Inclusion is at the
heart of our trust

Child Protection and Safeguarding Policy and Procedures

Oak Learning Partnership

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V1	September 2022	R Carney	All previous versions archived
V2	September 2023	R Carney	Updated executive leaders titles Updated OLP vision to reflect developments Updated section 2 – concerns re Headteacher/CEO KCSIE references updated to 2023 throughout Updated page numbers for resources in KCSIE Changed Clinical Commissioning Group to Integrated Care Board Updated roles and responsibilities to include filtering and monitoring Updated DSL responsibilities relating to filtering and monitoring Changed references to Education Welfare Office to School Attendance Team Updated terminology and responsibilities to include Children Absent from Education. Included link to Bury CME Protocol 2023 Included impact on mental health, attainment and well-being in Attendance section Updated terminology in reference to Channel process Included change to legislation regarding Forced Marriage FMU contact details Updated references to legislation and statutory guidance

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			Updated procedures in relation to allegations about those leasing school property
			Updated allegations to include those leasing school property
			Updated that staff should feel comfortable to raise concerns regarding conduct online which has implications for safeguarding
			Included requirement for reasonable adjustments for children with SEND in relation to disadvantages
			Included signpost to SENDIASS
			Included information regarding Human Rights and PSED
			Included reference to PACE Guidance in DSL responsibilities
			Emphasised children may not understand they are being exploited in CSE

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1. Key school staff, roles and contact details

Role	Name	Contact
Headteacher, Unsworth Primary School	Jo Grundy	0161 766 4876
Chief Executive Officer	James Franklin-Smith	0161 553 0030
Strategic Safeguarding Lead	Rebecca Carney	0161 766 1597

Trustees and quality of education committee members

Role	Name	Contact
Chair of Trustees	Bernie Garner	garner.b@oaklp.co.uk
Safeguarding Trustee	Matt Webber	webber.m@oaklp.co.uk
Chair of Unsworth Primary School QEB	Katie Cass	cass.k@elmsbank.oaklp.co.uk
Safeguarding QEB member – Unsworth Primary School	Lee Murphy	murphy.l@hazelwood.oaklp.co.uk

Oak Learning Partnership is a Multi Academy Trust comprising of primary, secondary and special schools. Our vision is to transform lives through a highly inclusive educational approach. Inclusion is at the heart of our trust:

We are compassionately rigorous: we care deeply about our community which is why we push everyone to reach their full potential even if this feels difficult.

We have unconditional positive regard: we treat everyone with respect, dignity and warmth regardless of the circumstance or challenge.

We leave no one behind: we count in ones and focus on individual needs whilst ensuring everyone can thrive.

Everyone is welcome: we actively embrace diversity and are relentless in how we teach our stakeholders the importance of this.

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2. Quick guide to taking action

Our procedure if there is an urgent concern about **student** welfare or safeguarding is:

- Report concern to DSL/DDSL verbally
- Record concern(s) on CPOMS and actions taken
- The DSL will provide guidance on next steps
- In the unlikely event that there is not a DSL available on site/contactable by phone, please contact MASH to discuss your concern.
- **When discussing with MASH share:**
  - **What you worried about**
  - **What you think may happen if no action is taken**
  - **What are the strengths/protective factors?**
- **Agree needs to happen next**
- If you are concerned a student is in immediate danger call the Police on **999**
- For a student over 18, the procedure is the same, however the agency is Adult Safeguarding Team
- **MASH:** Multi-Agency Safeguarding Hub: 0161-253-5678 (8:45 – 4:45pm)
- **Adult Safeguarding Team:** 0161 253 5151
- **Emergency Duty Team:** 0161-253-6606 (Out of Office hours)

Our procedure if there is an allegation that an **adult** has harmed a child, or that a child is a risk from a named adult is:

- Inform the headteacher as soon as possible
- If the concern relates to the Headteacher/Executive Headteacher reports should be escalated to the CEO James Franklin-Smith or Chair of the school Trustees.
- In the event that staff feel unable to report concerns internally, or are not satisfied that appropriate safeguards have been put into place, this can be reported to the Local Authority Designated Officer:
- Local Authority Designated Officer (LADO): Mark Gay – 0161-253-6168/ 07583877250 LADO@bury.gov.uk or:
- Staff can contact NSPCC Whistleblowing Advice Service: 0808 800 5000, email help@nspcc.org.uk or fill in the online form.

For **mental health** concerns students and staff can access advice from Pennine Care NHS FT Mental Health Helpline 24/7 on:
0800 014 9995.

For urgent concerns about a young person's mental health staff can also signpost students and their carers to:

Accident & Emergency

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Fairfield General Hospital, Rochdale Old Road , Bury, Lancashire, BL9 7TD, alternatively, advice should be sought from dialling **111**, or the person's general practitioner (GP).

3. Terminology

3.1 A glossary of abbreviations is available in Appendix A

4. Introduction

4.1 Through the use of this policy and its procedures Oak Learning Partnership aim to create and maintain a safe learning environment and a culture where all children and adults feel safe, secure and valued. All students and members of staff should be reassured that when they raise a concern, they know they will be listened to and taken seriously.

4.2 This policy has been developed to ensure that all adults in our school, including the senior leadership team, regular staff, supply staff, volunteers and visitors, are working together to safeguard and promote the welfare of children and young people. We aim to identify and address any safeguarding concerns at the earliest opportunity and to ensure consistently good practice.

4.3 At Oak Learning Partnership we adopt a 'child-centred' approach and we have a culture where 'safeguarding is everyone's responsibility'.

4.4 *'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.'* (KCSIE 2023)

4.5 Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. Safeguarding is an integral part of all of our activities and functions.

4.6 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

4.7 Under the Education Act 2002, schools and colleges have a duty to safeguard and promote the welfare of their pupils and are committed to the guidance set out in 'Working Together to Safeguard Children (2018)' and 'Keeping Children Safe in Education (September 2023)'. Our policy ensures that we comply with our statutory duties and that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address

them. This policy ensures that we comply with local policies, procedures and arrangements.

4.8   Our policy complements and supports other associated school policies:

- Behaviour Policy
- Care & Control Policy (where applicable)
- Attendance Policy (including CME and 1st day absence reporting)
- Anti-bullying & Child on Child Policy
- Whistleblowing Policy
- Prevent Policy
- Blended Learning Policy
- Medication Policy
- Personal & Intimate Care Policy
- Acceptable Use & ICT policy
- Staff Code of Conduct

4.9   At Oak Learning Partnership we are responsive to new guidance and legislation and to promoting the safety of our staff and pupils in crisis situations, including Covid-19. Our policy is reviewed at least annually and all staff have annual safeguarding training.

5. Key trust staff, roles and contact details

ROLES & RESPONSIBILITIES

Leadership & Management
CEO, James Franklin-Smith and Headteacher, Jo Grundy

5.1   Our CEO and Headteacher are fully aware of our role in multi-agency safeguarding arrangements, of the Bury Integrated Safeguarding Partnership (BISP) arrangements and of the Child Death Review partnership arrangements. We will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, identifying and responding to their needs, including:

- *'providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 (CIN) or a section 47 (CP) assessment.' (KCSIE 2023)*

5.2   Our CEO and headteachers are fully aware of statutory guidance in KCSIE and will ensure that:

- The policies and procedures are adopted by the Trust Board to safeguard and promote the welfare of pupils and are fully implemented and followed by all staff, including supply teachers and volunteers.

- Policies are regularly updated in response to local practice or national changes in legislation.
- Ensure that all staff receive regular safeguarding and child protection training, including online safety and that this also reflects whole school approaches to filtering and monitoring.
- All staff including supply teachers and volunteers understand and comply with our Code of Conduct/Staff Behaviour policy.
- We evaluate our safeguarding policies and procedures at least on an annual basis undertaking audits and quality assurance.
- We work with the LA to ensure that our policies and procedures are in line with DfE and LA guidance.
- A senior member of staff, known as the DSL, is appointed with a clear job description. They have lead responsibility for Child Protection and Safeguarding and receive appropriate on-going training, supervision and support as well as sufficient time and resources to enable her to discharge her responsibilities.
- Parents/carers are aware of and have an understanding of our responsibilities to promote the safety and welfare of our pupils by maintaining our statutory obligations and that these are available on the school and college website.
- The Safeguarding and Child Protection policy is available on our website and is referenced in the staff handbook and provided at induction.
- Ensure that appropriate safeguarding arrangements are in place to respond to children who are absent from education.
- Child friendly information of how to raise a concern/make a disclosure is promoted in the PSHE and RSE curriculums and materials developed through co-production with our student body which is accessible to children.
- We co-operate fully with the three local partners, Bury Council, Police and Health (Integrated Care Board, ICB) to develop and follow multi-agency safeguarding procedures and arrangements and that these are in place to monitor the quality of referrals and interventions and the processes for escalation of concerns. Enquiries to the DSL can be made out-of-hours and in school holidays via **unsworth@bury.gov.uk** mailbox is monitored at regular intervals outside of term-time.
- We create a culture whereby all staff, volunteers and visitors feel confident and have knowledge of how to raise a concern about poor or unsafe practice with regards to the safeguarding and welfare of the children and young people and such concerns are addressed sensitively and effectively. Safeguarding posters, visitors leaflets and reception screens (where available) display information on how to raise a concern. Information is also available on the Safeguarding Noticeboard in the staff rooms and staff work rooms.
- Any staff who are carrying out regulated activities commissioned from external agencies/organisations have been DBS checked and their employing organisations have safeguarding policies in place, including safer recruitment and safeguarding training appropriate to their roles.
- We ensure a risk assessment takes place to establish that the appropriate checks take place on volunteers.
- We have appropriate procedures to ensure that there is no risk to children from visitors and we exercise diligence and prevent any organisation or speaker from using our facilities to disseminate extremist views or

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radicalise pupils and staff. We only allow recognised agencies such as NHS, Police, registered charities and organisations of similar integrity to provide training or intervention on the premises.

- The SLT will ensure that all staff promote the child's welfare and will have a culture of listening.
- Ensuring that low level concerns and allegations against staff are investigated and acted upon appropriately.

6. Designated safeguarding lead (DSL)

Name: Alastair Torr

6.1   The DSL of each school is a member of the Senior Leadership Team (SLT) and has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people. The DSL takes lead responsibility for Early Help, safeguarding and child protection, although some activities may be delegated as appropriate.

6.2   The DSL, together with team as applicable will:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
- To MASH where abuse and neglect are suspected, and support staff who make referrals to MASH.
- To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Understand the requirement for children to have an Appropriate Adult as per PACE Code C 2019 sec 1.7-1.7A
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.

