



Safeguarding and Child Protection Policy

Reviewed: September 2023
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Signed by Chair: A Green

Next Review: September 2024

SAFEGUARDING and CHILD PROTECTION POLICY

Vision

St. Mary's Christian Vision

Through God's love and our Christian Values, we encourage each individual to love, respect and value God, themselves and others.

We encourage and nurture everyone to flourish and grow into the unique person God made them to be, ready to go out into the world to love others.

This is rooted in Jesus' words: Love one another as Jesus loved us. (John 13 v 34-35)

1.0 Introduction

At St Mary's CE Primary School, the Governors and staff fully recognise the contribution the school makes to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in protecting pupils from harm. We believe that the school should provide a caring, positive, safe and stimulating environment which promotes all pupils' social, physical, emotional and moral development.

This policy has been devised in accordance with Oldham Local Safeguarding Children's Board (LSCB) guidelines and with the following legislation and guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf (Working Together to Safeguard Children 2018)

'Keeping Children Safe in Education', DfE (2023)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925104/Governance_Handbook_FINAL.pdf (DFE 2020)

<https://www.legislation.gov.uk/ukpga/2002/32/section/175> (Education Act 2002)

<https://www.legislation.gov.uk/uksi/2009/2680/contents/made> (School Staffing, England, 2009)

<https://www.legislation.gov.uk/ukpga/1989/41> (The Children's Education Act 1999)

<https://www.legislation.gov.uk/ukpga/2004/31/contents> (and amendment 2004)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf (Sexual Harassment and violence between children in schools DfE Sept 2021)

<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital> (Guidance for Safer Working Practice Feb 2022)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf (DFE 2015)

'The Prevent duty: Departmental advice for schools and childcare providers', DfE (2015)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf (DFE June 2019)

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

The terms “**must**” and “**should**” are used throughout the policy. The term “**must**” when the person in question is legally required to do something and “**should**” when the advice set out should be followed unless there is good reason not to.

2.0 PURPOSE AND AIMS:

The purpose of St. Mary's CE Primary School's safeguarding policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to:

- Protect children and young people at our school from maltreatment;
- Prevent impairment of our children's and young people's mental and physical health or development;
- Ensure that children and young people at our school grow up in circumstances consistent with the provision of safe and effective care;
- Undertake that role so as to enable children and young people at our school to have the best outcomes.

This policy applies to and gives clear direction to: staff, governors, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.

Our school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our school. The elements of our policy are prevention, protection and support.

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school. We also recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

3.0 ROLES and RESPONSIBILITIES:

Safeguarding and promoting the welfare of children is defined as 'protecting children from maltreatment; preventing impairment of children's 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.' (Keeping Children Safe in Education – statutory guidance for schools and colleges Sept 2023)

Named Personnel with designated responsibility for Safeguarding

Academic Year	Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Nominated Governor	Chair of Governors
2023 - 2024	Pamela Hartley	Steven Day	Andrew Green	Grahame Benson

It is the responsibility of *every* member of staff, governor, volunteer and regular visitor to our school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this school. This includes the responsibility to provide a safe environment in which children can learn.

3.1 The Governing Body

The Governing Body of St. Mary's CE Primary School takes leadership responsibility for their school's safeguarding arrangements.

They are accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Body takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named Governor who champions safeguarding within the school.

The Governing Body will ensure that:

- ensures that the school has a Safeguarding and Child Protection Policy, Staff Conduct Policy and procedures are in place; that this is reviewed annually and is available on our school website;
- they have a named governor for child protection and children looked after: Mr Andrew Green;
- has a member of the governing body nominated to liaise with the local authority on issues of child protection and in the event of allegations of abuse made against the headteacher or member of governing body (A Green or G Benson);
- a member of the senior leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is an alternate and appropriately trained member of staff identified to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role;
- all staff receive a copy of the Safeguarding and Child Protection Policy and the Safer Working Practices Policy / Code of Conduct and Keeping Children Safe In Education part 1 and part 5;
- all staff and Governors undergo regular updated safeguarding training, including online safety with specific guidance on filtering and monitoring and the requirement to ensure children are taught about safeguarding, including online safety. That safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.
- procedures are in place for dealing with allegations against members of staff, supply staff, contractors and volunteers in line with statutory guidance;
- operates safe recruitment procedures and makes appropriate staff, supply and agency staff and volunteer checks and has procedures for dealing with allegations against staff, supply staff, contractors and volunteers that all comply in accordance with Oldham Safeguarding Partnership procedures;
- ensure that school creates a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children;
- ensure at least one member of an appointing panel will have attended safer recruitment training;
- ensures the school keeps an up to date Single Central Record (SCR); are aware of the Prevent Strategy, and understand the Prevent Duty and the responsibilities of the school;
- recognises that neither the Full Governing Body, nor individual governors, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff);
- will ensure this policy and practice complements other policies e.g. Anti-Bullying including cyber bullying, Online Safety, Health and Safety, Relationships, Sex and Health Education, to ensure safeguarding.
- Ensure that the school has an effective filter and monitoring system for online learning and this is regularly reviewed for its effectiveness and meets age appropriate requirements.

3.2 Headteacher

The Headteacher will ensure that:

- the policies and procedures adopted by the Governing Body are followed by all staff;
- the policy will be updated annually, and be available on the school website;
- all staff and volunteers be appropriately trained and a list of their safeguarding training dates is maintained;
- give sufficient resources and allocated time to enable staff to discharge their responsibilities: including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people, and be appropriately trained;
- all staff, supply staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of pupils, and such concerns are addressed in a timely manner in accordance with agreed policies;
- provide copies of policies (including the Safeguarding Policy, Online Safety and Staff Conduct Policy) and a copy of part one and five of Keeping Children Safe in Education to all staff (including those not working directly with children) at induction, including updates when issued;
- ensure all staff understand the role of the DSL and are aware of systems within the school which support safeguarding;
- ensure appropriate filters and appropriate monitoring systems are in place to safeguard pupils from potentially harmful and inappropriate online material;
- ensure staff are aware of the risks to children and young people of being radicalised and provide awareness of Prevent Duty training;
- ensure staff and governors are aware of how to identify and respond to risks to children from extreme or radical views;
- be the identified single point of contact (SPOC) for any Prevent concerns raised within the school;
- refer any child/ren at risk of being radicalised or extremism through the Local Authority Channel Referral and Intervention processes;
- ensure there is a designated person for Children Looked After (CLA): Mrs Pamela Hartley and an up to date list of children is regularly reviewed. There is a named Governor for CLA :Mr Andrew Green;
- liaise with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff;
- ensure safer recruitment practices are followed and has the responsibility of verifying the identity, qualifications, suitability and DBS checks for all staff employed by school, Governors and volunteers;
- ensure a Single Central Record is held in the School Office, and electronically, which includes all members of staff;
- ensure that sub-contracted services (e.g. Music, ICT, Cleaning) include statutory safeguarding procedures for the recruitment of staff in their Service Level Agreement;
- ensure that information is passed to a new school if a child on the Child Protection Register transfers and informs the social worker;
- with the support of the Site Manager, School Business Manager and School Administrator, ensure the safety and security of the school site and screening visitors in regards to the purpose of their visit.
- ensure emergency contact details for more than one parent or designated carer are held in school.
- Ensure the relevant staffing ratios are met in Early Years.

