguarding. Staff member records on CPOMs.

**STEP 2** The designated named person for safeguarding will discuss the concern, (including the relevant context) with the member of staff (the referrer) and document the report.

**STEP 3** The DSL to check if any additional concerns are known/documented in the school's safeguarding records, then alert the Head Teacher or another designated named person. Jointly they should consider if the concern falls within general safeguarding concerns (see step 4) or if a Prevent referral should be made (see step 5).

**STEP 4** School to follow general safeguarding protocols taking action to support and/or make referral to social care (Trafford First Response – 0161 912 5125) where appropriate.

**STEP 5** The designated named person for safeguarding to make a referral to the Local Authority safeguarding team. This is usually via the Local Safeguarding partnership or the Multi-Agency Safeguarding Hub (MASH).

<https://www.traffordsafeguardingpartnership.org.uk/safeguarding-children-and-young-people/Children-in-Specific-Circumstances/Prevent.aspx>

**STEP 6** After consideration, if warranted, the Local Authority to pass the referral to the Channel co-ordinator for management through to the Local Authority Chaired Channel panel.

**STEP 7** The Channel panel convenes to consider support options.

**STEP 8** If deemed suitable by the Channel panel a holistic package of support will be determined and delivered. Please note school may be involved as part of the multi-agency support offered.

**STEP 9** As with all aspects of safeguarding, even if Channel support is deemed suitable and offered, school retains a duty of care. As such staff should remain vigilant, reporting any new or further concerns to school's designated named persons for safeguarding.



## **PEER-ON-PEER ABUSE PROCEDURES**

### **1. WHAT IS PEER ON PEER ABUSE?**

Peer on peer abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. Peer on peer abuse is behaviour that intentionally hurts another individual or groups either physically or emotionally. It is more likely that girls will be victims and boys' perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse can take many forms including serious bullying (including cyberbullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence and is often motivated by prejudice against particular groups steered by a dislike for a person's:

- race;
- religion;
- gender;
- sexual orientation;
- special educational needs or disabilities;

or where a child:

- is adopted or in care;
- has caring responsibilities;
- is suffering from a health problem;
- is frequently on the move (e.g. those from military families or the travelling community);
- is experiencing a personal or family crisis ;
- has actual or perceived differences (e.g. physical or cultural differences).

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns.

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

There may be reports where the alleged incident is between two pupils from the same or different schools but is alleged to have taken place away from the school premises. The safeguarding principles, and the school's duty to safeguard and promote the welfare of their pupils remain the same regardless of where the incident took place and regardless of whether the incident was online or offline.

Abuse is abuse and will never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence. We will not dismiss abusive behaviour between children as 'normal' and our thresholds for investigating claims and allegations are the same as for any other type of abuse.

Preventing violence and ensuring immediate physical safety is our school's first priority but we also acknowledge that emotional abuse can be just as damaging if not more so than physical violence. We recognise that abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of abuse having control over the relationship which makes it difficult for the victim to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

We also acknowledge that low level disruption and the use of offensive language can have a significant impact on its target. If left unchallenged or dismissed as ‘banter’ or ‘horseplay’, it can also lead to reluctance to report other behaviour.

## **2. CONTEXTUAL SAFEGUARDING**

Children’s experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to peer on peer abuse therefore needs to consider the range of possible types of peer on peer abuse set out above and capture the full context of children’s experiences. This can be done by adopting a ‘contextual safeguarding’ approach and by ensuring that our response to incidents of peer on peer abuse takes into account any potential complexity.

This Policy and procedures encapsulate a contextual safeguarding approach, which:

- is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
- recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and
- considers interventions to change the systems or social conditions of the environments in which abuse has occurred.

## **3. TYPES OF ABUSE**

There are many forms of abuse that can occur between peers and the following list is not exhaustive:

### **3.1 Physical abuse**

Physical abuse may include hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action to take or sanctions to introduce.

### **3.2 Bullying – physical, name calling, homophobic etc.**

Bullying is unwanted, aggressive behaviour that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Young people who bully and those who are bullied can have long-term problems.

To be considered as bullying, the behaviour must be aggressive and include:

- an imbalance of power: young people who bully use their power, such as physical strength, access to embarrassing information, or popularity to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- repetition: bullying behaviours happen more than once or have the potential to happen more than once.

Details of our anti-bullying strategies and procedures can be found in our Whole School Behaviour Policy and procedures.