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- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Understand the filtering and monitoring processes in place on school devices and school networks
- Ensure that staff receive regular training and updates in relation to safeguarding and child protection, inclusive of online safety and filtering and monitoring to ensure that staff feel confident to take appropriate action to safeguard children.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - o Ensuring that the school knows which pupils have or had a social worker.
  - o Understanding the academic progress and attainment of these pupils.
  - o Maintaining a culture of high aspirations for these pupils.
  - o Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  - o Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.

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- Undergo training and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.
- Ensure that all referrals made to Children's Services are effective and in line with Bury Council's procedures and the Greater Manchester Tri-X procedures and follow escalation process if necessary. If there is dissent in relation to the outcome of a referral or statutory intervention the DSL will follow the GM escalation procedure.

7. Strategic lead for safeguarding

Name: Rebecca Carney

- To promote a culture of safeguarding across the Trust.
- To lead on the development of policies and practices which support safeguarding and child protection.
- Quality assure safeguarding practice in line with statutory guidance.
- Be a point of contact for external agencies in relation to safeguarding enquiries at schools.
- Ensure children are tracked across a continuum of need and help is offered in a timely way.
- Support staff in identifying when children would benefit from early help and support referrals to statutory services and other appropriate agencies.
- Support DSLs with complex decision making.
- Develop staff's knowledge and awareness of safeguarding and procedures through CPD and regular updates.
- Guide schools in offering individual children and families support through intervention and outreach.
- Develop relationships with key agencies in the LA, Police and ICB.

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8. Our trust board and QEBs

8.1   Our Trustees and QEB members are fully aware of our role in multi-agency safeguarding arrangements, of the new Bury Integrated Safeguarding Partnership (BISP) arrangements and of the Child Death Review partnership arrangements and will ensure that we work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

8.2   Our Trust Board will ensure that:

- They take strategic leadership responsibility for the schools' safeguarding arrangements.
- Ensure that the school complies with its duties under child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the schools' safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that ALL staff read at least Part one and Annex B of KCSIE 2023.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure there is a named Trustee for Safeguarding who takes responsibility for Safeguarding across Trust schools
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs in each school/college to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensure staff responding to a concern take the child's wishes and feelings into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the Trustees is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of

allegations of abuse made against the headteacher or another QEB member or Trustee.

- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required. Ensuring the link Trustee/QEB member liaises with school to ensure that the Single Central Record is appropriately completed and updated as per the statutory duties outlined in KCSIE.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually. This training will include online safety and support staff to understand their roles in supporting filtering and monitoring.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Ensure that an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.

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- Ensure there are mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Ensure school has appropriate safeguarding responses for pupils who go missing from education or are absent from education, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

9. Special educational needs coordinators

Name: Sharon Marshall

- Ensuring all students have an Education, Health and Care Plan that meets their needs and is reviewed at least annually or as needs change
- To oversee a provision map of services which students access to support their health and well-being
- To coordinate the work of the multi-disciplinary teams who provide services to students
- To ensure referrals are made to external agencies to support the health and well-being of students
- Monitoring of Alternative Provision Provider's Safeguarding/Attendance protocols
- SLT Lead on Multi Discipline Team Meetings around complex students
- Designated lead for Looked After Children (LAC)/Children Looked After (CLA)

10. Strategic leads for attendance and behaviour

NAME: Alistair Torr

- To oversee attendance recording, monitoring and first day absence procedures
- To ensure that there are procedures in place for monitoring attendance and responding to children who are absent from education, and those who are Missing from Education.
- To work with the LA School Attendance Team to prevent school refusal and children missing education
- To lead on the development of attendance, behaviour, care and control policies
- To provide support to staff in the development of individual behaviour profiles and positive handling plans

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- To quality assure such plans and ensure that they are agreed by parents and carers
- To quality assure behaviour reporting, sanctions, PSHE and RSEs curriculums
- To lead on Team Teach training, monitoring and practices across the Trust to ensure that positive handling is executed safely and using the least restrictive approaches
- To oversee the strategic plan for staff and student well-being and lead on securing external accreditations related to well-being

11.   Strategic lead for professional development

Name: Jo Grundy

- To ensure all staff have a thorough induction process that allows them to undertake their duties safely
- To ensure that staff have access to and engage in quality CPD activities pertinent to their role
- To seek feedback from staff on their CPD needs and the quality of training received
- To ensure safe and effective staffing and cover levels across school and college and to liaise with the Headteacher where any risks are identified
- To work in conjunction with SLT, middle-leaders and HR in ensuring that staff are fit for work and that referrals to Occupational Health are undertaken as required for the benefit of staff, students and the organisation.

12.   All staff

12.1   All staff, including supply staff and volunteers, have responsibility for safeguarding, according to their roles and under the guidance of the DSL. All staff to read KCSIE (2023) Part 1 & Annex B, Code of Conduct and Safer Working Practice (2022) guidance.

12.2   All staff will:

- Maintain an attitude of '**it could happen here'** where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Follow our agreed Staff Code of Conduct Policy and 'Safer Working Practices' guidance as well as Acceptable Use Agreements.
- Consider, at all times, what is in the best interests of the pupil.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.

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- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Understand their roles and responsibilities in relation to supporting online safety and of the filtering and monitoring processes within school. Staff will escalate concerns about pupil's exposure to these risks to the DSL/DDSL.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to MASH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they have a safeguarding concern.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Be aware that teaching staff have a statutory duty to report any cases of known cases of Female Genital Mutilation (FGM) to the Police on 101/999.

13. Safeguarding children and young people with SEND

13.1 Children with special educational needs and disabilities (SEND) and certain health conditions can face additional safeguarding challenges both online and offline. Our child protection policy reflects the fact that children with Special Education Needs and Disabilities (SEND) face additional barriers in remaining safe. These can include:

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

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- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

13.2 We therefore:

- raise staff awareness about the extra vulnerabilities of children with SEND, particularly those adults who are working in 1:1 or small group situations
- offer support for those staff working with children with SEND
- ensure that every child has a way of communicating their voice and that it is listened to and responded to
- closely monitor children with SEND through high vigilance of staff and the open ethos of the schools
- offer pastoral support to children with SEND when monitoring has identified that they require this additional support
- ensure every child in school knows that they can communicate any worries they might have with any adult in school
- maintain positive, open and honest relationships and communication with parents/carers of children with SEND and ensure that opportunities for regular communication are used
- ensure that staff understand Safer Working Practice guidance (2022)
- ensure that reasonable adjustments are made to support students with SEND in dealing with disadvantages such as bullying, or abuse as per Equality Act 2010
- signpost families to Special Educational Needs and Disabilities Information and Support Service (SENDIASS)

13.3 When managing a safeguarding issue, the DSL will liaise with the SENCO as required, as well as the pupil's family/carers where appropriate, to ensure that the pupil's needs are effectively met.

13.4 Additionally, we recognise that all our pupils may have one or more ACES (Adverse Childhood Experiences) and that this also increases their level of vulnerability. We aim to be 'attachment aware' schools with staff trained to recognise signs of ACES and approaches to use with our pupils in this position.

14. Responding to concerns about a child

14.1 If a member of staff has a safeguarding concern or a pupil has reported a safeguarding concern in relation to themselves or a peer, the staff member will act on it immediately by speaking to the DSL or deputy DSLs.

14.2 Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

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14.3 All staff members have received training on the procedures for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

14.4 If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

14.5 DSLs are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child.

14.6 If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered.

14.7 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL/staff responding to the concern, and kept securely on CPOMS.

14.8 **If a pupil is in immediate danger, a referral will be made to MASH and/or the police immediately.**

14.9 **If a child has committed a crime, such as sexual violence, the police will be notified without delay.**

14.10 Where there are safeguarding concerns, the Trust will ensure that the pupil's wishes are always considered, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels they are being listened to and believed.

14.11 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

15. Recording and reporting concerns

15.1 All staff, volunteers and visitors have a responsibility to act on concerns about the welfare and safety of a student and all such concerns must be taken seriously. All concerns regarding students should be recorded securely on CPOMS. Records should be accurate, factual and contemporaneous. Staff should describe what they have seen or heard. If opinion is necessary, this should be clearly distinguishable from fact and a reason for the opinion should be given clearly, without prejudice or personal emotion. When deciding whether to refer an incident to MASH, the DSL or their deputies should state clearly the reason for their decision.

15.2 All teaching and support staff will have the ability to log a concern about any pupil regardless of their class or role. School administrators, visitors, volunteers and site team should share their

concern with a Designated Safeguarding Lead or Pastoral Lead who will take a signed and dated statement and upload to CPOMS.

16.   Safeguarding procedures

16.1   Low-level, less immediate / Ongoing concerns which are being monitored.

16.2   It is the responsibility of teachers to ensure that all welfare concerns are appropriately reported, addressed and recorded. In the first instance Pastoral Leads are responsible for monitoring that safeguarding procedures are being adhered to.

16.3   Class teachers should address ALL less-urgent concerns and record the concerns and their actions on CPOMS. Examples may include; lack of equipment, poor parental engagement, uniform issues etc.

16.4   **Action** is very important to ensure that the child is appropriately kept safe.

16.5   **Recording** is very important in that it informs all concerned parties about what has happened so far and also describes a context for the child in relation to concerns and where an individual concern fits into the bigger picture for that child.

16.6   The Designated Safeguarding Leads can provide support and advice for low level concerns.

17.   Cause for concern/ongoing concerns

17.1   For those with on-going issues, concerns need to be shared with the Safeguarding Officer/Pastoral Leads and well documented as this will be used as evidence to support early help/social care intervention. If you are unsure about any pupils, please speak to the Safeguarding Officer or Pastoral Leads. The Pastoral Lead or Safeguarding Officer is the first point of contact for external agencies. **If a social worker contacts a member of staff directly, please ensure this is passed to the DSL/DDSLs before contact is made.**

17.2   All concerns need to be recorded on the CPOMS online safeguarding system by the member of staff who is raising the concern (Refer to Staff Handbook for how to access CPOMS).

17.3   Form teachers will have enhanced access to the system and will be able to view their class pupils' previous concerns. It is vital that all concerns are recorded as this helps us to build a picture of the child's wellbeing. If in doubt over any concerns, speak to the Designated Safeguarding Lead or Deputy DSLs.

17.4   Where there is a concern that a student is experiencing or is likely to experience significant harm, a referral to MASH will be submitted (see page 5 for how to refer).

18.   Signs of abuse/injury

18.1   If a child has a visible injury a body map needs to be completed either on CPOMS or on a body map form (Appendix H). This must be immediately passed on to the DSL or DDSL (preferably a member of SLT).   The injury alongside a clear description and the body map should be recorded on CPOMS. The injury should be described as

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clearly as possible noting size, colour, location and any other relevant descriptions such as if the skin was broken.

