

SAFEGUARDING AND CHILD PROTECTION POLICY

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Introduction

The safety and well-being of the children in the Trust's schools is our highest priority and we always seek to act in the best interests of each child. Our aim is to provide secure and caring environments so that they can learn in safety.

We recognise our duty under the Education Act 2002 to safeguard and promote the welfare of pupils in our schools, in accordance with the guidance set out in *Keeping Children Safe in Education* (Sept 2021) [hereafter KCSIE]. This policy has been developed to ensure that all adults across the Trust are working together to safeguard and promote the welfare of children and young people. We aim to create a culture of vigilance.

Safeguarding and promoting the welfare of children are the responsibility of **all individuals working in or for the Trust, including all teaching and non-teaching staff, residential and part-time staff, supply staff, trustees, local governors, volunteers and contractors. All references to 'staff' in this policy should be interpreted as applying to the aforementioned unless otherwise stated.**

Everyone who comes into contact with children has a role to play in promoting their welfare, identifying safeguarding concerns, sharing information and taking prompt action when necessary. Everyone should be aware that safeguarding incidents can happen at any time and in any location and are duly required to be alert to any possible concerns. By adopting the approach 'it could happen here' we believe our increased vigilance will help to keep our children safe.

This policy applies to all the educational settings within the Trust: Haveley Hey Community School, The Willows Primary School and The Bridge Playgroup (provision for 2-year-old children). Appendix D contains a full set of contacts, including details of relevant post holders; it also contains contact details for other relevant organisations and agencies.

We shall work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address them.

Safeguarding and promoting the welfare of children and young people go beyond implementing basic child protection procedures. They are integral to all activities and functions of our schools and are incorporated into school policies, including the Staff Code of Conduct, Whistleblowing Policy, Anti-bullying Policy, Acceptable Use Policy, Behaviour Policy, Health and Safety Policy, Medicines Policy and associated protocols, Trips and Visits policy, Dealing with Allegations Against Staff and Volunteers Policy, Toileting Policy (Intimate Care), Online-Safety and Safer Recruitment Policy.

In all matters relating to safeguarding, we shall refer to the procedures laid down by Manchester Safeguarding Children Partnership (MSCP), and have regard to relevant DfE guidance, including *Working Together to Safeguard Children (September 2018)* (hereafter, WTSC), *Prevent Duty Guidance for England and Wales 2015* (hereafter *Prevent Duty Guidance*), and KCSIE. The latter can be found here:

www.gov.uk/government/publications/keeping-children-safe-in-education--2.

We recognise that our duty is to safeguard and promote the welfare of all our children in a manner which respects the dignity, privacy and beliefs of all and without discrimination on the basis of gender, race, ethnicity, religion, sexual orientation or disability. This includes children who are in need (Section 17, Children Act [1989]) and children who are at risk of harm (Section 47, Children Act [1989]).

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

The Head of School in each school has the ultimate responsibility for safeguarding and promoting the welfare of children and young people in their school and playgroup. Implementation on a day-to-day basis is delegated to the Designated Safeguarding Lead (hereafter DSL), who is a member of the School Leadership Team, supported by a Deputy DSL. (See Appendix D for contact details.)

This policy is reviewed annually by the Trust Board, and is kept under review by the DSL and the Trust's Safeguarding Committee.

Our Rights Respecting Ethos

We aim to create and maintain a safe learning environment where all children and adults feel safe, secure and valued, and know they will be listened to and taken seriously.

We are committed to Unicef's Rights Respecting Ethos, and implement policies, practices and procedures which promote safeguarding and the emotional and physical well-being of children. This policy reflects our commitment to supporting children to have their right:

- To be supported to live and grow (Article 6)
- To say what they think should happen and be listened to (Article 12)
- To be looked after and kept safe (Article 19)
- To be looked after properly if they can't live with their own family (Article 20)
- To live in the best place for them if they can't live with their parents (Article 21)
- To have access to good food and water and see a doctor if they are ill (Article 24)
- To learn and go to school (Article 28)
- To be protected from doing things that could harm them (article 36)

Safeguarding and child abuse

Safeguarding children consists of the following:

- protecting children from maltreatment
- preventing impairments 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.

Definitions and signs of possible child abuse are covered in all Level 1 staff training; see Appendix A for more information about types and signs of possible abuse.

What to do if you have concerns over a child's safety and welfare

The safeguarding of children is our highest priority, and we recognise the additional role the School has to play in the referral of children who are suffering or are likely to suffer significant harm.