3.3 The Designated Safeguarding Lead (DSL)

The Governing Body appoints the Safeguarding Lead for the school and this is always a senior member of staff.

Mrs Pamela Hartley is the designated lead for child protection.

Mr Steven Day is the deputy designated lead for safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours the DSL can be contacted by email: head@stmaryscecrompton.oldham.sch.uk

The designated safeguarding lead (DSL) takes lead responsibility for safeguarding and child protection (including online safety) in the school. The DSL will understand the filtering and monitoring systems that are in place and ensure all staff receive regular training. The DSL is likely to have the complete safeguarding picture, the status and authority within the school to carry out the duties of the post, which include:

- having the role explicitly defined in their job descriptions;
- being given sufficient time, funding, supervision and support to fulfill their child welfare and safeguarding responsibilities effectively;
- ensuring the designated safeguarding lead undergoes updated child protection training every year; ensuring all staff, including supply teachers, visiting professionals working with pupils in the school and volunteers are informed of the names and contact details of the designated leads and the school's procedures for safeguarding children;
- making staff aware of Oldham Safeguarding Partnership and the latest local safeguarding arrangements including training courses;
- advising and supporting staff on child protection and safeguarding matters;
- supporting staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the school leadership group or others as appropriate;
- encouraging a culture of listening to children;
- liaise with the three safeguarding partners and work with other agencies in line with 'Working Together to Safeguard Children';
- ensure that, if school is named as a relevant agency by the three safeguarding partners (LA, Clinical Commissioning Group and Police), we cooperate fully with published arrangements;
- following the Oldham Safeguarding Partnership procedures when referring a pupil where there are concerns about possible abuse or harm and managing safeguarding referrals to children's social care, the police, or other agencies;
- understand when they should consider calling the police and what to expect when they do using 'When to call the police' - NPCC.
<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>
- taking part in strategy discussions, conference and core group meetings and any other interagency meetings;
- working with children's social care, supporting their assessment and planning processes;
- supporting other staff who attend strategy meetings and/or case conferences;
- ensuring involvement of other designated leads e.g. where there are concerns about a pupil who is 'looked after' or formerly looked after;
- working openly with parents as far as possible. *The school reserves the right to contact children's social care or the police, without notifying parents if this is in the child's best interests.*

- providing a co-ordinated offer of Early Help when additional needs of children are identified; where there are concerns about a member of staff, supply staff or volunteers being involved, contacting the Local Authority Designated Officer (LADO);
- liaising with the “case manager” and the LADO where allegations are made against staff supply staff or volunteers;
- ensuring records of concerns are kept, even if there is no immediate need for referral using the School CPOMs system;
- ensuring all child protection records are marked as such and kept securely using CPOMs and are accessible only to those directly involved with the child;
- ensuring any concerns about attendance and a pupil’s wellbeing and safety, the Education Welfare Officer is contacted. If the pupil has a Child Protection Plan, and is absent without explanation for two days, the Social Worker is contacted. This could be more immediate depending on the case.
- transferring the child protection file to a child’s new school;
- being the identified strategic lead for Prevent within the school;
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training;
- refer any child/ren at risk of being radicalised or extremism through the Local Authority Channel Referral and Intervention processes

‘Keeping Children Safe in Education’. The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child’s safety or welfare will be recorded and logged on CPoms.

The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and relevant training as appropriate.

All Induction for Staff will include a copy of the following policies:

- child protection policy;
- behaviour policy;
- Staff Code of Conduct (Safer Working Practices) the safeguarding response to children who go absent from education; included in Child Protection Policy
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- a copy of part one and part five Keeping Children Safe In Education

All Volunteers Induction will include:

- safeguarding and child protection policy;
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- a copy of part one and part five Keeping Children Safe In Education

The deputy designated safeguarding lead(s) is trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

3.4 Teaching Staff, Support Staff and Volunteers

All staff and volunteers need to be alert to the signs of abuse as detailed in this policy. They should report any concerns immediately to Mrs Hartley, (Mr Day in her absence)

At St. Mary's the responsibilities for teaching, non-teaching staff are:

- understand that all school staff have a responsibility to provide a safe environment in which children can learn;
- maintain an attitude of 'it could happen here'
- adhere to this policy in line with the Behaviour Policy, E safety Policy and Safer working Practice and Staff Conduct Policy.
- to understand the role of the DSL and deputy DSL.
- be aware that to safeguard children, they have a duty to share information with the designated leads, and through the designated lead, with other agencies;
- know that they can make their own referral to children's social care;
- refer to the signs of abuse outlined in the Department Of Education publication '[what to do if you're worried a child is being abused: advice for practitioners](#)' March 2015 - **see Appendix 2 for key extracts**. In addition there is good advice provided on the [NSPCC](#) website.
- knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to a Designated Safeguarding Lead (DSL)
- have an awareness of safeguarding issues. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger;
- know how to respond to their duty when they have concerns or when a pupil discloses to them and to act. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- know what and how to record concern; be aware of Oldham's Early Help process and their role in it.
- undergo child protection training which is updated regularly, in line with advice from the LSCB.
- ensure that curriculum plans provide opportunities for children to develop their skills, knowledge and understanding of safe practices including e-safety.
- know the safeguarding response to children who are absent from education. know that there is a mandatory duty on teachers to report cases of FGM to the police. complete training so that they understand that Prevent is a safeguarding issue, and know how to recognise and refer students who may be vulnerable to radicalisation (the on-line Channel training package at https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html)
- know who to contact within the school if they require advice, support or further training;
- have the skills and confidence to facilitate discussion with children about difficult and contentious issues (such as those relating to extremism);
- understand that Teachers' Standards 2012 state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Volunteers should:

- understand that all school staff have a responsibility to provide a safe environment in which children can learn;
- maintain an attitude of ‘it could happen here’
- adhere to this policy in line with the Behaviour Policy, E safety Policy and Safer working Practice and Staff Conduct Policy.
- to understand the role of the DSL and deputy DSL.
- be aware that to safeguard children, they have a duty to share information with the designated leads, and through the designated lead, with other agencies;
- know that they can make their own referral to children’s social care;

4. WHAT SCHOOL STAFF SHOULD LOOK OUT FOR

All staff are reminded that they should be aware that children may not feel or know how to tell someone they are being abused, exploited, or neglected – or they can recognise their experiences as harmful.