### **3.3 Cyberbullying**

The rapid development of, and widespread access to, technology has provided a medium for cyberbullying, which can occur in or outside school. Cyberbullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience. Cyberbullying involves the use of mobile devices,

instant messaging, e-mail, chat rooms or social networking sites such as Facebook, Instagram, Twitter etc. to harass, threaten or intimidate someone for the same reasons as outlined in 3.2 above.

Cyberbullying can fall into criminal behaviour under the Malicious Communications Act 1988 (Section 1) which states that a person who sends electronic communications which are “indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim” would be deemed to have committed an offence. The Communications Act 2003 (Section 127) further supports this and states that a person is guilty of an offence if he/she sends by means of a public electronic communications network a message or other matter that is grossly offensive or of an indecent, obscene or menacing character or if for the purpose of causing annoyance, inconvenience or needless anxiety to another he/she sends a message by means of a public electronic communications network knowing that the message is false.

If the behaviour involves the taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no option but to involve the Police to investigate these allegations.

### **3.4 Bullying which occurs outside the school premises**

We will follow the procedures outlined in the Whole School Behaviour Policy and our disciplinary powers to address the conduct of pupils when they are not on school premises and are not under the lawful control or charge of a member of school staff. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, off site during lunchtimes, during the evening at weekends or during the school holidays.

Where abuse outside of school is reported to the school, we will investigate and take appropriate action. We will also consider whether it is appropriate to notify the Police if we believe an offence has taken place.

### **3.5 Sexting (Nudes or Semi Nudes)**

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude/semi nude pics’ or ‘rude pics’ or ‘nude/semi nude selfies’. Pressuring someone into sending a nude picture, can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003.

Any direct disclosure by a pupil (male or female) will be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to a school’s attention we will follow the guidance as set out in the UKCCIS publication Sexting in Schools and Colleges: Responding to incidents and safeguarding young people.

### **3.6 Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a school or sports team etc. Hazing can also be used as initiation into a street or other ‘gang’. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older or established members of the organisation or ‘gang’, because they have all experienced this as part of a ‘rite of passage’. Many rituals involve humiliation, embarrassment, abuse and harassment.

### 3.7 Prejudiced bullying/behaviour

The term prejudiced-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices related to disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

### 3.8 Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/or emotional abuse perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. Abuse can occur online and offline and is never acceptable.

### 3.9 Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any sex. They 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. Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. We recognise the importance of distinguishing between problematic and abusive sexual behaviour.

- **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;

In relation to any reports or disclosures of sexual violence and sexual harassment between children we will:

- make it clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- challenge behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and other private areas of the body.

Ultimately any decisions on how to proceed with an allegation of sexual violence and sexual harassment will be made on a case by case basis with the DSL (or deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the Police as required.

Some situations, however, are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law; and
- creating and sharing sexual photos and videos of under-18s is illegal (see para 3.5 – Sexting). This includes children making and sharing sexual images and videos of themselves.

### **3.10 Upskirting,**

Upskirting 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

## **4. MANAGING THE DISCLOSURE**

Our initial response to a disclosure from a child is that the disclosure will be taken seriously. All our staff know how to use CPOMS to log the incident, this is a vital and must be done immediately. This is part of gathering critical information from a child relating to their disclosure.

- The member of staff to whom the disclosure is made will reassure the child that they will be supported throughout and kept safe.
- Staff will never assume that someone else is dealing with the alleged incident. If in doubt, they will speak to the Designated Safeguarding Lead (DSL).
- Details of the disclosure will be passed to the DSL immediately or as soon as practically possible on CPOMS.
- The DSL will manage the concern from the member of staff, child or parent.
- The DSL will follow the school's Child Protection procedures which will ensure they gather as much information and context relating to the disclosure as possible. Where necessary, advice will be sought from the TRAFFORD'S FIRST RESPONSE who will advise on how to proceed with the concern.
- Other agencies such as Police and Social Care will be notified and become involved if appropriate.

### **4.1 Gathering the facts**

It is important to gather a broad view of the facts at an early stage.

- Wherever possible, manage the disclosure and subsequent interviews of those involved with two members of staff present (preferably one being the DSL or deputy DSL).
- All those involved in the alleged incident should be spoken to individually and separately.
- Gain a statement of facts from those involved using consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the children to tell you in their own words what happened.
- Only interrupt the child to gain clarity with open questions – where, when, why, who. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene? etc.)
- Staff will not promise confidentiality at the initial stage and will inform those involved who the report will be passed on to.
- A written record, via CPOMs, will be made immediately by the person to whom the disclosure is made and passed to the DSL for action.