All staff (including supply staff), volunteers and visitors have a duty to report to the DSL any concerns about the welfare and safety of a child, and all such concerns must be taken seriously. Where a child is suffering or is likely to suffer significant harm, the DSL must be informed immediately.

The Designated Safeguarding Lead (DSL) is most likely to have the complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. Where the DSL cannot be contacted immediately, this discussion can take place with the Deputy DSL or another member of the safeguarding team.

It is vital that, after reporting to the DSL, the person concerned continues to monitor the child's safety and welfare.

Where concerns remain, the person should remain in contact with the DSL to ascertain what action is being taken. If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should press Children's Social Care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should understand that they can refer a child directly to Children's Social Care, especially where they are concerned that a child is suffering or likely to suffer significant harm. Indeed, there is a duty on all staff to persist with referrals to Children's Social Care if they feel appropriate action is not being taken.

Information sharing is vital to good safeguarding.

If a child is in danger or is at imminent risk of significant harm, a referral must be made to Children's Social Care and/or the police immediately.

It is important at all times to keep an open mind about a child's safety and welfare and never assume that safeguarding issues are confined to certain individuals, families or settings. It is particularly important to avoid making assumptions about a child based on personal perceptions of his or her domestic circumstances and family members. Being familiar with the types and signs of abuse set in Appendix A is a key part of this.

Guidance as to how to respond to allegations of child abuse against a member of staff is set out in the Dealing with Allegations Against Staff and Volunteers Policy, which is available from the main school office. Any member of our community who raises a concern over the safety and welfare of a child can be confident that he or she will always be fully supported by the School.

Staff must have regard to the *Greater Manchester Safeguarding Children Procedures* (hereafter, GMSCP), which are adopted by the Manchester Safeguarding Children Partnership. These can be downloaded here:

The flowchart in Appendix E provides further guidance.

How to record and report a concern

Anyone who has concerns over a child's safety or welfare, including suspicions of child abuse, must make a prompt, clear and accurate record. Concerns should be noted using the School's safeguarding proforma or electronic recording system (CPOMS) as soon as is reasonably practical after they have arisen, including details of particular incidents and conversations. This record should also include:

- The date and time of any observation or disclosure
- A detailed factual account of any incident, including verbatim comments
- Details of the child's appearance, behaviour, emotional state and actions

A written record must be made of all concerns, decisions based on those concerns and the reasons for those decisions. Records of concern should be passed as soon as possible to the DSL. A sample proforma is provided in Appendix F but usual practice is to record information on CPOMS.

Under no circumstances, however, should a person attempt to investigate his or her concerns. Staff must be aware that other agencies are responsible for undertaking child protection investigations and that inappropriate investigation by others, no matter how well-meaning, could undermine the work of these other agencies.

Staff should understand that children may not feel ready or may not know how to tell someone they are being abused. They may be embarrassed, humiliated or threatened not to tell anyone about their abuse. Their vulnerability, disability, sexual orientation or any language barriers could also be reasons why they don't tell anyone about their abuse. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

How to deal with a disclosure by a child

Any person who receives a disclosure from a child which raises concerns over the safety and welfare of a child must listen to the child, provide reassurance and record the child's statements in his or her own words using CPOMS.

Under no circumstances should the person ask leading questions or record anything other than the child's own statement. Any questioning must be limited, therefore, to the minimum necessary for purposes of clarification.

Absolute guarantees of confidentiality must not be given to the child. Instead, the child should be reassured that they are being taken seriously and will be supported to keep safe and told that the matter will be referred to an appropriate person in a position of responsibility who will be able to help.

Confidentiality and information sharing

All staff and volunteers must:

- understand that timely information sharing is essential to effective safeguarding.
- be clear with children that they cannot promise confidentiality.
- ensure that confidentiality protocols are followed and information is shared appropriately. The Executive Headteacher, Head of School and DSL disclose any information about a pupil to other members of staff on a need-to-know basis only.
- understand that they have a professional responsibility to share information with other agencies in order to safeguard children.
- practitioners are allowed, under the Data Protection Act, to share information without consent if (a) it is not possible to gain consent, (b) they cannot be reasonably expected to gain consent, or (c) if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All child protection records are kept securely in the main school office and on the secure online system, CPOMS, and are separated from routine student records. Access is restricted to members of the safeguarding team: the DSL, Deputy DSL, Executive Headteacher and Head of School. Where pupils move to new schools, the DSL will ensure their child protection files will be transferred securely and a confirmation of receipt requested. The handling and destruction of such files will be in accordance with the Information Commissioner's guidance.