18.2 A child must never be asked to undress to show an injury. An injury beneath clothes can be looked at if the child asks a member of staff to do so or the child shows the injury themselves. Where possible, seek an explanation from the child of how the injury occurred. Ask the child to **"tell, explain, describe"** – try to use open questions **"who, what, where, when."** Record any questions you have asked to make clear the child's statements and staff's questions.

19. Disclosures

19.1 If a child makes a disclosure of abuse, this needs to be reported immediately to the DSL or DDSL and **always before a child goes home**. The disclosure should also be recorded in writing using the child's own words and signed/dated by the member of staff who has witnessed the disclosure. Staff should not ask leading questions/put words into the child's mouth, however it is important where possible to seek clarity regarding the information.

19.2 Ask the child to **"tell, explain, describe"** – try to use open questions **"who, what, where, when."** Record any questions you have asked to make clear the child's statements and staff's questions.

19.3 Record any observations of the child, e.g. crying, pacing, shaking. **All staff, visitors and volunteers must be clear with children that they cannot promise to keep secrets**. Staff should reassure children that their concern will be taken seriously and let them know what will happen next.

19.4 The recording of the disclosure should be handed to the Pastoral Leads or a member of SLT for secure record keeping and where possible, it should be scanned onto the CPOMS system.

19.5 Other immediate concerns for a child's safety/well-being should be reported immediately to Pastoral Leads/SGO/DSL. They may require the class staff or pastoral support workers to take action, if so, they will direct this.

19.6 Any concerns regarding extremism and/or radicalisation must be dealt with in line with the school's Prevent Policy.

19.7 All children should be made to feel safe and comfortable when making a disclosure. Staff should understand that children may not feel ready or understand that they are making a disclosure. Students should be reassured that they are being taken seriously and will be supported.

19.8 Staff involved in supporting a disclosure should maintain appropriate levels of confidentiality taking advice from the DSL on who the information needs to be shared with e.g. MASH, form tutor etc.

20. Inter-agency working

20.1 Staff contribute to inter-agency working as part of our statutory duty following the local safeguarding arrangements outlined by BISP. The Trust will work with the three local partners the Bury Council, the Police and Health (ICB) other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support. Oak Learning Partnership

recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any requirements for early help.

20.2   Staff members are aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – **staff understand data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.**

20.3   Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

20.4   Where a referral has been made or an investigation triggered, the school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by MASH. Where MASH decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where MASH decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

20.5   At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

21.   Early help

21.1   Early help means providing support as soon as a problem emerges, at any point in a child's life for new or re-emerging concerns. Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help.

21.2   Any child may benefit from early help at times, but all staff will be particularly alert to the potential need for early help for a child who:

- Have Special Educational Needs or Disabilities - SEND (whether or not they have a statutory EHC plan)
- Are young carers
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups e.g. county lines
- Are frequently missing or going missing from care or from home
- Misuse drugs or alcohol

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- Are at risk of modern slavery, trafficking or exploitation
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse
- Are returned home to their family from care
- Show early signs of abuse and/or neglect
- Are at risk of being radicalised or exploited
- Are privately fostered
- Have certain health conditions and has specific additional needs
- Have a mental health need
- At risk of sexual or criminal exploitation
- Has a family member in prison, or is affected by parental offending
- Is at risk of 'honour' based abuse such as FGM or Forced Marriage
- Is persistently absent from education, including persistent absences for part of the school day

21.3 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation. All staff will be made aware of the local early help process and understand their role in it. The Pastoral Leads will take the lead where early help is appropriate under the guidance of the DSL. All staff will be made aware of the local early help process and understand their role in it.

Early Help Hubs: earlyhelp@bury.gov.uk

Bury East Locality Team (including Tottington/Ramsbottom) Tel: 0161 253 5200

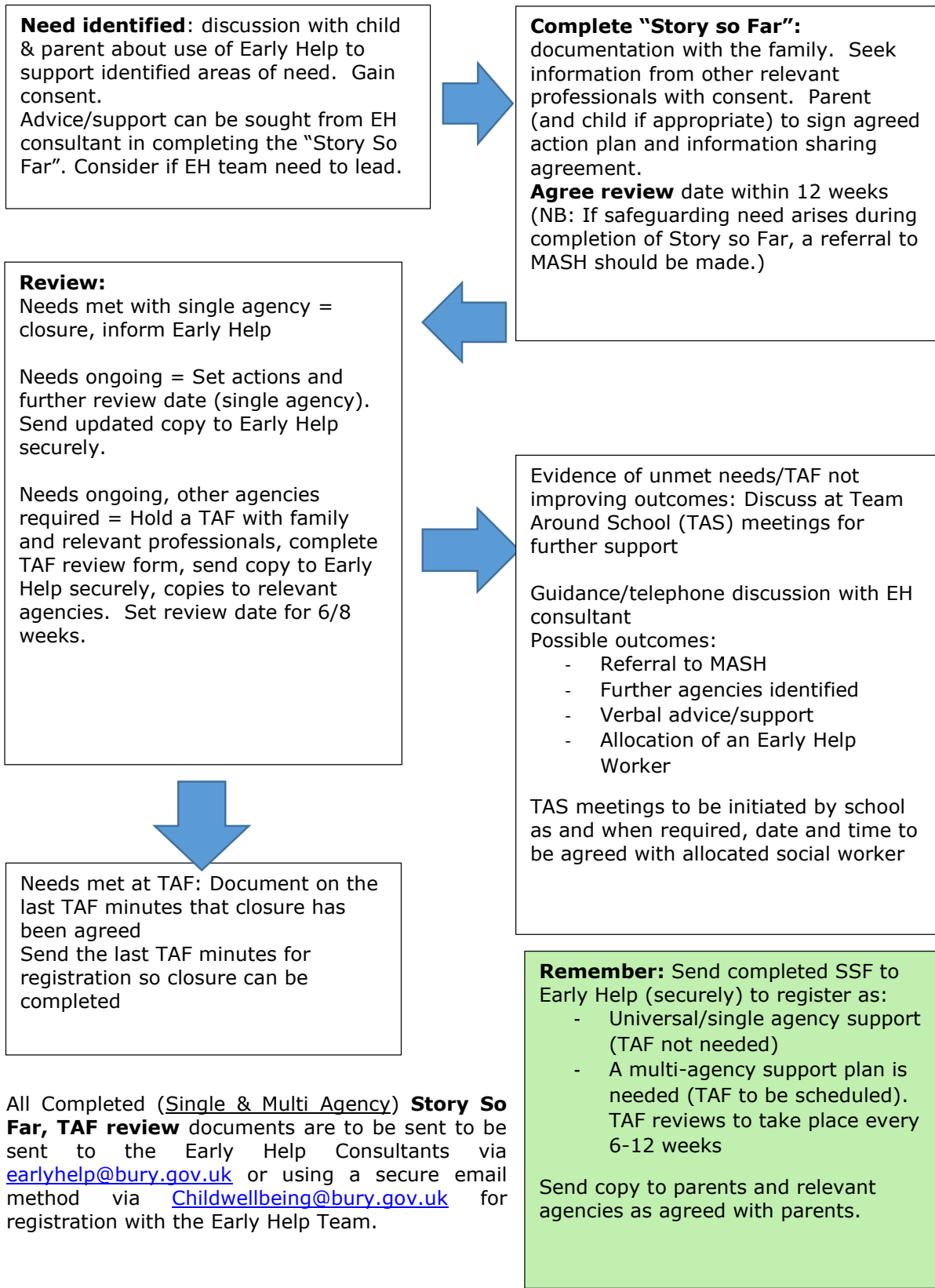**Whitefield Locality Team (including Prestwich)** Tel: 0161 253 5077

Radcliffe Locality Team Tel: 0161 253 7465/7468

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Early help pathway

Need identified: discussion with child & parent about use of Early Help to support identified areas of need. Gain consent.
Advice/support can be sought from EH consultant in completing the "Story So Far". Consider if EH team need to lead.

Complete "Story so Far": documentation with the family. Seek information from other relevant professionals with consent. Parent (and child if appropriate) to sign agreed action plan and information sharing agreement.
Agree review date within 12 weeks (NB: If safeguarding need arises during completion of Story so Far, a referral to MASH should be made.)

Review:
Needs met with single agency = closure, inform Early Help

Needs ongoing = Set actions and further review date (single agency). Send updated copy to Early Help securely.

Needs ongoing, other agencies required = Hold a TAF with family and relevant professionals, complete TAF review form, send copy to Early Help securely, copies to relevant agencies. Set review date for 6/8 weeks.

Evidence of unmet needs/TAF not improving outcomes: Discuss at Team Around School (TAS) meetings for further support

Guidance/telephone discussion with EH consultant
Possible outcomes:
- Referral to MASH
- Further agencies identified
- Verbal advice/support
- Allocation of an Early Help Worker

TAS meetings to be initiated by school as and when required, date and time to be agreed with allocated social worker

Needs met at TAF: Document on the last TAF minutes that closure has been agreed
Send the last TAF minutes for registration so closure can be completed

Remember: Send completed SSF to Early Help (securely) to register as:
- Universal/single agency support (TAF not needed)
- A multi-agency support plan is needed (TAF to be scheduled). TAF reviews to take place every 6-12 weeks

Send copy to parents and relevant agencies as agreed with parents.

All Completed (Single & Multi Agency) **Story So Far, TAF review** documents are to be sent to be sent to the Early Help Consultants via earlyhelp@bury.gov.uk or using a secure email method via Childwellbeing@bury.gov.uk for registration with the Early Help Team.

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22.   Training and awareness

22.1   In accordance with KCSIE (2023), all new staff and regular volunteers will receive appropriate safeguarding training and information during induction, including Online Safety training, with an emphasis on the impact of technology on increasing risks to children, knowing that children and young people can be both victims and perpetrators of abuse.

22.2   All new staff and volunteers will be made aware of the systems within the school and college which support safeguarding e.g. the Behaviour for Learning Policy, Acceptable Use Agreements, Care and Control Policy. This is inclusive of reading such policies and engaging in the robust induction programme which covers key policies, procedures and practices. As well as supporting the safety of students, the induction process also includes thorough training on understanding and supporting the varied and sometimes complex needs of students, such as communication, moving and handling and personal care as required.

22.3   All staff must ensure that they have read and understood Part 1 and Annex B of 'Keeping Children Safe in Education (2023)' so everybody in the setting understands their safeguarding responsibilities.