4.1 Types of abuse

Extract from Keeping Children Safe in Education – Statutory guidance for schools and colleges –

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone 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. They may be abused by an adult or adults or another child or children.

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

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

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

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

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children 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, and serious youth violence.

OPERATION ENCOMPASS

St Mary's School is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.

Operation Encompass means that the police will share information about Domestic Abuse incidents with our school *prior* to the start of the next school day when they have been called to a domestic incident.

The Designated Safeguarding Lead – (DSL) has attended an Operation Encompass briefing and has cascaded the principles of Operation Encompass to the Deputy Designated Safeguarding Leads.

The Key Adults are: Mrs Pamela Hartley and Mr Steven Day

Parents are aware that we are an Operation Encompass school and have been informed by letter.

The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

The Key Adult has also led training for all school staff and has informed Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed, as a school, how we can support our children following the Operation Encompass notification.

We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

The Headteacher and/or Safeguarding Governor provide safeguarding updates at the Full Governing Body meetings and provides an annual report to Governors. All information is anonymised.

The DSL has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school and will complete an action report following any incident and upload this information to CPoms. (See appendix 1 for the report and links to additional advice)

4.2 Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately absent from education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

4.2.1 Child on child abuse:

ALL staff must be aware that safeguarding issues can manifest themselves via child on child abuse and this can happen both inside and outside of school and online. Staff are aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. All child on child abuse is unacceptable and will be taken seriously, we have a zero tolerance to abuse.

Child on child abuse can take many forms and is likely to include, but may not be limited to:

- **bullying** -(including cyberbullying prejudice-based and discriminatory bullying);
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- ***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 stand-alone or part of a broader pattern of abuse;
- **Sexting** - including pressuring another person to send a sexual imagery or video content. Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
- **abuse in intimate personal relationships between peers** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- **initiation/hazing** - this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- ***upskirting** - which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission 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. This is a criminal offence. Anyone of any gender can be a victim*
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

** (For further information see Annex B of KCSIE 2022)*

Staff must challenge any form of derogatory and sexualized language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. Behaviours by children should never be passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

The DFE states 'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.'

Child on Child Sexual Violence and Sexual Harassment

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBT children are at greater risk. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
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- Staff also need to be aware that a child displaying harmful sexual behaviour (HSB) may be an indication that they are a victim of abuse themselves.

Staff also need to be aware that a child displaying harmful sexual behaviour (HSB) may be an indication that they are a victim of abuse themselves.

Prevention of any child on child abuse

As a school we will minimise the risk of allegations against other pupils by:-

- having an open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them;
- providing a developmentally appropriate PSHE syllabus which develops children understanding of acceptable behaviour and keeping themselves safe;
- staff will endeavour always to create surroundings where everyone feels confident and at ease in school;
- having systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued;
- collective worship is used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying;
- delivering targeted work on assertiveness and keeping safe to those children identified as being at risk;
- developing robust risk assessments & providing targeted work for children identified as being a potential risk to other children

- we will ensure that the school is well supervised, especially in areas where children might be vulnerable

Procedure Information gathering

- When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the designated safeguarding lead (DSL) should be informed.
- A factual record should be made of an allegation, but no attempt at this stage should be made to investigate the circumstances (this should be logged on CPoms)
Children, staff and witnesses should be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm. We will try to manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible. All concerns, discussions, decisions and reasons for decisions should be recorded (on CPoms).
- All concerns should be referred to the Designated Safeguarding Lead (DSL) , and logged on CPoms and the DSL should also refer to the School's Anti Bullying Policy.
- Victims of child on child abuse should be supported by the school's pastoral system and referred to specialist agencies including, as examples, CAMHs, Barnardos, Social Care, Sexual Violence Specialists. A written risk assessment may also need to be in put place and reviewed regularly.
- Perpetrators of child on child abuse will follow the same procedures as outlined in the Anti Bullying Policy

Decide on action

There are four likely scenarios to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, school will decide on a course of action. Consideration will be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training should be delivered to minimise the risk of it happening again.

The four scenarios are:

1. Manage internally
2. Early help
3. Referrals to children's social care
4. Reporting to the Police

- The DSL should contact the MASH to discuss the case.
- The DSL will follow through the outcomes of the discussion and make a referral where appropriate.
- If the allegation indicates that a potential criminal offence has taken place, the DSL will refer the case to the multi-agency agency safeguarding hub where the police will become involved. It should be explained to the pupil that the law is in place to protect children and young people rather than criminalise them.
- The DSL will make a record of the concern, the discussion and any outcome on CPoms.
- It may be appropriate to exclude the child being complained about for a period of time according to the school's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

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

4.2.2 Self-Harm

If it comes to the attention of a member of staff that a child is self-harming, they should alert the DSL as soon as possible, who may take action by contacting the following:

- Parents or carers;
- Child Mental Health Services;
- Social Services, if the child meets the referral criteria;

4.2.3 Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's *Preventing youth violence and gang involvement* and its *Criminal exploitation of children and vulnerable adults: county lines guidance*

4.2.4 Female Genital Mutilation

All school staff are aware of the range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines – (see Appendix 3 for relevant extract.)

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

4.2.5 Forced Marriage

Forced Marriage became a criminal offence in June 2014. It is a form of child, adult and domestic abuse and, in line with statutory guidance, is treated as such by the School. The School is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. However, 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 this policy will be followed to protect a victim or potential victim of forced marriage. If a case of forced marriage is suspected it will be viewed as a safeguarding and child protection concern, and parents and carers will not be approached or involved about a referral to any External Agency. (Refer also to 'honour-based abuse, outlined in Annex B of KCSIE 2022)