The requirements of the Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.

Referring cases to Children's Social Care

The decision to refer concerns over a child's safety and welfare to Children, Families and Social Care will normally be taken by the DSL. **However, anyone can make such a referral directly.** If it is necessary to consult outside the School, they should speak in the first instance to staff at the MCC Contact Centre (using the CFSC contact numbers in Appendix D of this policy).

The School will always make a referral where:

- A child is in immediate danger or suffering or likely to suffer significant harm
- A child is likely to benefit from family support services (with the agreement of the child and/or a person with parental responsibility).
- Assessments of children will consider whether wider environmental factors are present in a child's life which are a threat to their safety and/or welfare.

Where it is known that CFSC is already involved with the child and/or his or her family, the DSL will inform Children's Services of new concerns.

Referrals are made initially by phoning in a concern to the Contact Centre (phone number in Appendix D) where the call will be taken by specialist social care and early help staff who will take details and decide on the next course of action.

Supporting documentation should be sent securely to the relevant Contact Centre or equivalent, either through a secure email or as a password protected attachment.

Parents/carers are unlikely to be told that a referral is being made if sexual abuse or fabricated illness is suspected. In such cases, advice will be sought initially from the appropriate agencies.

Members of staff are aware that they must not discuss any issues with parents/carers unless they are told to do so by an appropriate person.

Informing parents/carers

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

Parents and carers will normally be informed if a referral is to be made to the Children, Families and Social Care or any other agency.

However, parents/carers will not be informed if it is believed that by doing so would put the child at risk. In such cases the DSL or Executive Headteacher will seek advice from CFSC.

Child Protection conferences and core group meetings/child in need meetings

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

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

Early help and multi-agency working

Early help, as outlined in Chapter 1 of WTSC, is a means of providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising, e.g. if it is provided as part of a support plan where a child has returned home to their family from care.

Effective early help relies upon the School, local agencies and the family working together to:

- identify children and families who would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve significantly the outcomes for the child.

The Manchester Safeguarding Children Partnership (MSCP) publishes a **threshold document** that includes:

- the process for early help assessment and the type and level of early help services to be provided.

- the criteria, including the level of need, for when a case should be referred to local authority Children's Social Care for assessment and for statutory services under (a) section 17 of the Children Act 1989 (children in need) and (b) section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm).

The MSCP produces **detailed guidance** on the early help process. See Appendix B for further details.

Where concerns over a child's safety and welfare do not meet the criteria for immediate referral to Children, Families and Social Care, the School will follow the relevant detailed guidance (as above) on early help and multi-agency working. Typically, this will result in the submission of an Early Help Assessment or Referral to the Multi Agency Service Hub for triage.

In 'borderline' cases (i.e. where it is not immediately clear which route to follow), the School will consult the relevant Children Families and Social Care First Response Team for advice. However, regardless of the precise details of a response in any particular case, the School will always respond to concerns over a child's safety and welfare on the premise that concerns must be always shared.

It is to be hoped that in each case early help will improve the welfare of the child. However, each case will be kept under review, and consideration will be given to a referral to Children's Social Care if the child's situation does not appear to be improving.

The DSL is responsible for ensuring early help cases are managed effectively by the School.

The Virtual School Head

Virtual school heads should identify and engage with key professionals with relationships with children who have social workers or have previously had social workers or who are LAC, helping them to understand the role they have in improving outcomes for children.

Staff need to be aware of how LGBTQ+ children can be targeted by other children, and need to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff

The curriculum

All children have access to an appropriate curriculum, differentiated to meet their needs. This enables them to learn how to keep themselves safe in real life and online, and to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life. We encourage children to recognise when they are at risk and how to get help when they need it.

Children and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote respect and empathy for others. There is access to information and materials

from a diversity of sources which promote social, spiritual and moral well-being and physical and mental health.

Lessons on Personal Health and Social Education, Relationship and Sex Education, Citizenship, Religious Education, online safety and our Rights Respecting work provide opportunities for children and young people to discuss and debate a range of issues including lifestyles, forced marriage, family patterns, religious beliefs and practices and human rights issues.

All pupils will know that they can approach with confidence any adult in the School if they are in difficulty or feeling worried, and that their concerns will be taken seriously and treated with respect.

Online safety and the use of mobile technology

Online-safety is a safeguarding issue, not an ICT issue. It is our duty to ensure that every child and young person in our care is safe, and this applies equally to the 'virtual' or digital world.