### **4.2 Considering confidentiality and anonymity**

Staff will never promise confidentiality as it is likely that it will be in the best interests of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

We will only engage staff and other agencies that are required to support the children involved or will be involved in any investigation.

If the victim asks the school not to tell anyone about the sexual violence or sexual harassment, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. In this event, the DSL will consider the following:

- parents should normally be informed (unless this would put the victim at greater risk);
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger or has been harmed a referral should be made to children's social care via TRAFFORD'S FIRST RESPONSE
- rape, assault by penetration and sexual assaults are crimes. The starting point is that reports should be passed to the Police.

Ultimately, it is for the DSL (or deputy) to balance the victim's wishes against their duty to protect the victim and other children. If the decision is taken to go ahead and report the incident, the reasons should be explained to the victim and appropriate specialist support offered.

Additional information on confidentiality and information sharing is available from DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers' and 'NSPCC: Information sharing and confidentiality for practitioners'.

We will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment and will carefully consider which staff should know about the report and any support that will be in place for the children involved.

Full consideration will also be given to the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities and the support which may be required by the victim and his/her family should this situation arise.

## **5. RESPONSE TO THE DISCLOSURE**

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on the school environment.

Any response will include:

- a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- treat all children involved as being at potential risk – whilst the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and at risk of harm themselves. We will ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse and the child who has allegedly been responsible for it.

We will take into account:

- that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address any wider contexts such as the child/children's peer group (both within and outside the school); family; the school environment; the experiences of crime and victimisation in the local community; and the child/children's online presence;
- the changes that may need to be made to the above contexts to address the child/children's needs and to mitigate risk;
- the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with all those involved and their parents and obtain consent to any referral before it is made, unless informing the parent will put the child at risk of harm. Any decision not to inform the parents will generally be made in conjunction with other services such as children's social care and/or the Police, who would take the lead in deciding when the parents should be informed.
- the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.



If a pupil is in immediate danger, or at risk of significant harm, a referral to the TRAFFORD'S FIRST RESPONSE (if the pupil is aged under 18) and/or the Police will be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. See Child Protection procedures for additional information.

If a member of staff believes for whatever reason that child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

### **5.1 Internal Management**

Where behaviour between peers is abusive or violent, the incident will be dealt with using methods set out in 5.2-5.4 below. However, where support from local agencies is not available or the incident is considered to be inappropriate or problematic, the school may need to handle allegations/concerns internally. It may be appropriate to handle the incident using the whole school behaviour policy and procedures which includes procedures to be followed in the case of bullying. All concerns, discussions, decisions and reasons for the decisions will be recorded either in writing or electronically. The services of external specialists may be required to support the process.

### **5.2 Early Help Assessment**

Where appropriate and necessary, the school may undertake or contribute to an inter-agency early help assessment with targeted early help services provided to address the assessed needs of a child/children and their family.

### **5.3 Referral to TRAFFORD'S FIRST RESPONSE**

Where a decision is made to make a referral to the TRAFFORD'S FIRST RESPONSE, a strategy meeting is convened, then the school will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it.

### **5.4 Reporting to the Police**

Alleged criminal behaviour will ordinarily be reported to the Police. There are, however some circumstances where it may not be appropriate to report such behaviour to the Police e.g. where the existence of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis and considering the wider context.

## **6. INDIVIDUAL RISK AND NEEDS ASSESSMENT**

Where there is an incident of peer on peer abuse, the school will undertake a robust risk and needs assessment in respect of each child affected by the abuse including the alleged perpetrator. The risk assessment will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term (unless informing the parent will put the child at risk of harm);
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child involved; and
- be reviewed at regular intervals in the light of the child's on-going needs to ensure that progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact the Safeguarding Hub to determine the appropriate course of action.



## **7. SAFEGUARDING AND SUPPORTING THE VICTIM**

The following principles are based on effective safeguarding practice and will help our decision-making process regarding safeguarding and supporting the victim. We will:

- consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse;
- consider the needs and wishes of the victim. The victim will be listened to and acknowledged. It is important they feel in as much control of the process as is possible. Where a pupil feels able to deal with the incident on their own or with support of family and friends, the pupils will continue to be monitored and offered support should they require it in the future;
- ensure that the victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report;
- consider interventions that target a whole class or year group e.g. work on cyberbullying/relationship abuse etc.;
- support the child in improving peer group relationships where bullying is a factor in the abuse and consider restorative justice work with all those concerned;
- ensure that sensitive issues are explored through the use of the curriculum (PSHE and Sex and Relationships Education).