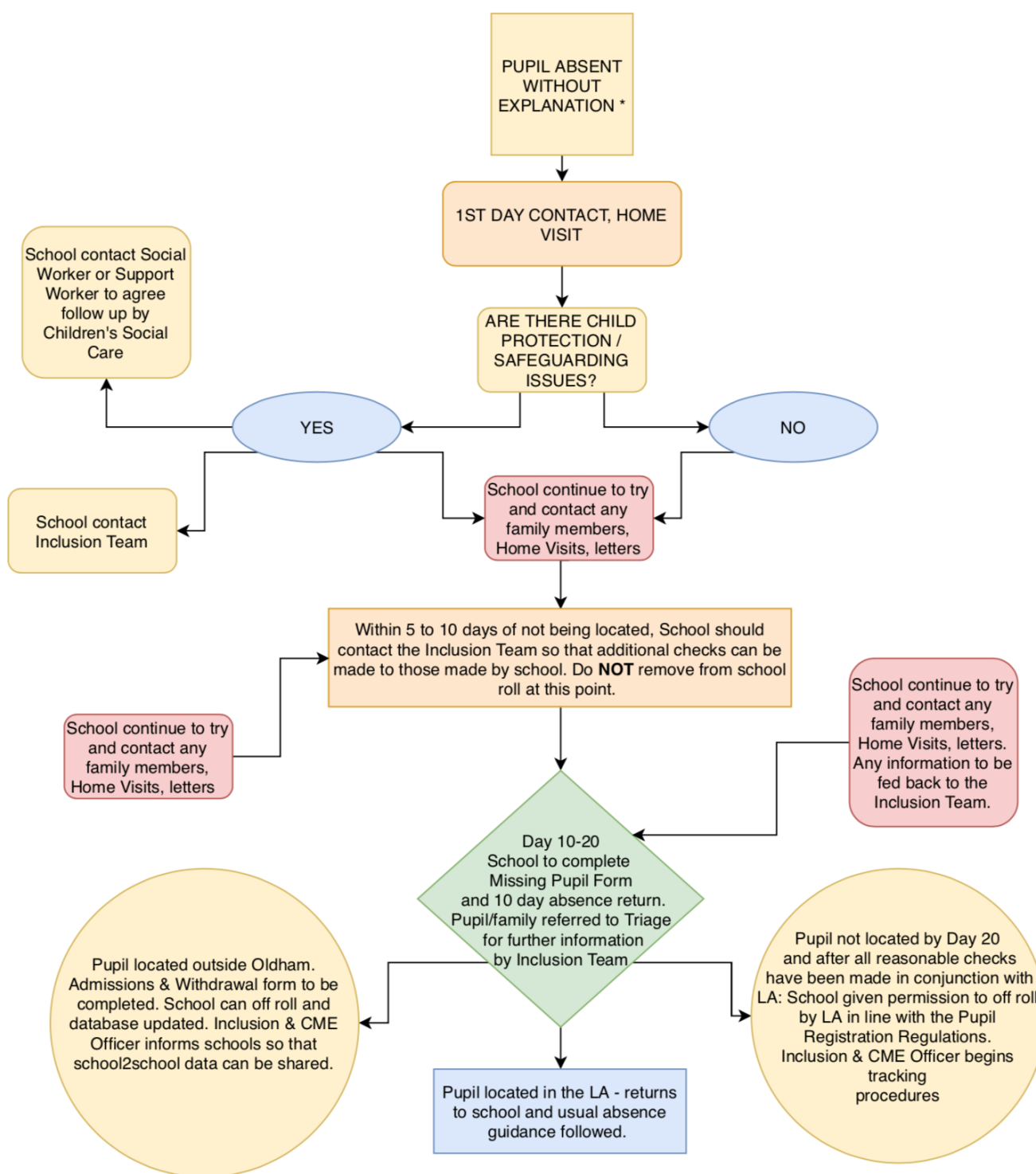
4.2.6 Children Absent From Education

Children who are absent from education

All measures are taken to monitor attendance and provide guidance to all staff when a pupil is absent from education. A child being absent from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School staff should follow our procedures for unauthorised absence and for dealing with children that are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of being absent in future. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. If a child is failing to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days, then the local authority will be notified of the absence.

The local authority will be notified when a pupil is deleted from the admission register / school register.

Guide to actions for a pupil whose whereabouts are unknown (Missing Pupils)



** Early Help assessment / Social Care Referrals should also be considered when pupils have absences from school.*

Following the completion of the above the Access Service will undertake the task of 'tracking' the pupil. This will include checks on benefits /council tax/ health etc as well as contacting other boroughs. It is essential that the above process is completed before the absent pupil form is sent in.

Vulnerable Groups Officer (CME team) are on 0161 770 4201/3665 cme@oldham.gov.uk

Education Attendance Service (EAS team) are on 0161 770 6620 sais@oldham.gov.uk

4.2.7 Radicalisation/Extremism

The identified strategic lead for Prevent is the DSL and this is the single point of contact (SPoC) for the school.

What is extremism? - Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism: calls for the death of members of our armed forces, whether in this country or overseas. (Keeping children safe in education – Statutory guidance for schools and colleges Sept 2019) Extremism can be both violent and non-violent.

What is radicalisation? - Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. (Keeping children safe in education – Statutory guidance for schools and colleges Sept 2022)

The link between radicalisation/extremism and safeguarding - Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. As with managing other safeguarding risks, staff should be alert to changes in student's behaviour which could indicate that they may be in need of help or protection. If staff have any concerns about a young person's safety they should speak to a Designated Lead.

Procedures in place for protecting students at risk of radicalisation

Teaching British Values within the curriculum

We teach a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life. We actively promote community cohesion and British Values across all curriculum areas including RE, RSE and English.

Visiting speakers

All visiting speakers that visit school should be fully checked to ensure they are suitable. All staff who wish to invite visiting speakers into school must get permission from the Headteacher or Deputy Headteacher who will ensure necessary checks are carried out. All visiting speakers must be supervised by at least one member of school staff.

After School Activities

All afterschool activities and groups must have approval from the Headteacher or Deputy Headteacher, and have relevant certificates of training and/or qualifications and DBS checks.

ICT

Our internet controls in school ensure all students are safe from terrorist and extremist material when accessing the internet in school.

Our E-safety education with pupils, parents and staff includes the risks of online radicalisation.

Staff Training

Understanding the risk factors and signs of radicalisation is part of the ongoing safeguarding training of all staff and is updated regularly. The Designated Safeguarding Lead(s) have had Prevent Awareness Training

(WRAP) and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Where we have concerns

If we have safeguarding concerns regarding a young person the Designated Safeguarding Leads will make an appropriate referral. This could include a referral to Channel or Children's Social Care. Where appropriate or necessary escalation to the Police will take place. The same procedures would apply if the concern related to a parent, member of staff or Governors. In these instances a referral would be made to Channel, the LA/Diocese, and Social Services.

The contact details for referrals are

Children:child.mash@oldham.gov.uk

Adults:adult.mash@oldham.gov.uk

Duty and Advice Team (MASH) Tel 0161 770 7777

Or GMP Prevent office on 0161 856 6345.

Where any concerns are raised about radicalisation/extremism whether for a child or adult a referral must be completed using CPoms.

Should a referral be made then an investigation/reflection will follow to identify and respond to lessons learnt.

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

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

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

(See Appendix 4 for further information and support).

Attendance is closely monitored and all staff understand that pupils who are absent from education are potentially vulnerable to CSE and CCE and therefore should be reported to the Safeguarding Lead

4.2.9 Elective Home Education (EHE)

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision.

However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, school will, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

4.2.10 On-line Safety

- The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. At St. Mary's we have an effective approach to online safety which educates the whole school community in their use of technology and we have robust systems in place to identify, intervene in and escalate any incident as appropriate.
- At St Mary's we recognise that there are three main areas which can place our pupils at risk:
 - content: being exposed to illegal, inappropriate or harmful material;
 - contact: being subjected to harmful online interaction with other users; and
 - conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- **To meet our aims and address the risks above we will:**
- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.
- Educate parents/carers about online safety via our website and twitter. and how to raise concerns about any online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example :
 - Staff are allowed to bring their personal phones to school for their own use, but to use in non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 3 key categories of risk (described above) from the school's IT systems
Staff are regularly updated and undergo safeguarding training including, online safety training with specific guidance on filtering and monitoring.