22.4   All staff will receive Safeguarding and Child Protection training at least annually which includes safeguarding information about our policies and procedures, signs and symptoms of abuse and neglect, indicators of vulnerability to exploitation and radicalisation, how to manage a disclosure from a child, preventing and responding to child-on-child abuse, and issues surrounding sexual violence and sexual harassment, as well as when and how to record a concern about the welfare of a child, with regular updates in relation to local and national changes.

22.5   Staff engage with case studies to demonstrate understanding of the nuances of safeguarding. Staff also undertake a follow-up questionnaire to evidence understanding of the material and support the DSL in understanding if there are gaps in knowledge/areas for development. Such sessions form part of PAD Day agendas and will feature on the CPD calendar throughout the year. Staff also have access to safeguarding bulletins via email and can access materials via the safeguarding boards in schools.

22.6   All staff need to understand the impact mental health problems may have on all aspects of safeguarding and this could be an indication of abuse, including the relevance of Adverse Childhood Experiences (ACEs) and the impact on the child/young person.

22.7   All staff and volunteers should read and sign to say that they have read and understood the following policies and guidance (as appropriate):

* The Child Protection and Safeguarding Policy
* The Staff Code of Conduct and Acceptable Use Agreements
* KCSIE (2023) Part One and Annex B
* Safer Working Practices (2022)

23.   Definitions of abuse and neglect

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

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For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will 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; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Adverse Childhood Experiences (ACES): ACES are a wide range of stressful or traumatic experiences that occur when a child is growing up. They include events that affect a child directly (such as abuse) or indirectly (such as living with domestic abuse or a parent with mental health problems.) ACES can be single events, long term or repeated experiences. ACES are very common – about half of all people will have experienced one ACE and about one in ten will have experienced four or more ACES. Research shows the more ACES that occur (in childhood) the higher the chances of adults having poor mental health and also physical health conditions such as liver disease and cancer. Having more ACES also increases the likelihood of engaging in health harming behaviours such as smoking, using drugs, criminal behaviour, early sexual activity.

Many people do not develop problems despite having ACEs. Things that improve the chances of staying well despite experiencing ACES include relationships with trusted adults and physical activity in childhood.

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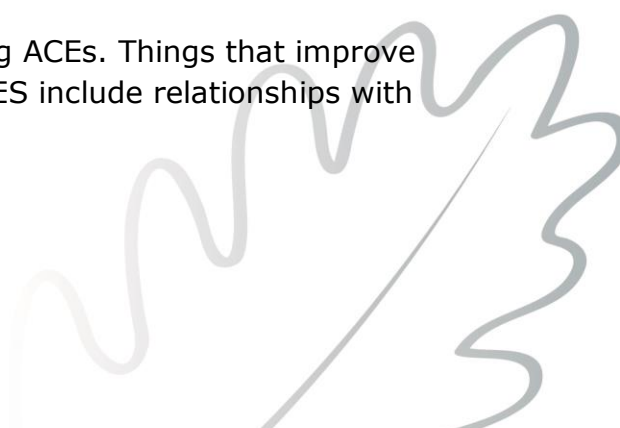
24.   Specific safeguarding issues

24.1   There are certain specific safeguarding issues that can put children at risk of harm; staff will be aware of these issues.

24.2   Appendix C of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

25. Operation encompass

25.1   Operation Encompass operates at Bury Council. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can provide support to be given to the child according to their needs.

25.2   Encompass reports are sent to **encompass@unsworth.oaklp.co.uk** which is monitored by DSLs. When a report is received this information is shared with key adults who support the child, on a need-to-know basis and is also recorded on CPOMS. Any actions required will be advised by the DSL. If the child has an existing social worker school will liaise with them around any inter-agency actions. Where the child does not have a social worker school will contact MASH to request information regarding their response.

26.   Contextual safeguarding issues

26.1   Contextual Safeguarding is an approach to understanding, and responding to, children/young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence, abuse and exploitation. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

26.2   Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe.

26.3   All staff are aware of contextual safeguarding issues and that these can put children or young people at risk of harm. When responding to concerns staff will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to MASH and or police.

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27.   Behaviour

27.1   Oak Learning Partnership understands that good behaviour in schools is central to a good education. Schools need to manage behaviour well so they can provide calm, safe and supportive environments which children and young people want to attend and where they can learn and thrive. Being taught how to behave well and appropriately within the context they're in is vital for all pupils to succeed personally.

27.2   The Trust are committed to ensuring that schools create environments where pupils and staff flourish in safety and dignity. Each school has an environment where positive behaviours are proactively reinforced. Pupils are taught explicitly what good behaviour looks like.

27.3   The Trust recognises that some pupils will need additional support to reach the expected standard of behaviour. Where possible, this support should be identified and put in place as soon as possible to avoid misbehaviour occurring in the first place. When pupils do misbehave, schools respond promptly, predictably and with confidence to maintain a calm, safe learning environment, and then consider how such behaviour can be prevented from recurring.

27.4   Staff are trained to understand the Behaviour Policy to make sure that they are collectively upholding the schools' behaviour policy, responding to misbehaviour consistently and fairly.

Behaviour and SEND

27.5   For students with SEND, their behaviour will need to be considered in the context of their additional needs, although it does not follow that every incident of misbehaviour will be connected to their SEND. Each school needs to manage pupil behaviour effectively, whether or not the pupil has underlying needs. When a pupil is identified as having SEND, a graduated approach will be used to assess, plan, deliver and then review the impact of the support being provided.

27.6   Further details regarding behaviour expectations, rewards, sanctions and support can be found in the school's Behaviour Policy.

28.   Child-on-child abuse (formerly peer on peer)

28.1   For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

28.2   The Trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in this policy's introduction, the welfare of the child is paramount.

28.3   All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

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28.4 All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

28.5 Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

28.6 All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

28.7 Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

28.8 The school's procedures for managing allegations of child-on-child abuse are outlined in the Anti-Bullying/Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures for Suspension and Exclusion, where relevant.

28.9 Safeguarding is taught as part of the curriculum. We appreciate that whilst adults in school are working hard to keep children safe, children also play a large part in keeping themselves and their peers safe from abuse and neglect. A developmentally appropriate curriculum is rolled out in school to build capacity amongst our students in their understanding of issues, and what actions they can take to be safe covering healthy relationships, Fundamental British Values, anti-bullying etc.

28.10 Students will be made aware of what constitutes unreasonable pressure from peers to engage in risk-taking or inappropriate behaviour, and of how to report their concerns.

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28.11 **Allegations of abuse by a peer/child will be treated as seriously as allegations of abuse from an adult, it should never be dismissed as "normal" behaviour or "banter".**

28.12 Any incidents of child-on-child abuse will be dealt with seriously and on a case-by-case basis. Consideration should be given to the significance of the young person's disability or learning difficulty (if applicable) when determining their intent to commit an incident of child-on-child abuse, their understanding of their actions and when assessing the risk posed by the incident of abuse.

Procedure

28.13 Staff's starting point in responding to any types of child-on-child abuse is that there should be zero-tolerance. Support and safeguards will be put into place for the victim and the perpetrator. Where a young person does not understand the consequences of their actions, staff will respond to assist them to understand their actions and to put further preventative measures in place.

28.14 Staff should report concerns to the DSL/Safeguarding Officer who will liaise with the strategic lead for behaviour. Reports made regarding child-on-child abuse will be risk assessed by the DSL on a case-by-case basis and, where required, investigated immediately and reported to the relevant agency, e.g. the police, MASH or CSC where required.

28.15 The procedures in this policy and the Behaviour Policy will be utilised to address concerns and to safeguard both victims and perpetrators. Staff recognise that children who abuse peers may themselves be a victim of abuse.

28.16 Oak Learning Partnership has a range of options to address child on child issues including through curriculum, targeted internal intervention, early help, referring to MASH and Police (where it is suspected a crime has been committed).

28.17 The DSL of each school will implement robust reporting procedures for child-on-child abuse and communicate these to all staff, pupils and parents as appropriate. Both the alleged perpetrator and victim will be provided with support whilst the report is being investigated. Pupils will be provided with the contact details of relevant bodies who can provide support to them during this time, e.g. Childline, Kooth.

28.18 The DSL will keep the victim, the alleged perpetrator and their families up to date where necessary with details of the investigation, including the conclusion and how appeals can be made.

28.19 Individuals will be given a copy of the school's Complaints Procedures Policy to assist them with the appeals process.

29.   Harmful sexual behaviour

29.1 Harmful Sexual Behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people, and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour.

29.2 Hackett defines Harmful Sexual Behaviour as: 'Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, maybe harmful towards self or others, or be abusive towards a child, young person or adult'.

29.3 In addition, sexual behaviour between young people, where one of the children is much older can be considered harmful (especially if there is more than two years difference, and if one is pre-pubescent and one is not). However, a younger child can still harm an older child. Harmful sexual behaviour is characterised by a range of behaviours that can include:

- Sexual name-calling
- Sexual harassment
- Online sexual bullying
- Sexual image sharing
- Sexual assault
- Rape

29.4 Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

29.5 Sexual behaviour can also be harmful if one of the children is much older (especially where there is a difference of two years or more, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

29.6 This is an especially difficult issue to deal with children, particularly in the younger age groups or with SEND, may engage in such behaviour with no knowledge that it is wrong or abusive. For this reason, it may be more accurate to talk about harmful sexual behaviour rather than abuse.

29.7 In such circumstances, instead of talking about 'the abuser', we endeavour to use the term 'young person who has exhibited harmful sexual behaviour'. As children themselves, they have the right to be protected and supported to lead better lives. We must not ignore the risk they may continue to pose, but we must also recognise that, with the right help, the vast majority will not re-offend.

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29.8 In conclusion, the process of dealing with referrals for HSB should not be seen as somehow separate or different to child sexual abuse referrals of any other type and in order that children are safeguarded (victim and/or perpetrator) the Trust is committed to the multi-agency requirements for Child Protection Strategy Discussions/Meetings.

29.9 All referrals to either Greater Manchester Police or MASH regarding HSB should be considered in conjunction with the Child Protection Procedures.

29.10 To support further understanding of and appropriate responses to HSB, some staff within the Trust have undertaken AIM checklist training. Staff may also refer to the Hackett continuum for context.

30. Sexual violence and sexual harassment

30.1 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.

What are sexual violence and sexual harassment?

Sexual violence

30.2 It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:
- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally see penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

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

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Sexual harassment

30.4 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- sending nudes (previously known as sexting) is when someone shares a sexual message, naked or semi-naked image, video or text message with another person. It doesn't have to be a nude image of them and could be an image of someone else. Young people can send nudes using phones, tablets and laptops and can share them across any app, site or game, including during a livestream. Many young people also share them on social media channels.

Response to Sexual Violence and Harassment

30.5 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.