## **8. SAFEGUARDING AND SUPPORTING THE ALLEGED PERPETRATOR**

The following principles are based on effective safeguarding practice and will support our decision-making process regarding safeguarding and supporting the alleged perpetrator. In relation to this we will consider:

- how we will continue to provide the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site. Even following the conclusion of any investigation, the behaviour that the pupil has displayed may continue to pose a risk to others in which case, an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all the agencies involved including the pupil and their parents.
- the age and developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of them being the subject of allegations and/or negative reactions by their peers to the allegations made against them.
- the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviour in young children may be a symptom of either their own abuse or exposure to abusive practices or materials.

Advice will be sought, as appropriate, from the TRAFFORD'S FIRST RESPONSE, the Police and any other agencies or specialist services in order to commission the right support for the child/children concerned.

## **9. SANCTIONS**

Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer on peer abuse and the causes of it.

Sanctions may include additional supervision of the pupil or protective strategies if the pupil feels at risk of engaging in further inappropriate or harmful behaviour.

The school response might include a sanction (in accordance with the Whole School Behaviour Policy and procedures) such as a detention, SLT supervision or fixed-term exclusion to allow the pupil to reflect on their behaviour.

The school will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this Policy may still be required.

A permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of other children in the school or, where the Head teacher, in their absolute discretion, considered the actions of the pupil(s) has damaged the school's ethos or reputation.

Disciplinary interventions alone are rarely able to solve issues of peer on peer abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forward.

## **10. WHOLE SCHOOL APPROACH TO PREVENTION**

Our school's response to peer on peer abuse will not begin at the point at which a child has been abused. We will proactively gather intelligence about issues between pupils which might provoke conflict. This might involve talking to pupils about issues of difference, perhaps in lessons, through dedicated events or

projects, or through assemblies. Staff themselves will be able to determine what will work best for their pupils, depending on the particular issues they need to address. Our school has created an ethos of good behaviour where pupils treat one another and the school staff with respect because they know that this is the right way to behave. That culture extends beyond the classroom to the corridors, the dining hall, the playground, and beyond the school gates including travel to and from school. Values of respect for staff and other pupils, an understanding of the value of education, and a clear understanding of how our actions affect others permeate the whole school environment and are reinforced by staff and older pupils who set a good example to other pupils.

Our school will:

- involve parents to ensure they are clear that the school does not tolerate any form of peer on- peer abuse. We will make parents aware of the procedures to follow if they believe that their child is being abused by their peer or peers. We want parents to feel confident that our school will take any complaint about bullying seriously and resolve the issue in a way that protects the child. We will expect parents to reinforce the value of good behaviour at home;
- involve pupils. All pupils understand the school's approach and are clear about the part they can play to prevent peer on peer abuse, including when they find themselves as bystanders;
- regularly evaluate and update our approach to take account of developments in technology, for instance updating 'acceptable use' agreements for computers and consideration of what can still be improved;
- consider how (if at all) the school's physical environment contributed to the abuse, and how this can be addressed going forward, for example by improving the school's safety, security and supervision;
- ensure that any lessons learnt are acted upon swiftly – were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the school;
- implement disciplinary sanctions. The consequences of peer on peer abuse will reflect the seriousness of the incident so that others see that abuse is unacceptable, will not be tolerated and will be sanctioned;
- openly discuss differences between people that could motivate abuse, such as religion, ethnicity, disability, gender, sexuality or appearance related difference. We will also include children with different family situations, such as looked after children or those with caring responsibilities. We teach children that using any prejudice-based language is unacceptable;