Filtering and Monitoring

To ensure that the school has effective monitoring and filtering systems in place we

- identify and assign roles and responsibilities to manage filtering and monitoring systems (see roles and responsibilities)
- review filtering and monitoring provision at least annually (*See note below).
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

**Governing bodies alongside the IT technician will refer to the guidance published by the DfE [Filtering and monitoring standards](#) and additional guidance: [Appropriate Filtering and Monitoring - UK Safer Internet Centre](#) to review the effectiveness of the filters in place and standards and provide leaders with any further actions.*

The link below may also be used to assist in the monitoring of the systems in place

[Test Your Internet Filter / SWGfL Test Filtering](#)

Please refer to our online safety policy and safer Working Practices.

The e- safety policy also gives further information with regard to sexting. Sexting is where young people share sexual images of themselves. Where this happens, images have usually been shared with a partner or intended partner as a form of flirtation or - in the eyes of the young person - 'safe sex'.

This act itself poses a risk to the young person in the image: once it has been shared it is liable to be distributed further. This action may also place both the sender and the recipient in a position of having committed an offence under the Protection of Children Act 1978. Young people of an age likely to consider such actions should be educated about the risks. In the event of sexting Child Protection procedures should follow.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate). If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded and logged on CPOMS.

Curriculum coverage

Pupils are taught about safe relationships on line.

Education at home

Where children are being asked to learn online at home staff have paid due diligence to the guidance outlined in the link below

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

In addition the school website directs parents to further information on how to keep pupils safe including the following websites:

www.thinkuknow.co.uk

www.saferinternet.org.uk

www.internetmatters.org

Other safeguarding risks

In addition to being vigilant of the all signs of neglect, sexual abuse and child exploitation, physical abuse and emotional abuse (see appendix 2) all staff should also understand the risks presented by:-

- Children missing from home or care
- Children absent from education
- Child sexual exploitation
- Bullying including cyber bullying
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender based violence/violence against women and girls
- Mental illness
- Private fostering
- Sexting
- Teenage relationship abuse
- Trafficking

Further information on these issues can be found on the [NSPCC](#) website and via the GOV.UK website.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

5.0 Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- living away from home or in temporary accommodation;
- living in chaotic and unsupportive home situations;
- living transient lifestyles;
- affected by parental substance misuse, domestic violence or parental mental health needs;
- vulnerable to being bullied, or engaging in bullying;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, sexuality or gender identity;
- do not have English as a first language;
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

5.1 Mental Health

School has an important role to play in supporting the mental health and wellbeing of our children.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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.

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

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

Staff should follow our Emotional Health and Mental Wellbeing Policy and follow our systems and processes for identifying possible mental health problems, including routes to escalate and making referrals.

Further resources and information to support staff and pupils can be found in appendix 5

5.2 Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. The school treats pupils with SEND with the same degree of professional concern accorded to non-SEND children. This means that safeguarding arrangements need to take into account a pupil's specific needs e.g. as set out in their education, health and care (EHC) plans.

Staff should recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child).
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled child's understanding of abuse.
- Lack of choice/participation
- Isolation

It is particularly important that staff are aware of the different ways in which pupils with SEN or disabilities might try to express that something is wrong. For example, pupils (especially those who are non-verbal) may try to communicate a problem through art or music therapy, or sign language. For other pupils, changed or inappropriate behaviour may indicate that something is wrong. It is therefore important that staff know pupils well and are alert to these signs to ensure that problems are identified. Staff should also take into account what other pupils say about a pupil with SEN or a disability, as well as any known changes in a child's home circumstances

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

5.3 Children with a social worker

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

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

5.4 Children Looked After and Previously Looked After

We understand that the most common reason for children becoming looked after is as a result of abuse and/or neglect.

The designated teacher for Children Looked After is Mrs Pamela Hartley.

The designated teacher will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. We will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will also have details of the child's social worker and the name of the virtual school head in Oldham Local Authority that looks after the child, or other neighbouring authority.

We also ensure staff feel confident regarding safeguarding previously looked after children and they know who to seek advice and support from.

6.0 Discriminatory Behaviour

All governors and staff recognise our duties under the Equality Act 2010 to:

- eliminate discrimination, bullying and harassment aimed at protected characteristics as defined in the Act.
- promote equality of access and opportunity within our school and within our wider community.
- promote positive attitudes to difference and good relationships between people with different backgrounds, genders, cultures, faiths, abilities and ethnic origins.

Repeated incidents that involve discriminatory behaviour or a single serious incident may lead to consideration under child protection procedures.

7.0 CHILD PROTECTION PROCEDURES

Our school procedures for safeguarding children are in line with Oldham LSCB child protection procedures.

7.1 How staff should respond to a child protection concern

Any member of staff, volunteer or visitor to the school who receives a disclosure of abuse, an allegation or suspects that the abuse may have occurred must report it immediately to the appropriate Designated Safeguarding Lead. This initial concern should be done immediately verbally and then be followed up by a written statement on Cpoms.

All staff can make referrals of suspected abuse to the appropriate Local Authority Children's Social Care or police if they feel this is necessary.

7.2 Early Help

All school staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years onwards. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care