30.6 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"

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- 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. The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.   As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

30.7   All staff should:

- Understand that whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report.
- All staff should be aware that children might not tell staff about their abuse ad that staff may overhear a conversation or to look out for changes in behaviour.
- All staff should report incidents of sexual harassment to their DSL.

### 31.	Consensual and non-consensual sharing of indecent images and videos

Sharing nudes or semi-nude images/video (previously known as sexting and the sharing of indecent images of pupils)

31.1   At Oak Learning Partnership we ensure that staff are aware to treat the sharing of indecent images of pupils through sharing nudes or semi-nude images/video as a safeguarding concern.

31.2   Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.

31.3   Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sharing nudes or semi-nude images/video.

31.4   Staff will be aware that creating, possessing, and distributing indecent imagery of pupils is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. Where a member of staff becomes aware of an incidence

of sharing nudes or semi-nude images/video that involves indecent images of a pupil, they will refer this to the DSL as soon as possible.

31.5 Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

31.6 The DSL will attempt to understand what the image contains without viewing it and the context surrounding its creation and distribution. Pupils' devices can be searched, screened and confiscated where it is believed to be linked to a safeguarding concern. **Staff should always have a second member of staff present. Staff should not seek to view nude or semi-nude youth produced imagery, they should discuss concerns around this with a DSL.** If a staff member reasonably believes a pupil's personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.

31.7 The DSL will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil. Where it is necessary to view the imagery, e.g. If this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with a member of the SLT (preferably someone trained to DSL level)
- If absolutely necessary to view, ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made using defensible decision making

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31.8 Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to MASH.

31.9 Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

31.10 In all cases where an adult is involved, this will be referred to the police.

31.11 DSLs will refer to <u>UK Council for Internet Safety Guidance</u> for further support.

32. Online safety and filtering and monitoring

32.1 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 Unsworth Primary School we have an effective approach to online safety and educate the whole school community in their use of technology and have mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

32.2 As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

32.3 The senior leadership team and DSL are responsible for ensuring the operational functions of filtering and monitoring within schools to ensure that appropriate safeguards are in place on school devices and school networks.

32.4 They will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- endeavour to block harmful and inappropriate content without unreasonably impacting teaching and learning

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- have effective monitoring strategies in place that meet their safeguarding needs.

32.5 Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- Their responsibilities in supporting filtering and monitoring procedures within school
- The procedure to follow when they have a concern regarding a pupil's online activity.

Social Media

32.6 Social media can provide positive connectivity for children however it can also make children vulnerable. We provide advice and guidance on safety on social media and digital resilience. This is explored through the Curriculum and any issues around the use of social media e.g. grooming, exploitation or cyberbullying etc should be reported to the DSL where a multi-agency safeguarding response will be considered.

Communicating with parents

32.7 As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

32.8 The school will also make it clear to parents what their children are being asked to do online for school.

32.9 Where pupils need to learn online from home, Oak Learning Partnership will support them to do so safely. We understand that a significant part technology has on safeguarding and wellbeing issues of children and young people.

Reviewing online safety

32.10 The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

32.11 The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school. Students and parents are made aware of the school's rules in relation to mobile phones/electronic devices.

32.12 Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. Only Trust devices may be used for photography purposes.

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32.13 Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

32.14 Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

32.15 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

32.16 Upskirting will not be tolerated by the Trust. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

33. Acceptable use agreements

33.1 This is in association with the Staff Code of Conduct Policy.

33.2 Mobile Phone Use and Camera Safety:

- Staff members, visitors and volunteers will not use personal mobile phones or cameras when pupils are present.
- Staff may use mobile phones on school premises outside of working hours when no pupils are present.
- Staff may use mobile phones in the staffroom during breaks and non-contact time. Mobile phones will be safely stored and in silent mode whilst pupils are present. Staff will use their professional judgement in emergency situations.
- Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.
- Personal mobile devices will not be used to take images or videos of pupils or staff under any circumstances.
- The sending of inappropriate messages or images from mobile devices is strictly prohibited.
- Staff who do not adhere to this policy will face disciplinary action.
- Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Data Protection Policy.
- The Senior Leaders will oversee the planning of any events where photographs and videos will be taken. Where photographs and videos will involve LAC/PLAC pupils, adopted pupils, or pupils for whom there are security concerns, the DSL/SENCO will determine the steps involved.

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- The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- Staff will report any concerns about another staff member's use of mobile phones to the Headteacher, following the procedures outlined in this Child Protection and Safeguarding Policy as well as the OLP Whistleblowing Policy.

34. Private fostering

34.1 Private fostering is when a child or young person under the age of 16 (or under age 18 if the child or young person is SEND) is cared for by someone who is not their parent or a 'close relative' for 28 days or more. This is a private arrangement made between a parent and a carer.

34.2 Where Oak Learning Partnership becomes aware of a pupil being privately fostered, they will notify MASH as soon as possible to allow the LA to conduct any necessary checks.

35. Children and the court system

35.1 Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict within families. This can be stressful for children. Oak Learning Partnership will work with agencies to make this information accessible to students as required, to meet their learning and communication needs.

36. Students at greater risk of harm

36.1 The Trust recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

36.2 Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

36.3 As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

36.4 Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

36.5 Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

36.6 In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

36.7 Where a parent has expressed their intention to remove a pupil from school for EHE, the school will inform the LA SEN team, and in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

36.8 Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

36.9 The Trustees will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

36.10 The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Pupils with SEND

36.11 When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

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36.12 When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

36.13 The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

36.14 Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

36.15 All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Supporting additionally vulnerable students

36.16 We ensure that all key staff work together to safeguard vulnerable children. Students are discussed at pastoral meetings, safeguarding briefings, attendance meetings and progress reviews, where key indicators of abuse and neglect may be raised, e.g. persistent absenteeism, behavioural difficulties, poor attainment etc. Where staff have a safeguarding concern, they will liaise with the DSL.

37.   Child's voice

37.1 Children are encouraged to contribute to the development of policies and share their views. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report.

37.2 We have 'a culture of listening' (KCSIE 2023). Where there is a safeguarding concern, we should ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide.

37.3 Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

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37.4 Students have opportunities to discuss their feelings, know how to raise a concern, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. This approach is encouraged throughout form-time, assemblies, curriculums and in targeted interventions.

37.5 Our schools are working on students and parents having a dedicated safeguarding section on our school website where they can access advice and support and we are also developing coproduced, accessible information for students on safeguarding and complaints procedures.

38. Attendance

38.1 A child missing from education (CME) or a child who is absent from school, particularly on repeat occasions/for prolonged periods, is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. We view poor attendance as a safeguarding issue and recognise the potential impact on pupils' mental health, as well as their attainment and wellbeing. In accordance with our Attendance Policy, absences are rigorously pursued and recorded. Any concerning patterns are reviewed.

38.2 In partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care.

38.3 Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases, this may form part of an Early Help Assessment e.g. Story So Far or a parent contract.

38.4 We implement the statutory and Local Authority requirements in terms of monitoring and reporting Children Missing from Education (CME).

38.5 For children with EHCPs in addition to working with the LA Attendance Team, we also work closely with the LA SEN team to address and overcome barriers to attendance and engage in multi-disciplinary discussions in deciding on outcomes.

Child Missing from Education (CME) School Attendance Team
3 Knowsley Place Duke Street Bury BL9 0EJ
Email: cme@bury.gov.uk
Fax: 0161 253 5730
Bury CME Protocol

39. Alternative provision

39.1 Oak Learning Partnership will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and ensure that there are appropriate safeguarding procedures in place.

39.2   Children who require access to AP will have a personalised learning plan designed to meet their needs. Their attendance will be monitored by us in accordance with the School Register Regulations. Our DSL will work together with the DSL at the AP to ensure that any safeguarding concerns are followed up appropriately.

40.   Work experience

40.1   When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. On occasions when Oak Learning Partnership offers work experience at school or college, an enhanced DBS check will be obtained if the pupil is over the age of 16 and the code of conduct will be followed along with a clear induction.

41.   Homestay exchange visits

School-arranged homestays in UK

41.1   Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

41.2   Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

41.3   The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

41.4　Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

Private fostering

41.5　Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

42.　Exclusions

42.1　Only the head teacher can exclude a pupil and this must be on disciplinary grounds. A pupil may be excluded for one or more fixed periods (up to a maximum of 45 school days in a single academic year), or permanently. A fixed-period exclusion does not have to be for a continuous period.

42.2　The Headteacher/DSL will be involved when an exclusion is implemented and any safeguarding issues will be considered. If there is an open Early Help, CiN or CP plan, the Practitioner or Social Worker will be informed.

42.3　Where it is felt that one of our schools can no longer meet a child's needs in respect of their safety or EHCP outcomes, school will call an emergency EHCP review to instigate a multi-agency discussion to ensure that there is improved understanding of the needs of the young person and their family and that the appropriate key agencies are involved. If it is agreed that the school can no longer meet the child's needs, the child will remain on roll until the LA find an appropriate school or college setting. During this time, contact will be arranged between the school and student and their family/carer. In exceptional circumstances this may be completed by the social worker or another LA representative to ensure the safety of the child.

43.　Case management, record-keeping and multi-disciplinary working

Record Keeping

43.1　Concerns about students are documented and held securely on CPOMS. Core data regarding the child is recorded on SIMs.   We keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. The record will also include a chronology of any other significant event in a child's life and up to date contact details for adults who have day to day care of the child.

43.2 We keep copies of all referrals to MASH, the Early Help Hubs and any other agencies related to safeguarding children. We keep our safeguarding records secure.

43.3 We send a pupil's child protection or safeguarding file separately from the main file to a new establishment if they leave as soon as we are informed of the new school and request a receipt of receiving such documents.

Pupils moving schools

43.4 Where pupils are moving to another setting, the school will continue to do whatever it reasonably can to provide the receiving institution with any relevant welfare and child protection information. The DSL will ensure that the receiving school has access to pupils' EHC plans, child in need plans, child protection plans or, for LAC/CLA, their personal education plan, and is informed who the child's social worker is (and, for LAC/CLA, who the responsible Virtual School is).

Working with parents and carers

43.5 Our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers and would expect them to provide up-to-date contact details, including at least 2 emergency contacts.

43.6 In most cases parents/carers will be informed when concerns are raised about the safety and welfare of their child and given the opportunity to address any concerns raised.

43.7 We aim to engage with parents/carers through the LA Early Help processes, including holding 'strength-based model' conversations.

43.8 We will inform, and gain consent from parents/carers if possible for multi-agency checks, if a referral is to be made to Children's Social Care or any other agency unless it is believed that by doing so would put the child at risk e.g. in cases of suspected sexual abuse or Fabricated or Induced Illness (FII). We will record the reasons if consent is not gained.