The internet is an essential element in 21st century life for education, business and social interaction, and we have a duty to provide children and young people with quality access as part of their learning experience. The purpose of internet use in school is to help raise educational standards, promote pupil achievement and support the professional work of staff, as well as enhance the School's management of information and business administration.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust systems in place to ensure the online safety of children, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (referred to below as 'mobile phones' and smart watches).
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The four key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual

sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or *financial scams*

To meet our aims and to address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Support parents with online safety by regular communications to reinforce the importance of children being safe online. Make parents aware of school systems to filter and monitor online use. Make parent aware of what their children are being asked to do online, including the sites they will be asked to access and to be clear who from the school their child is going to be interacting with online.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) when using the school's IT systems and regularly monitor their effectiveness. School computers are only used under supervision and usage is monitored by the filtering software. School receives weekly Sophos reports from One Education with details of any attempts made to access inappropriate sites. See DfE Filtering and monitoring standards (DfE 20236)
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community including cyber-crime and security

Attendance and exclusions

Being absent, as well as missing from education, can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

In accordance with each School's attendance policy, absences are rigorously pursued and recorded. The school/playgroup setting, in partnership with the appropriate agencies, takes action to pursue and address all unauthorised absences in order to safeguard the welfare of children and young people in its care.

As part of safeguarding measures, school requests three contact numbers from parents/carers upon admission.

The attendance policy identifies how individual cases are managed and how we work proactively with parents to ensure that they understand why attendance is important. In certain cases this may form part of an Early Help Assessment or a Parenting Contract.

We implement the statutory requirements in terms of monitoring and reporting children missing education (CME) and removing children from roll, and understand how important this practice is in safeguarding children and young people.

We shall only place young people in alternative educational provision which has been quality assured by the Local Authority. Young people who require access to alternative provision will have a personalised learning plan designed to meet their needs. Their attendance will be monitored by each school in accordance with the School Register Regulations.

The DSL is always informed when a fixed-term or permanent exclusion is being discussed and any safeguarding issues will be considered. Where it is felt that a child is likely to be permanently excluded, a multi-agency assessment will be instigated to ensure that there is improved understanding of the needs of the young person and their family and that the key agencies are involved.

Safer recruitment

Our Safer Recruitment Policy, which adheres to the DfE guidance set out in KCSIE 2023, outlines our procedures to achieve safer recruitment. Relevant staff and governors are trained and updated regularly on safer recruitment practices. In accordance with KCSIE 2023 COSST will inform shortlisted candidates that online searches may be done as part of pre-recruitment checks.

Working with other agencies

We have developed effective links with other relevant agencies and co-operate, as required, with any enquiries regarding child protection issues. The School will notify CFSC if:

- A child subject to a child protection plan is about to be permanently excluded.
- There is an unexplained absence of a pupil who is subject to a child protection plan of more than two days from school.

- It has been agreed as part of any child protection plan or core group plan.

Calling the police

Where appropriate, when a serious incident has occurred which may potentially involve criminal behaviour, the School shall seek guidance from the police. On occasion the police will be content that low-level incidents can be dealt with and resolved internally. In making a decision to involve the police, the School will follow the guidance [here](#).

The pupil who is the victim in any incident will be supported and protected as a priority. Any pupil who is suspected of being the offender will also need to be supported. There will often be significant circumstances in a young person's life which are contributing factors to an incident and it is important that these are taken into consideration. In making a judgement on the seriousness of the incident, the level of harm and the circumstances leading to the incident will need to be carefully considered.

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the School will cease its own investigation, having asked only enough questions to establish factual accounts of what happened.

Every effort will be made by the School to preserve any relevant evidence.

Looked-after children (Our Children) and previously looked after children

The School has a designated and appropriately trained teacher for looked-after children. All staff are made aware that looked-after children are especially vulnerable. Staff have a duty of care as 'corporate parents' to be vigilant to changes in their needs and address them quickly by sharing information and passing on concerns immediately. The designated teacher has responsibility to ensure agencies work together to safeguard children.

Key staff are made aware of pupils who are under a special guardianship order, or have been previously looked after, and any specific needs they may have.

Training for staff and volunteers

All staff and volunteers are required to read Part 1 of KCSIE (and sign to confirm that they have done so). Training is provided for all staff and volunteers. Induction training includes basic safeguarding information about policies and procedures, signs and symptoms of abuse (emotional and physical), how to manage a disclosure from a child, as well as when and how to record a concern about the welfare of a child.