for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

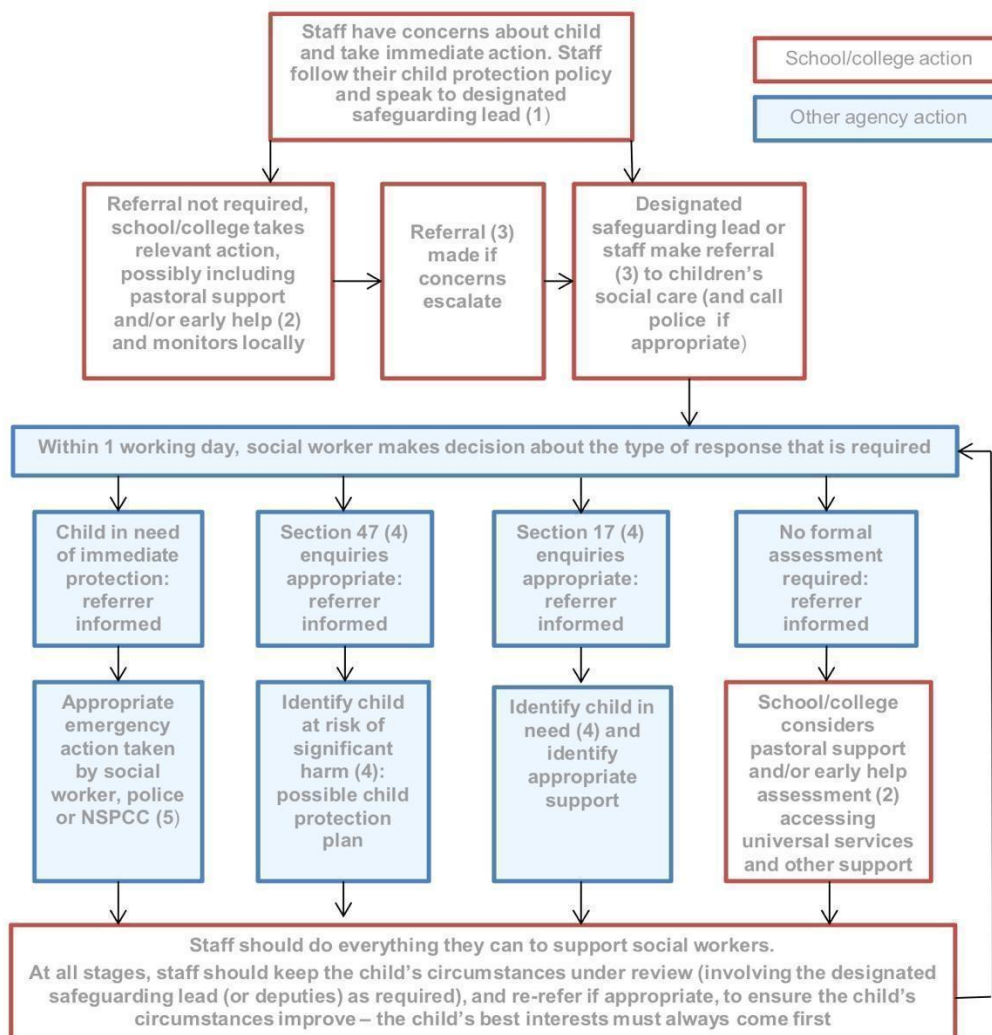
Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- 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
- is frequently missing/goes missing from care or from home
- is repeatedly absent from education or absent for prolonged periods of time
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- 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 a privately fostered child

7.3 Actions of the Designated Safeguarding Lead

The Designated Safeguarding Lead will assess any child protection concerns using the following flow chart from 'Keeping Children Safe in Education. 2023'

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

If it is decided that a referral is necessary the Safeguarding Lead will immediately refer cases of suspected abuse or allegation to the Multi-Agency Safeguarding Hub (MASH team) on tel: 0161 770 7777. A telephone referral should be followed by a written record of the referral which will be emailed to the MASH team (using the LSCB multi-agency referral form) as soon as possible and within the school day.

<http://www.oldham.gov.uk/lscb/info/4/referralsandassessments>

If students are from out of borough then the relevant Social Services Safeguarding Team will be contacted.

7.4 Sharing information with parents

The school will always undertake to share information with parents/carers where there is an intention to refer a child to statutory services unless to do so could place the child/ young person at greater risk or harm or impede an investigation by statutory services. (See LSCB Guide to ‘Making a Child Protection Referral’)

8.0 WHAT TO DO IF A PUPIL TALKS TO YOU ABOUT ABUSE

It should be recognised that a child or young person may seek you out to share information about abuse or neglect, or talk spontaneously individually or in group when you are present. In these situations you should:

- Listen carefully to the student; do not directly question them.
- Allow the pupil the time to give an account; do not stop a pupil from recalling events.
- Make an accurate record of concerns by logging into CPoms and reporting the incident.
- Reassure the student that they were right to tell.
- Explain that you cannot promise not to speak to others, but will only pass on the information to those who need to know.
- Pass the concern directly to the Designated Safeguarding lead.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral.

9.0 RECORD KEEPING

Any members of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event in context, and stating the date, time and location. All records of concerns or disclosures of abuse should be made by logging the cause for concern as an incident on CPoms. If it is an observation of bruising or an injury try to record detail, e.g. “right arm above elbow” **Do not take photographs!** Actions from the safeguarding lead will then be added.

All safeguarding records are kept confidentially, securely and chronologically.

An indication of further record keeping is marked on pupil records.

If a pupil transfers from the school those files will be copied and forwarded within five working days to the pupil’s new school, marked confidential and for the attention of the receiving school’s designated safeguarding lead person, or transferred securely via CPoms, if the receiving school is using this system.

Confidentiality

The personal information about all pupils’ families is regarded by those who work in this school as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality. Confidentiality and Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

10.0 OPPORTUNITIES TO TEACH SAFEGUARDING

As part of providing a broad and balanced curriculum we teach all pupils about safeguarding. This is done through a range of subjects including PSHE, RSE and ICT. This includes teaching pupils about responsible and safe use of the internet and social media. It also includes guidance and support on developing healthy relationships. As part of developing a healthy, safer lifestyle, pupils are taught to, for example:

- safely explore their own and others' attitudes.
- develop a trusting climate so that children feel able to talk and share their thoughts and feelings.
- recognise and manage risks in different situations and how to behave responsibly.
- judge what kind of physical contact is acceptable and unacceptable.
- recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure.
- including knowing when and where to get help.
- E-Safety.

11.0 TRAINING AND SUPPORT

The Headteacher and all other staff who work with children will undertake appropriate child protection awareness training to equip them to carry out their responsibilities for child protection effectively, that is kept up to date by refresher training at 'regular' intervals as set out in "Keeping Children Safe in Education". All staff must read part one of Keeping Children Safe in Education

The school will ensure that the designated persons undertake refresher safeguarding training every two years to keep knowledge and skills up to date. In addition they will also keep up to date through networks and bulletins.

All staff (including governors) will receive child protection/safeguarding training when first appointed as part of their induction.

We recognise that staff working in school who may have become involved with a child who has suffered harm or appears likely to suffer harm may find the situation upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support if required.

12.0 ALLEGATIONS AGAINST A MEMBER OF STAFF, SUPPLY STAFF, VOLUNTEER OR CONTRACTOR

There is an LSCB procedure for investigating allegations which may indicate a person would pose risk of harm¹ if they continue to work in regular or close contact with children in any capacity in school.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, then:

- this should be referred to the headteacher;
- where there are concerns/allegations about the headteacher, this should be referred to the chair of governors,

¹ The harm test is explained further on the Disclosure and Barring service website on <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

Issues of concerns reported to the Headteacher or the Chair of Governors should contact the Local Authority Designated Officer (LADO) TEL: 0161 770 8870.

Action must be taken where it is alleged that anyone working in the school, including supply teachers and volunteers has:

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

Schools as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended

(Refer to section 4 of Keeping Children Safe in Education 2022 for further detailed guidance)

There are two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to as **‘low level concerns’**.

Low-level concerns about members of staff, volunteers or contractors

A low-level concern is a behaviour towards a child by a member of staff, volunteer or contractor that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a ‘nagging doubt’. For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can’t easily be seen
- Humiliating pupils

Low-level concerns can include inappropriate conduct inside and outside of work.