43.9 In such cases the DSL or Headteacher will seek advice from MASH/Children's Social Care.

Multi-agency team (MDT) working

43.10 We will develop effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues.

43.11 We will develop effective links with the Early Help Hubs and carry out an Early Help assessment as appropriate.

43.12 We will notify the named Social Worker if:
- A child subject to a child protection plan is at risk of permanent exclusion
- There is an unexplained absence of a child who is subject to a child protection plan
- It has been agreed as part of any child protection plan or core group plan.

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43.13 We will regularly review and report concerns if necessary, as detailed in KCSIE and will follow LA as well as the Greater Manchester Tri-X procedures if there is a need to re-refer or to escalate.

Confidentiality & Information Sharing

43.14 Staff will ensure that confidentiality protocols are followed and under no circumstances will they disclose any information about children outside of their professional role.

43.15 Information about children will only be shared with other members of staff on a need-to-know basis.

43.16 All staff and volunteers understand that they have a professional responsibility to share information with other agencies, in the best interests of the child's safety, welfare and educational outcomes. This is a matter of routine.

43.17 We have arrangements in place that set out clearly the process and principles for sharing information within school and with the three safeguarding partners, other organisations, agencies and practitioners as required. This includes an agreed rationale for gaining consent, when and what to share, when and what not to share and systems for recording these decisions.

43.18 We comply with the Data Protection Act 2018 and GDPR in that we ensure that we process all personal information lawfully and keep it safe and secure, with appropriate retention schedules. Further information can be found in the Records Management Policy. SCHOOL Data Protection Officer is: Andrea Jones Hatcher – School Business Manager. SCHOOL will cooperate with sharing track and trace information as required.

Child Protection (CP), Child in Need (CIN) & Team around the Family/Family Meetings and Conferences:

43.19 A child protection conference will be held by Children's Social Care (CSC) if it is considered that the child is suffering or at risk of significant harm.

43.20 We will attend and contribute to initial and review Child Protection (CP) conferences, Child in Need (CIN) meetings and relevant multi-agency meetings, including core groups. The DSL and DDSL will attend multi-disciplinary team meetings.   Oak Learning Partnership aims to attend all MDT meetings and will work with agencies to ensure that these are completed within term-time. Where a meeting is required during a school holiday and there are exceptional circumstances such as a Strategy Meeting or Child Protection Conference, the DSL will endeavour to ensure that an appropriately trained member of staff attends. Invitations outside of term time should be sent to: unsworth@bury.gov.uk.

43.21 Members of staff who are asked to attend a child protection conference (either in person or virtually) about an individual pupil/family will need to have as much relevant updated information about the child as possible and will send a report, using the most up-to-date pro forma to

the Chair within the required timescales, at least 24 hours prior to the meeting.

43.22 Our reports will always include the voice of the child, which is especially important where there may be barriers to communication.

43.23 We will discuss and share reports with the parents/carers before the conference. We understand that it can sometimes be difficult for parents to hear/read concerns, however, it is important that we are transparent in order to collectively address concerns in the best interests of the child. We expect that the LA explain to parents and carers the importance of this collaborative approach.

43.24 All relevant staff will be confident in using the tools which are part of the Signs of Safety approach.

44. Concerns raised by children, staff and volunteers

44.1 Any concern, disclosure or expression of disquiet made by a child or adult will be listened to seriously and acted upon as quickly as possible to safeguard the welfare of students.

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

44.3 We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

45. Learning from rapid reviews

45.1 The Bury Integrated Safeguarding Partnership (BISP) will always undertake a rapid review (RR) when a child dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death or if a child has been significantly harmed.

45.2 If required, we will provide an individual management report for a RR and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

45.3 Our DSL will keep up to date with the findings from Rapid Reviews and other learning reviews nationally and in Bury, share the learning and review our safeguarding procedures if relevant.

46. The curriculum

46.1 We are committed to promoting emotional health and wellbeing and to supporting the development of the skills needed to help keep children safe and healthy. This includes face to face teaching, blended learning and online learning as needed in response to any crisis situation that may arise.

46.2 Senior Leaders and Trustees are aware of the opportunities to teach safeguarding and recognise that a one size fits all approach may not be appropriate for all children and a more personalised and contextualised approach for more vulnerable children, victims of abuse and our students with SEND might be needed. (KCSIE 2023).

46.3 All children have access to an appropriate curriculum, differentiated to meet their needs. They are encouraged to express and discuss their

ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect and empathy for others.

46.4   Personal Social and Health Education (PSHE), Relationship and Sex Education (RSE), Citizenship and Religious Knowledge lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, family patterns, religious beliefs and practices and human rights issues.

46.5   We take account of the latest advice and guidance provided to help address specific vulnerabilities and forms of grooming and exploitation e.g. Domestic Abuse, Child Sexual Exploitation, Child on Child abuse, Radicalisation, 'Honour-based' Abuse, including Forced Marriage, Female Genital Mutilation, Breast Ironing, Modern Slavery and County Lines.

46.6   Students are encouraged to seek out an adult at school/college if they are feeling worried and are reassured that their concerns will be taken seriously and treated with respect.

46.7   Children are encouraged to share their views, concerns and ideas through various forums, including school council meetings and within weekly PSHE and RSE lessons.

47.   Managing allegations against staff and volunteers

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

47.2   The Headteacher supported by SLT has a duty of care to investigate all allegations of abuse. All staff are encouraged to recognise that **"it could happen here**" and therefore need to remain vigilant at all times. Staff should always act in children's best interests.

47.3   Oak Learning Partnership follows KCSIE (2023) guidance on handling allegations as follows:

- Allegations that may meet the harms threshold
- Allegations and/or concerns that do not meet the harms threshold, referred to in KCSIE as 'low-level concerns'

48.   Low level concerns

48.1   The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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48.2　KCSIE gives examples such as: being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or, humiliating pupils.

48.3　The staff code of conduct sets out the standards that staff are expected to maintain. It is crucial that any concerns are shared responsibly and with the right person, and recorded and dealt with appropriately.

48.4　We ensure that all staff are aware of how to raise a concern, including anonymously as a whistleblower. Staff should follow the guidance set out in the OLP Whistleblowing Policy and all staff will receive information on Whistleblowing as part of their induction, and/or as part of a suite of CPD.

48.5　Oak Learning Partnership encourage staff to raise concerns in relation matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

48.6　OLP will ensure that all safeguarding concerns, including those which do not meet the harm threshold, are shared responsibly with the headteacher and DSL, are recorded in writing, meeting the requirements of KCSIE (2023), and dealt with appropriately. As well as protecting children and young people from harm, our systems aim to protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

48.7　Staff are encouraged to reflect on their behaviour and interactions and self-refer where 'they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.'

48.8　Reports of low-level concerns about supply staff and contractors will be notified to their employers.

48.9　Low level safeguarding concerns will not be included in references for a member of staff unless a low-level concern (or group of concerns) has met the threshold for referral to the LADO or the investigation has substantiated the concern and resulted in disciplinary action, in which case, it will be referred to in a reference.

48.10　Low level safeguarding reports will be reviewed to identify potential patterns of behaviour. If any are identified, the Headteacher will take appropriate action by bringing to the attention of SLT who review policies, procedures and consider training needs.

48.11　Historic allegations will be referred to the police on 101/999.

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49. Allegations that may meet the threshold

49.1 The harms test is outlined as follows:

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

49.2 Allegations that may meet the harms threshold will be referred to the LADO. The headteacher will seek advice from the LADO in how to proceed and will act as case manager in investigating any concerns. Where concerns are in relation to supply staff or contactors, the headteacher will continue to act as the case manager as they are likely to have access to staff, students and knowledge of the environment and systems.

49.3 Where the allegation relates to an individual or organisation letting school property, the matter will be referred to the LADO for advice and investigation as required.

50. Reporting concerns about staff, visitors and volunteers

50.1 Staff should report any concerns about the conduct of staff and visitors to the headteacher. If the concern related to a headteacher, or the CEO James Franklin-Smith should be notified or the Chair of the QEB of the school in question, or the Chair of Trustees, Bernie Garner.

50.2 ANY member of staff can make a referral to LADO (see form in Appendix F) or utilise the NSPCC whistleblowing hotline if they feel unable to raise concerns internally or believe that children are at risk of harm. There is a whistleblowing flowchart in Appendix E.

51. Safety onsite and offsite

- Our site is secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.
- We have good up to date knowledge of our local area and any safeguarding risks within the wider community.
- All visitors, including visiting speakers, are subject to our safeguarding protocols while on site and will be supervised at all times, if no checks have been obtained. They will wear a red lanyard. Staff and visitors are required to sign in and out of the building for safety purposes.
- We will ensure that any contractor, or any employee of a contractor, who is to work in our school, has been subject to the appropriate level of DBS check or is accompanied on site at all times. We are responsible for determining the appropriate level of supervision depending on the circumstances. We will always check the identities of contractors and their staff on arrival.

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- We operate a responsible booking protocol and will carry out appropriate checks on all organisations which request to hire our facilities.
- We exercise due diligence to prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise pupils or staff.
- We have a work experience placement policy and procedures in place. We will ensure that any person supervising a child on a placement has been subject to the appropriate level of DBS check.
- All school/college visits are fully risk-assessed and no child will be taken off-site without parental permission.

52.   Remote education

52.1   For details of remote education, please see Blended Learning Policy. If school are required to provide remote education for students, the following safety protocols will be followed:

- Teachers will plan online lessons with the safety of pupils in mind.
- Staff communicating with pupils or parents via video call will do so from within the school, or from a quiet room with a neutral background if working from home.
- Teachers will ensure all online planning processes for pupils who are working online will have clear reporting routes to the school and external agencies, so they can raise concerns whilst online.
- The DSL will ensure every pupil has their contact information, so they know how they can contact them about any safeguarding concern.
- Pupils will be provided with online safety information by their teacher.
- Pupils will be directed to practical online support, such as Childline, where they feel unsafe and require support outside of school. Parents will be given a list of websites their child may access and any information regarding online sessions with staff that their child will be participating in.

52.2   Parents will be provided with the contact details of the DSL, so they can report any concerns. When communicating online, staff will:

- Communicate within school hours as much as possible.
- Communicate through the school channels approved by the SLT.
- Only school email accounts
- Use school devices over personal devices wherever possible.
- Not share personal information.

53.   Safer recruitment

53.1   Oak Learning Partnership is committed to following Safer Recruitment procedures. Please see Appendix I for further information. Full details can be found in OLP Safer Recruitment Policy.