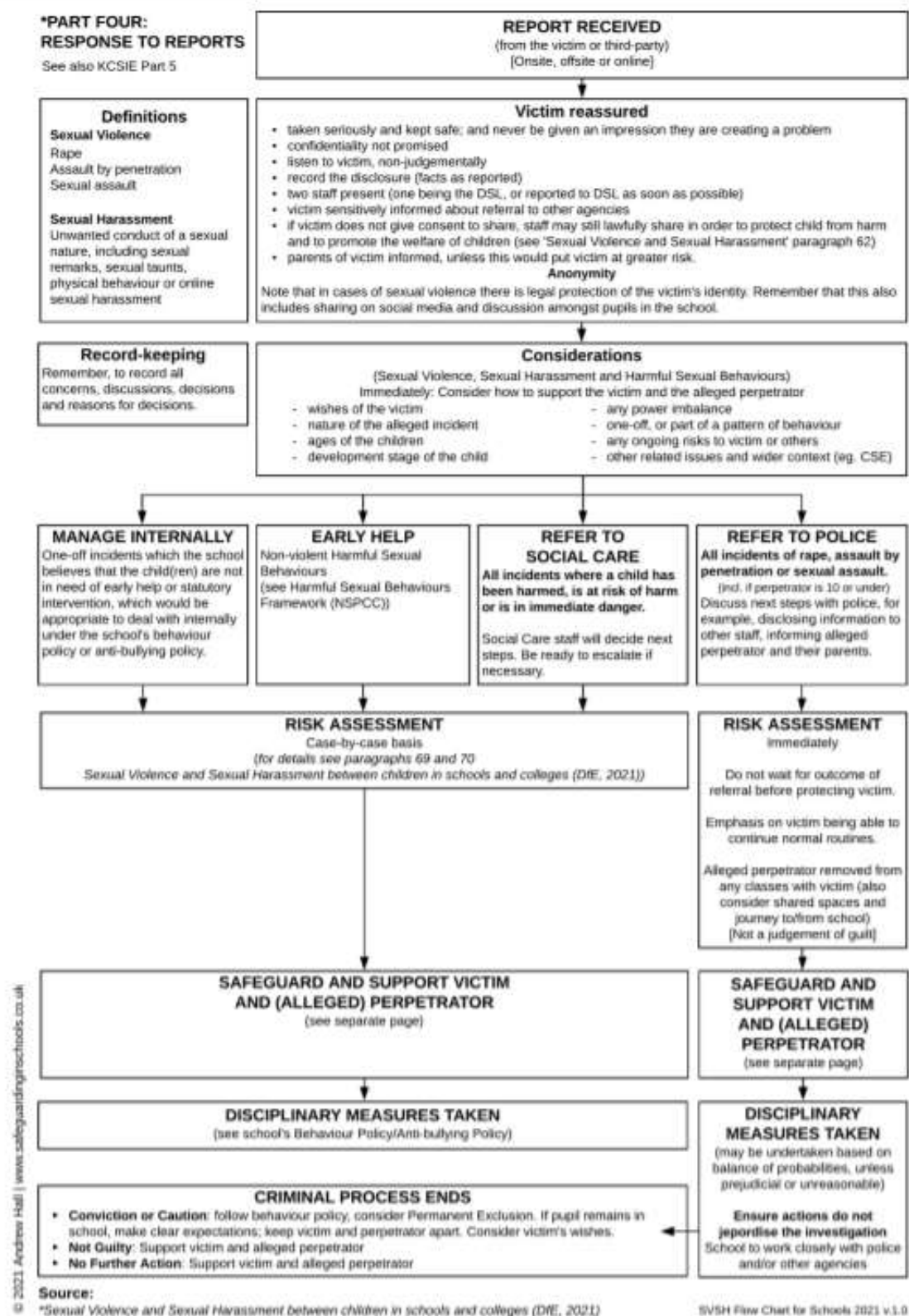
- provide effective staff training on how to deal with peer on peer abuse. All school staff (paid and unpaid) understand the principles and purpose of the school's Policy and procedures, how to resolve and respond to problems, and where and when to seek support from others in the school;
- make it easy for pupils to report bullying of any description so that they are assured that they will be listened to and that incidents will be acted on. Pupils should feel that they can report abuse which may have occurred outside school including cyber-bullying;
- create an inclusive environment where pupils can openly discuss their experiences of peer on peer abuse, without fear of further abuse or discrimination;
- recognise that some children with special educational needs or disabilities may lack the social or communication skills to report peer on peer abuse incidents and we ensure our training builds in regular awareness of this;
- frequently address the impact of abuse within the school and what constitutes appropriate, safe and acceptable behaviour with our children and staff.

## **References**

The following documents were used in the creation of this Policy and procedures and should be read in conjunction with this Policy.