All staff should share/ report any low-level concerns to the DSL. If the concern is about the DSL then the Chair of Governors this should be recorded in writing. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

If the DSL/ Chair of Governors are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO

All reports will be handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police. This is also applicable to supply staff and volunteers.

Allegations against supply staff and contractors

In some circumstances school will have to consider an allegation against an individual not directly employed by us, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or contractors.

Whilst school is not the employer of supply teachers and teaching assistants or contractors, we will ensure allegations are dealt with properly. School will not decide to cease to use an individual member of supply staff or contractor due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. We will discuss with the agency or employer whether it is appropriate to suspend the supply teacher or teaching assistant or contractor, or redeploy them to another part of the school, or suspend work, whilst they carry out their investigation.

School should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers and teaching assistants and contractors, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support.

The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency or company, school will inform the agency/ company of its process for managing allegations. This includes inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

13.0 SAFER WORKING PRACTICE

Abuse of position of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff 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 pupil under 18 may be a criminal offence.

Staff/pupil online relationships

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or allegation investigation

We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document “Guidance for Safer Working Practice for Adults who work with Children and Young People” provides advice on this and circumstances which should be avoided in order to limit complaints against staff of abuse, and/or allegations of physical or sexual abuse. These matters are referred to in the School’s Safer Working Practice Policy.

This school is committed to safer recruitment and the suitability of all staff at the school. The Headteacher and Governors have undertaken approved safer recruitment training in line with statutory requirements.

School ensures that there is safe practice followed in checking the suitability of staff to work at the school. All school staff, Governors and volunteers have undertaken an enhanced DBS check. School ensures that visitors or contractors who visit the school premises are appropriately ‘risk assessed’. The identity of visitors/contractors are checked on arrival. School seeks assurances from employers that visitors/contractors have undergone a DBS check where appropriate, and for those for whom a DBS check has not been undertaken, are supervised.

If school has concerns about a member of staff (including supply staff, volunteers and contractors) suitability to work with children, school will carry out all relevant checks as if the person were a new member of staff. School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

Under the regulations in the Disqualification from Childcare Act 2018, schools are no longer required to establish whether a member of staff providing, or employed to work in, childcare is disqualified by association. Regulation 9 does not apply to staff in a school setting; disqualification by association is only relevant where childcare is provided in domestic settings (e.g. where childminding is provided in the home) or under registration on domestic premises. Accordingly, we will not ask staff questions about cautions or convictions of someone living or working in their household.

However in support of this amendment we will take every opportunity to create the right culture and environment so that staff feel comfortable, where it is appropriate, to discuss matters outside of work, which may have implications for the safeguarding of children in the workplace. For example through appraisal, or other staff discussions. Staff should feel able to discuss issues where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in school. These discussions will help us to safeguard our employees’ welfare and contribute to our duty of care towards our staff. Where appropriate, it will help us to identify whether arrangements are needed to support these staff. These discussions can also help us to manage children’s safety, providing them with information that will help them consider whether there are measures that need to be put in place to safeguard children (e.g. by putting arrangements in place to stop or restrict a person coming into school where a potential risk to children has been identified). The school will always refer to the Lado where there is any cause for concern or need for further advice.

Photographing and Videoing

The school has a school photography policy statement which outlines for staff and parents the school policy with regard to the taking of photographs and digital images. Staff are only permitted to take photographs in 'school or educational provision settings' and may only use school approved cameras and/or media. Full parental consent is sought at the beginning of each year for their child to be photographed or videoed for school purposes, publicity and/or use on the school web site. Parents are permitted to take photographs at school events such as Nativity performances and Sports Day but are reminded of their responsibilities with regard to their safe use and circulation.

14.0 WHISTLEBLOWING

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

Any initial concerns should be raised with the school's senior leadership team (SLT). Where a staff member feels unable to raise an issue with the SLT or feels that their genuine concerns are not being addressed, should refer to the school's whistleblowing policy.

The NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

15.0 Safer Recruitment

Our school complies with the requirements of Keeping Children Safe in Education (DfE 2022) and Oldham Safeguarding Partnership by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school has adopted Oldham Council's Staff Recruitment policy and procedures.

- A section 128 direction will show on an enhanced DBS check with barred list information.
- Governors will have a section 128 check.
- The Teaching Regulation Agency will be used to verify any award of qualified teacher status (QTS) and the completion of teacher induction or probation periods.
- We ensure that a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the secretary of state, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.
- Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools must make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:
 - criminal records checks for overseas applicants, and for teaching positions;
 - obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked.
- Where available, such evidence will be considered together with information obtained through other pre-appointment checks to help assess their suitability. Where this information is not available to schools we will seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Although sanctions and

restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, school will consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.

- When any information about past disciplinary action or allegations is disclosed through references, it will be considered as part of the suitability assessment.
- The school maintains a single central record of recruitment checks undertaken. The Single Central Register is in paper and electronic format.
- Trainee teachers will be checked either by the school or by the training provider, from whom confirmation will be obtained.
- The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked.
- At least one member of each recruitment panel will have attended safer recruitment training.
- On line searches on shortlisted candidates will be carried out and any information that is publically available maybe explored during an interview, candidates will be informed of this due diligence.
- We will refer to the DBS when someone is suspended or moved out of regulated activity to another post, if they meet the 'harm' criteria.
- We will record risk assessments when deciding whether to get an enhanced DBS check for any volunteer not engaging in regulated activity.
- Should our school need to place a pupil with an alternative provision provider, we will continue to be responsible for the safeguarding of that pupil, and should be satisfied that the provider meets the needs of the pupil. We will get written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Copies of documents to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file.

16.0 Work Experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education (2022).

17.0 Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

18.0 Site security

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

19.0 Use of school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential visits, we will check that effective child protection arrangements are in place.

If an allegation relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children (for example community/ church groups, sports associations or service providers that run extra-curricular activities). School will follow our safeguarding policies and procedures, including informing the LADO, outlined under the section managing allegations.

20 .0 LINKS TO OTHER POLICIES

This policy should be read in conjunction with other related school policies and procedures:

- Anti-Bullying Policy
- Behaviour Policy, including violence and aggression
- First Aid and Medicine Policies
- Health and Safety Policy
- Relationships Sex Education Policy
- Safer Working Practices / Code of Conduct Policy
- Single Equality Policy
- E- Safety Policy ([which includes DFE guidance Teaching Online Safety June 2019](#))
- Confidentiality Policy
- EVC Policy
- Whistle Blowing Policy
- Lockdown Policy
- Intimate Care Policy
- SEND Policy
- Missing Children Policy
- Emotional Health and Wellbeing Policy

This policy will be reviewed on an annual basis or earlier if legislation should change

21 .0 DATA PROTECTION – Managing and Storing Information

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. However, in a situation where a child is in a refuge, this could mean that schools can withhold education data under the GDPR, where the serious harm test is satisfied. (See ICO).