54.   Use of school premises for non-school activities

54.1   Where the Trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run

community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

54.2   Where the Trust provide the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Trustees will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Trustees will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Trust will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

54.3   Providers using school facilities are expected to comply with Keeping Children Safe in Out of School Settings.

54.4   In the event that schools receive any allegations relating to incidents that happened when an individual or organisation was using school premises, school will follow the OLP Safeguarding procedures including informing the LADO who may be best placed to investigate.

Extracurricular activities and clubs

54.5   External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

54.6   Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASH or the police, if necessary. Staff responsible for extended services are trained to DSL level.

55.   Human rights and public sector quality duty

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

55.2   The specific Convention rights applying to schools and colleges are:
   • Article 3: the right to freedom from inhuman and degrading treatment (an absolute
   • right)
   • Article 8: the right to respect for private and family life (a qualified right) includes a
   • duty to protect individuals' physical and psychological integrity
   • Article 14: requires that all of the rights and freedoms set out in the Act must be
   • protected and applied without discrimination25, and
   • Protocol 1, Article 2: protects the right to education.

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55.3   Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Through its policies, procedures, safeguarding culture and school values, the Trust ensure that learners' human rights are protected.

55.4   The Public Sector Equality Duty (PSED) places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny and racism.

55.5   Through its policies, procedures, safeguarding culture and school values, the Trust ensure that staff and learners' human rights are protected and that the PSED is put into practice.

Appendix A

Acronym/initialism list and description

ACES	Adverse childhood Experiences	Traumatic events which can have an impact on both children and/or adult's lives.
CCE	Child Criminal Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
LAC (also CLA)	Looked After Child	Children looked after: A child who has been placed in local authority care or where children's services have looked after a child for more than a period of 24 hours.
CME	Child Missing from Education	Children Missing Education (CME) are children who are of compulsory school age who are not on a school roll and who are not receiving a suitable education by other means (e.g. privately, electively home educated (EHE) or in alternative provision).
CSC	Children's Social Care	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's' services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the Data Protection Act.
DSL	Designated Safeguarding Lead	A member/s of the senior leadership team who has lead responsibility for safeguarding and child protection
EHC Plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have significant needs that impact on their learning and access to education. The plan

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		identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.
GDPR	General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA/HBV	Honour Based Abuse/ Violence	'Honour-based' abuse So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales.
HMCTS	HM Courts and Tribunals Service	HMCTS is an executive agency, sponsored by the Ministry of Justice.
HSB	Harmful Sexual Behaviour (also known as Sexually Harmful Behaviour)	Harmful Sexual behaviour is sexual behaviour expressed by children or young people under the age of 18 years old that is developmentally inappropriate, this may be harmful towards oneself or others or be abusive towards another child, young person or adult.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the 6 Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
ITT	Initial teacher training	A programme of training to achieve qualified teacher status.
KCSIE	Keeping Children Safe in Education	Keeping children safe in education Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.

LADO	Local Authority Designated Officer	All allegations about people who work with children, in statutory, independent or voluntary organisations, must be referred to the Local Authority Designated Officer (LADO). A referral to the LADO **must** be made if there is information about a person indicating they have: ▪ Behaved in a way that has harmed a child or may have harmed a child; ▪ Possibly committed an offence against or related to a child; ▪ Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; ▪ Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
LGBTQ+	Lesbian, gay, bisexual, transgender, queer, plus	Term relating to a community of people, protected by the Equalities Act 2010, who identify as a lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
OLP	Oak Learning Partnership	The Multi-Academy Trust
PSHE	Personal Social and Health Education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
QEB	Quality Education Board	Formerly known as school governors. QEBs are accountable to Trustees.
RSE	Relationships and sex education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality as well as promoting positive relationships.
SCR	Single Central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend educational provision in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of HWHS's special educational needs policy and

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		provision of education to pupils with special educational needs.
SEND	Special educational needs and/or disabilities	A pupil is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most pupils their age.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school/college setting.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual School Heads	Virtual school head Virtual school heads are in charge of promoting the educational achievement of all the children looked after (CLA) previously LAC by the local authority.

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Appendix B

Safeguarding issues

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:
- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:
- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to MASH/CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to MASH/CSC will be made as necessary where concerns are raised.

However, it should also be recognised in some cases children/young people could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Referrals can be made via: 0161 253 5537 between 9am and 5pm. For emergencies after 5pm or at weekends please call 0161 253 6606.

Information is available at: https://www.bury.gov.uk/homeless

Children missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.

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- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Students with an EHCP who may otherwise access LA School and College transport, but whom wish to travel to and from school independently have the opportunity to undergo "Independent Travel Training" (with parental consent) where their capacity to keep themselves safe in the community is assessed. Only where trainers are confident that a child has the knowledge and skills to keep travel safely to and from school/college, will they be recommended to do so. Enquiries are sent to schoolandcollegetransport@bury.gov.uk

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.

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- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:
- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:
- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

Referring cases: Where CCE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to MASH noting concerns around CCE. Bury Complex Safeguarding Team should offer a consultation where there are factors relating to CCE.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:
- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.

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- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme. Cyber Choices can be contacted for advice at cyberchoices@nca.gov.uk

Information is available at Cyber Choice (National Crime Agency)

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Referring cases: Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to MASH noting concerns around CSE. Bury Complex Safeguarding Team should offer a consultation where there are factors relating to CSE.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

Honour based abuse

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Honour based abuse (HBA) is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour.

HBA occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Examples of HBA:

- physical abuse (kicking and beating);
- psychological pressure (strict monitoring, humiliation, threats);
- forced marriage;
- abandonment (leaving someone in their country of origin or sending them back there);
- forced suicide;
- honour killing (murder)
- Female Genital Mutilation (FGM) FGM is encompassed within the term Honour Based Abuse

ALL staff and volunteers are aware of the "one chance rule" (a practitioner may only have one chance to speak to a potential victim and have one chance to save a life) and will report all cases of suspected Honour Based Violence to the DSL immediately.

Indicators that HBA may have already taken place include the following:

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

Breast ironing

Breast Flattening or Breast Ironing is:

"the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely."

Breast ironing is often carried out by the girl's mother with the belief that she is:

- Protecting her daughter from sexual harassment and / or rape
- Preventing the risk of early pregnancy by "removing" signs of puberty
- Preventing her daughter from being forced into marriage, so she will have the opportunity to continue with her education

Breast ironing is often a well-kept secret between the girl and her mother. This can make it difficult for professionals to identify. Care must be taken to navigate the deep-seated cultural belief and familial sensitivity of this practice. Many girls will not disclose that they are a victim of breast ironing for fear that their mother will get into trouble; or they believe it is being done for their own good.

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Some signs that a girl is at risk from breast ironing include:

- Unusual behaviour after an absence from school or college including depression, anxiety, aggression, becoming withdrawn
- Reluctance in undergoing medical examinations
- Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear
- Fear of changing for physical activities due to scars showing or bandages being visible

The practice of breast ironing is not explicitly covered under legislation. However, it is understood by the Government to be physical abuse.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

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

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Indicators that FGM may take place soon include:

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

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

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

FGM is included in the definition of **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

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Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate. Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour

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- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. For a child under 18 any marriage is considered a forced marriage, even if there is no physical or emotional pressure involved.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

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Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.
The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing; this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

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The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment; in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.
Forced Marriage Unit Tel: 020 7008 0151 Email: fmu@fcdo.gov.uk

Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

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

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

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The Prevent duty

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy, however school staff will follow the principles of:

- **Notice** – if someone's behaviour or the things they say cause us a concern
- **Check** – discuss with colleagues who know the young person and with a DSL.
- **Share** – Share with a DSL who will be best placed to advise on whether a referral to Channel and/or MASH, or Early Help is needed

Staff can contact local police by dialling 101 and ask for the PREVENT team, or if you require urgent police assistance dial 999.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. Although consent is not required to refer to Channel, an individual's consent will be required to provide their consent before any support delivered through the programme is provided.

The Counter Terrorism North West Officer for Bury is:

Name	Email	Phone
Darren Howarth	darren.howarth@gmp.police.uk	07827979113

Channel helpline	020 7340 7264
Referrals to Channel You do not need the consent of the subject to make a referral - consent will be sought by the Channel Team before being adopted by Channel. Prevent Referral Form If you have any questions whilst filling in the form call: GMP Prevent Team 0161 856 6362	
childwellbeing@bury.gov.uk (for children) OR adultcareservices@bury.gov.uk (for adults)	
AND channel.project@gmp.police.uk **AND** gmchannel@manchester.gov.uk	

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Primary School Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary and college Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

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Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.
The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.
In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.
All staff are 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. All 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, by speaking to the designated safeguarding lead or a deputy DSL.

Oak Learning Partnership will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

We understand that we have an important role to play in supporting the mental health and emotional wellbeing of our pupils. Oak Learning Partnership supports students to understand and communicate their feelings using their individual communication systems. Students can access a wealth of support from their form tutor, school nurse, pastoral team, SENCO as well as accessing external agencies such as Healthy Young Minds/CAMHS, Early Break, Kooth, and Childline.

Students and staff can also access Pennine Care NHS FT mental health helpline 24/7 on: 0800 014 9995

For urgent concerns around a young person's mental health staff can seek consultation from Pennine Care NHS 24-hour mental health helpline 0800 014 9995

Serious violence

All staff should be aware of the procedures with regards to serious violence.
In the 2018 Serious Violence Strategy, the government defines serious violence as

"specific types of crime such as homicide, knife crime, and gun crime and areas of criminality where serious violence or its threat is inherent, such as in gangs and county lines drug dealing".

All staff to be aware of risk factors to look out for which may increase the likelihood of involvement in serious violence. Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

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Appendix D

Early help links/documents

Story so far

Story so far with prompts

Story so far -- guidance

Team around the family review

Seven minute Early Help briefing

How I see my world

How I see my world -- aide memoir

Review guidance

Appendix E

Oak Learning Partnership Whistleblowing Flowchart

Concern should be raised about member of staff/volunteer to **Headteacher** (Name). If the concern is about the Headteacher, the concern should be raised with **CEO** James Franklin-Smith, or **Chair of Governors** (name). Contact details available at reception. The identified person will act as **Case Manager** (though some tasks may be delegated).

Case Manager to consider: Is the harms threshold met? Has the staff or volunteer:
behaved in a way that has harmed a child, or may have harmed a child and/or;
• possibly committed a criminal offence against or related to a child and/or;
• behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
• behaved or may have behaved in a way that indicates they may not be suitable to work with children
Case Manager may consult with LADO

Yes, harms test met
LADO and Case Manager will agree a plan of action to gather information, report to police/social care if required, and implement a risk assessment for those who may be harmed.
HR to be informed by Case Manager
Agreement on how the subject of the allegation will be supported.