- Keeping Children Safe in Education – September 2021 (DfE)
- Sexual Violence and sexual harassment between children in schools and colleges – May 2018 (DfE)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers – July 2018 (HM Government)
- NSPCC: Information sharing and confidentiality for practitioners – 2015 (NSPCC)
- Working together to Safeguard Children – July 2018 (HM Government)

## Responding to a Sexual Violence / Sexual Harassment Claim:



Filename: Safeguarding Handbook for Schools September 2021 v.12.0.docx

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## Managing allegations and concerns against professionals who work with children

*See KCSIE 2021 Part 4: Section 1 (paragraphs 335 – 405)*

An allegation is any information which indicated that a member of staff (paid, supply or voluntary) may have:

- Behaved in a way that has or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in such a way that indicates they would pose a risk of harm if they worked regularly or closely with a child; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. In regard to a person's conduct outside school, and need not include a child, for example domestic abuse of a partner.

This applies to any child the member of staff has contact with in their personal or professional life.

All staff are reminded of the school's Whistleblowing Policy, which may be found on the shared drive and the staff safeguarding noticeboard or is available from the Executive Headteacher / Headteacher.

Safeguarding or child protection allegations about members of staff must be reported immediately to the Headteacher, or in their absence the Deputy/Assistant Headteacher.

Allegations may be made in a number of ways:

- Direct disclosure by young people
- Indirect disclosure; i.e. through written work or art work
- Complaints to the school from parents/carers
- Complaints to Social Care from parents/carers
- Complaints to Police from parents/carers
- Reports by other colleagues or agencies

Allegations concerning the Executive Headteacher or Headteacher should be referred to the Chair of Governors, using the contacts details set out in the key information section of this policy.

These concerns will be discussed with the Local Authority Designated Officer (LADO) immediately. Where the allegation is against a supply/agency staff, the school is still responsible for contacting the LADO and ensuring the allegation is dealt with properly. Contact details for the LADO for Trafford can be found in Appendix 3.

Initial discussions with the LADO will consider the nature of the allegation and the course of action.

The context in which an incident occurs is crucial to understanding the incident and the definition to be ascribed to it.

In order to differentiate between incidents which are of a child protection nature and those which are more properly dealt with as conduct or competency issues or to identify those allegations which are vexatious, the allegation must be considered in light of the following:

Normal function, environment, expectations and standards applied to the practitioner and with regard to the activity and circumstances in which the alleged incident occurred.

Any physical contact with children and young people could be open to misinterpretation. Perceptions and language again can present very different views of the same incident, particularly where there is or has been earlier disagreement or challenge between the child and the member of staff concerned.

There may be up to 3 strands in the consideration of an allegation:



- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by the organisation of disciplinary action in respect of the individual.

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures

**Where an allegation has been made**, and initial considerations suggest that the incident is likely to have occurred but the behaviour complained of does not reach the threshold for referral to social care and police, the school should investigate the matter internally to determine whether there is need to undertake disciplinary action, or to cease to use the services of the individual, and/or refer the individual's name to the Secretary of State for possible inclusion on the appropriate barring list.

Where a criminal investigation has been undertaken but the police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the school should still investigate the matter and consider whether to apply the school's disciplinary procedures.

**KCSIE 2021: "Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference." (paragraph 401)**

#### Procedures:

The school follows the procedures recommended by the Trafford Strategic Safeguarding Partnership when dealing with allegations made against staff and volunteers.

All allegations made against a member of staff and volunteers, including contractors or security staff working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the child while at the same time providing support for the person against whom the allegation is made.

We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in <https://www.traffordsafeguardingpartnership.org.uk/safeguarding-children-and-young-people/Allegations-Against-Adults-Who-Work-With-Children/allegations-against-adults-who-work-with-children.aspx> and Part 4 of 'Keeping Children Safe in Education', DfE (2021) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO can be contacted via e-mail [anita.hopkins@trafford.gov.uk](mailto:anita.hopkins@trafford.gov.uk) or by phone 912 5024/TRAFFORD CHILDREN'S FIRST RESPONSE 912 5215

If an allegation is made or information is received about any adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Head of School immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Executive Headteacher or Headteacher, this will be reported to the Chair of Governors/Chair of Trust and the LADO. In the event that the Executive Headteacher/Headteacher Chair of Governors/Chair of Trust is not contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors.

The Executive Headteacher/Headteacher or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Executive Headteacher/Headteacher or Chair of Governors should contact the LADO directly on 0161 912 5010

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.