The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.

All documents stored are in accordance with legal requirements where appropriate, and guidance from the Records Management Toolkit for Schools.

- a) All safeguarding records are kept confidentially and securely on CPoms
- b) If a pupil transfers from the school those files will be copied and forwarded within five working days to the pupil's new school marked confidential and for the attention of the receiving school's designated safeguarding lead person or sent securely via CPoms
- c) All safeguarding records for pupils will be retained for DoB +25 years and then securely disposed (documents must be deleted)

d) Any allegations against staff will be retained until the staff member retires or 10 years from the allegation. Any malicious allegations must be removed. All documents should be securely disposed (documents must be shredded)

Reference should be made to each related policies for specific details on how information is managed and store in this area.

This policy:

Has Few / No Data Compliance Requirements	Has A Moderate Level of Data Compliance Requirements	Has a High Level Of Data Compliance Requirements
		✓

Appendix 1



Child's name, age & DOB			
Police Reference Number		Date:	
Date and time of incident Address of incident			
<u>Circumstances of incident</u>			
<u>Additional school information including other Operation Encompass calls</u>			
<u>Actions taken and Impact</u>			

Appendix 2

Definitions and signs of Abuse

(Extracts from Department Of Education publication ‘what to do if you’re worried a child is being abused: advice for practitioners’ March 2015)

There are a number of warning indicators which might suggest that a child may be being abused or neglected.

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don’t want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly absent from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners’ concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

Some of the following signs may be indicators of physical abuse:

- children with frequent injuries;
- children with unexplained or unusual fractures or broken bones; and
- children with unexplained:
 - bruises or cuts;
 - burns or scalds; or
 - bite marks.

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

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). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are

persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and/ or absent from education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who are regularly absent from school or education or don't take part in education

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development.

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify.

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

Appendix 3

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

CHAPTER THREE

IDENTIFYING GIRLS AND WOMEN AT RISK

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl or woman being at risk of FGM, or already having undergone FGM. **There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.**

Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.5 for the nationalities that traditionally practise FGM.

Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant.

Professionals should also note that the girls and women at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

3.1 SPECIFIC FACTORS THAT MAY HEIGHTEN A GIRL'S OR WOMAN'S RISK OF BEING AFFECTED BY FGM

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

3.2 INDICATIONS THAT FGM MAY BE ABOUT TO TAKE PLACE SOON

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that **FGM happens to British girls in the UK as well as overseas** (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.

- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it (See Appendix B for commonly used terms in different languages).
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent (see Section 2.5 for the nationalities that traditionally practise FGM).
- Parents seeking to withdraw their children from learning about FGM.
- from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

3.3 INDICATIONS THAT FGM MAY HAVE ALREADY TAKEN PLACE

It is important that professionals look out for signs that FGM has already taken place so that:

- the girl or woman affected can be supported to deal with the consequences of FGM (see Sections 2.10 and 2.11).
- enquiries can be made about other female family members who may need to be safeguarded from harm.
- criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has already been subjected to FGM:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away

Appendix 4

Tackling Child Sexual Exploitation (CSE and CCE)

Key messages

1. Child Sexual Exploitation (CSE) happens in all communities, including Oldham.
2. Most sexual exploitation happens within families, and broader family and friend networks.
3. A majority of perpetrators in recent high profile cases are of Pakistani heritage, other communities are also represented. Nationally, most perpetrators of child sexual exploitation are of White British origin.
4. Oldham has a number of nationally recognised support services– Messenger, ROSE and KOGS.
5. If you have any concerns, please contact the Multi Agency Safeguarding Hub (MASH) on (0161) 770 7777 or contact the Police directly.

What is Child Sexual Exploitation?

- Child Sexual Exploitation is a form of abuse of children and young people where the victim is given something – such as food, money, drugs, alcohol or gifts - in exchange for sexual activity with the abuser. Offenders target vulnerable young people and use their power over the child or young person - physical, financial, emotional etc. - to sexually abuse them.
- CSE can occur through the use of technology without the child's immediate recognition that they are being exploited. For example they could be persuaded to post images on the internet / mobile phones.
- CSE is a criminal offence. Police and prosecutors can charge offenders with rape and other sexual offences as well as abduction, kidnapping and trafficking.
- This is a national issue. Children are being sexually exploited in all communities across the UK. CSE affects both girls and boys, and children of all ethnicities, cultures and social classes. Furthermore, children from loving and secure homes can be abused, as well as children with pre-existing vulnerabilities.
- CSE occurs in many forms and in many different settings. There is no single type of victim or offender. Focusing on just one model, such as group or gang CSE, risks missing other victims who are exploited in different circumstances.
- There is also a risk that victims don't recognise their abuse as CSE because it doesn't fit a particular model.
- The characteristics common to all victims are not their age, ethnicity, disability or sexual orientation, but rather their powerlessness and vulnerability. Violence, coercion and intimidation are commonly used by those exploiting children. And the child or young person's social, economic or emotional vulnerability limits their ability to resist exploitation.
- A common feature of CSE is that the child or young person does not recognise the coercive nature of the relationship and does not see themselves as a victim of exploitation. They sometimes confuse what is exploitation and what is genuine affection. This means that they are unlikely to report the abuse themselves.
- In order to prevent CSE, parents and carers and other community members need to have greater awareness of the issue and report concerns to the authorities. Everyone has a responsibility for this.
- CSE is a top priority for Greater Manchester Police and all the Local Safeguarding Children Boards in Greater Manchester. All key partners are working collectively to tackle CSE with a consistent and joined-up

approach – the Phoenix project. As part of this, there is a dedicated, specialist team in every district. In Oldham this is called Messenger.

- The loud and clear message to perpetrators of CSE is that we will find you and bring you to justice for the abuse you inflict on vulnerable young people.

Further information:

<http://www.itsnotokay.co.uk/>

http://www.barnardos.org.uk/get_involved/campaign/cse/spotthesigns.htm

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/underwear-rule/>

[Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners)

How to raise concerns

If you have any concerns about a child or young person please call Greater Manchester Police on 101 (999 in emergencies) and/or

Multi-Agency Safeguarding Hub (MASH)

child.mash@oldham.gov.uk

Level 9 Civic Centre

West Street Oldham

OL1 1UT

Tel 0161 770 7777

or ChildLine provide free and confidential advice for children and young people on 0800 1111.

http://www.oldham.gov.uk/info/200386/child_protection/620/report_child_abuse

Additional Advice and Information

Trafficking: safeguarding children - DfE and HO guidance

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

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children: • appear with unexplained gifts, money or new possessions; • associate with other children involved in exploitation;

- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- are regularly absent from school or education or do not take part in education. 126 Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/Child_sexual_exploitation_definition_and_guide_for_practitioners.pdf)

Appendix 5

Supporting mental health, where there is a safeguarding concern

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>