No, harms test not met
If consulted, LADO will provide advice to case Manager and log as "LADO contact."
"Low level" concerns procedure followed which includes full investigation, safeguards as required, disciplinary action as required; any changes to practice required will be implemented.
LADO will be updated about findings and actions taken. LADO will close contact.
Note:
A "low level" concern is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. If a concern does not meet threshold for LADO, it will still be taken seriously and acted upon. "Low level" does not mean that is acceptable or insignificant.

LADO will arrange Allegations Management Meeting (AMM) if required for information sharing, and further action plan will be agreed. Further evidence, referrals to police or social care may be required.

Outcomes
Substantiated / Unsubstantiated / Unfounded / Malicious / False

Actions:
• No further action
• Professional advice, guidance, training
• Disciplinary process
• Criminal prosecution
• Dismissal – inappropriate information sharing

&

As required, referral to:
• Disclosure and Barring Service
• Teaching Regulation Agency
• Ofsted
• Social Work England
• or other identified professional or registered body

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This flow chart is intended for use where there are concerns about:

- any unlawful act, whether criminal or a breach of civil law
- maladministration
- breach of any statutory code of practice or staff code of practice
- breach of, or failure to implement or comply with Financial Regulations
- any failure to comply with appropriate professional standards
- fraud, corruption or dishonesty
- actions which are likely to cause physical/mental/psychological danger to any person, or to give rise to a risk of significant damage to property
- loss of income to the school
- abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose
- discrimination in the provision of education
- any other matter that staff consider they cannot raise by any other procedure

*(List is not exhaustive)

Appendix F

Bury LADO Initial Consideration/Enquiry Form

Once completed send to LADO@bury.gov.uk

Office Use Only Is this at LADO/Managing Allegations Full Threshold: If Yes - Reference no. (From Database):	

Date LADO notified	
Name of person completing the form	
Full Name of person of potential concern	
Date of birth	
Address of Person	
Details of Establishment where person of potential concern works	
If agency worker, details of agency, telephone number and contact name	
Job role	
Contact number of referrer	
Email Address of referrer	
Name/Position of person referring information	

Category	Choose an item.	**Area of complaint**	Choose an item.

Please keep information clear and concise

DETAIL OF: ALLEGATION/INCIDENT/ENQUIRY (date and time of allegation)

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CHILD'S Details, to include full name, date of birth and address/INITIAL ACCOUNT OBTAINED (Preferably with parent or carer present unless they are the person of potential concern)
(Note: no leading questions should be asked, questions should be kept open and to a minimum, i.e., what was the incident, and how did they feel, did anyone witness this?

PARENTS/CARERS details of child if known and contact numbers - CARERS VIEW (what was their response and what action would parents/carer like to see taken)

ANY WITNESSES? – Full details of contact details
(Note: if so do not discuss what the child has said, ask only if they are aware on any incident that has occurred involving the child and ask that they make a note of their account, print name, sign and date)

IS THERE ANY CCTV FOOTAGE TO PROVE OR DISPROVE THE ALLEGATION? If there is, what does it show?
(Please check this first and ensure a copy is kept)

HAVE THERE BEEN ANY HISTORIC ALLEGATIONS MADE BY THE CHILD?
(dates and outcomes)

HAVE THERE BEEN ANY HISTORIC ALLEGATIONS OR CONCERNS IN RELATIONS TO THE MEMBER OF STAFF?
(dates, what the allegation was and outcome)

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POLICE ADVICE OR RESPONSE

HR/Employer ADVICE OR RESPONSE

CHILDREN'S SOCIAL CARE ADVICE OR RESPONSE

LADO ADVICE OR RESPONSE – Final Outcome

<u>**Office use only:**</u>

Date of Closure: _____

Signed by: _____

Position: _____

• **Emails received to show confirmation of above if needed.**
•

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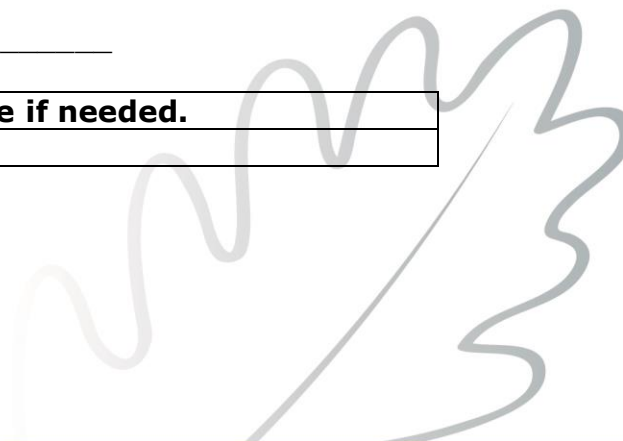
Appendix G

Useful links and websites

Websites for additional advice and support on Specific Safeguarding Issues can be found in 2023 pages 156 onwards

Other useful numbers:

Initial Response Team (IRT): 0161-253-5454 (for those already open to a Social Worker)

Safeguarding Team (SGT): 0161-253-6868 (for those already open to a Social Worker)

Complex Safeguarding Team: 0161 253 5678

Care and Support Service (CASS): 0161-253-6666 (for CLA open to a Social Worker)

First Point Family Support Services: 0161-641-4585

Virgin Care Sexual Health Service: 0300 303 8565

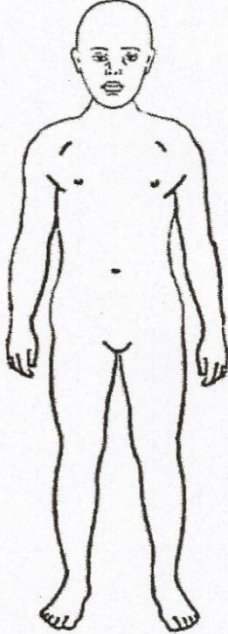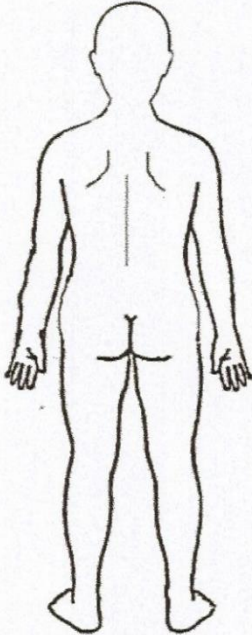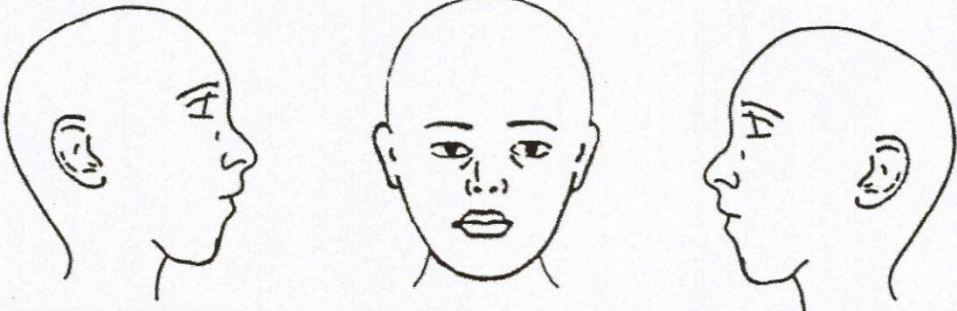**NSPCC Whistleblowing Line:** 0808 800 5000

Appendix H

Body map

Name:………………………………………………………………………

Date and time:……………………………………………………………..

Name of person completing form…………………………………………………………………………………….

Front

Back

Face

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Description of Injuries and Circumstances in which they have been found / disclosed:……… ……… ……… ……… ……… ……

If the young person volunteers an account of this injury (please do not prompt) give details: ……… ……… ……… ……… …………………………………………………………………………

If the parent / guardian has given an account of this injury, give details:……… ……… ……… ……… ……… ………………………………………………

Action taken:……………………………………………………………………………………………… ……… ……… ……… ……

- ☐ Electronic Concerns Form Updated?
- ☐ Safeguarding Officer / SLT notified?
- ☐ Parent notified?

Guidance

To be completed by the person who has seen the injuries themselves – to avoid discrepancies in reporting. This should not be completed over the phone. The body map should be used to document and illustrate visible signs of harm and physical injuries.

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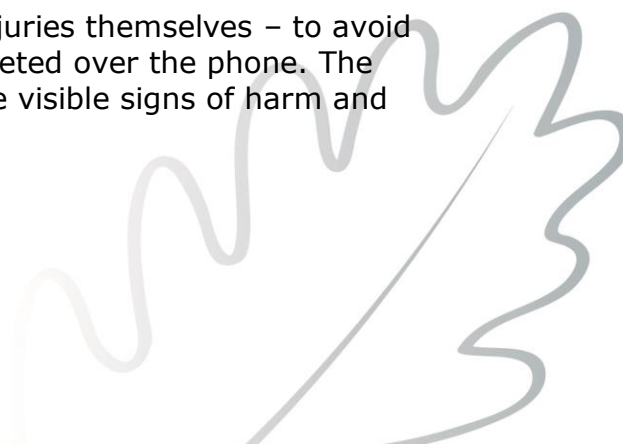
Clearly indicate the location of the injuries on the body map using black pen. Please also note the size (ruler below for guidance), colour and type of injury in the "description of injury" section.

Please take care recording details as this document could be used as evidence.
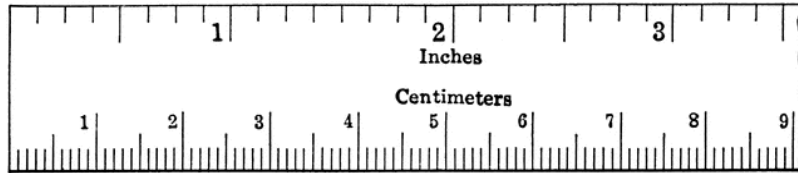
Appendix I

Safer recruitment and selection of staff

Oak Learning Partnership is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so.

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Oak Learning Partnership will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

The Headteacher and School Business Manager will ensure that there are sufficient staff/QEB members who have undertaken appropriate Safer Recruitment Training in the last 3 years to enable at least one person on every recruitment panel to be appropriately trained.

The Headteacher and Governing body will ensure that all external staff and volunteers, contractors including out of hours organisations using our school and college sites have been recruited safely, including DBS checks as appropriate.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Single central record (SCR)

The Trust keeps an SCR which records all staff, including agency and third-party supply staff, contractors and teacher trainees on salaried routes, who work at the school.

The Trust's SWCR contains information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18 (college only)
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. Risk assessments will be undertaken for all volunteers.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

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