All staff and volunteers receive basic Level 1 training which is updated by refresher training at least every 3 years.

The DSL and Executive Headteacher receive Level 3 training or above and receive refresher training every two years.

Staff receive additional training or briefings on particular safeguarding issues, for example, sexual violence and harassment, guns and gangs, forced marriage, domestic abuse and child sexual exploitation and female genital mutilation, as and when appropriate.

It is the responsibility of DSL to ensure that training is in accordance with latest advice provided by MSCP and other relevant agencies.

Use of mobile phones and cameras

The use by staff and other adults of personal mobile phones, and cameras is forbidden when children are present. Further details are provided in the Staff Code of Conduct.

Arrangements for handling allegations made against and/or concerns raised in relation to teachers (including supply teachers, other staff, volunteers and contractors).

The Trust is committed to promoting an open and transparent culture in which all concerns about the behaviour and conduct of staff are dealt with promptly and appropriately. It aims to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

There are two levels of allegation or concern:

1. Allegations that may meet the 'harms threshold'.
2. Allegations/concerns that do not meet the harms threshold, hereafter referred to as 'low level concerns'.

All allegations against or, concerns over, the behaviour of staff (as defined above) will be dealt with according to the Trust's Dealing with Allegations Against Staff, Supply Staff and Volunteers policy (available from the main school office), which follows the guidance in KCSIE and the Greater Manchester Safeguarding Children Procedures (GMSCP). Such allegations or concerns should be reported immediately to the Executive Headteacher or, in their absence, the Chair of Governors. Where the allegation relates to the Executive Headteacher, it should be reported directly to the Chair of Governors, without the Executive Headteacher being informed; the Chair of Governors will then contact the LADO to seek guidance.

Whoever is in receipt of the allegation will decide whether the criteria have been met for an immediate referral to the LADO for an initial discussion. In cases where this is not clear, the allegations or concerns in the first instance will be raised informally with the LADO without identifying individuals. The role of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working at the School. The LADO contact details are published in Appendix D.

Allegations against a member of staff who is no longer believed to be working with children will be referred directly to the police when a criminal offence is suspected.

The harms threshold

A referral will always be made whenever the allegation meets one or more of the following criteria, collectively referred to as 'the harms threshold':

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

The last bullet point above includes behaviour which may have happened outside of school that might indicate that an individual is unsuitable to work with children. This is known as transferable risk.

Low-level concerns

Low-level concerns are concerns about the conduct of members of staff which do not meet the 'harms threshold'. The term 'low-level' does not imply that the concerns are trivial or insignificant. Indeed, identifying and addressing low-level concerns is vital to creating a non-permissive environment in which strong and effective safeguarding systems are maintained. 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 a member of staff has behaved in a way that:

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

Examples of low level concerns include:

- Being 'overly friendly' with children
- Having favourites
- Taking photographs of children on their mobile phone contrary to school policy
- Engaging with a child on a one to one basis in a secluded area behind a closed door
- Humiliating pupils

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Staff are encouraged to self refer, where, for example, 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.

Reports about supply staff and contractors will be notified to their employers, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. All low-level concerns will be recorded in writing. The record will include the details of the concern, the context in which the concern arose, and action taken. The Executive Headteacher will speak directly to the person who raised the concern, unless it has been raised anonymously, to the individual involved and to any witnesses. The information gathered will be used to determine

what further action may be required. Records of low-level concerns will be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, this will be dealt with either through the School's internal procedures or, where a pattern of behaviour moves from being a concern to meeting the harms threshold, through a referral to the LADO.

Serious case reviews

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

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

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

Safeguarding roles and responsibilities

Staff and volunteers

All staff who work directly with children will read and understand Part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

Staff who do not work directly with children will read Annex A of KCSIE.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff (including supply staff) and volunteers within school have a responsibility to:

- Remain vigilant regarding possible safeguarding and child protection issues.
- Be aware that safeguarding incidents could happen anywhere and that staff have a duty to raise concerns, following the procedures in this policy.
- Report, as soon as possible, to the DSL their concerns over a child's safety and welfare, regardless of whether or not they have received a disclosure. (Outside of school hours the DSL or another member of the Safeguarding Team can be contacted by email or by phone.)
- Report any safeguarding concerns or allegations about adults in the school to the Executive Headteacher
- Report directly to the Chair of the Trust any safeguarding concern or allegation regarding the Executive Headteacher **without informing the Executive Headteacher**. (See Appendix D for contact details for the Chair of the Trust.)

- Ensure that a referral to CFSC and/or the police is made immediately if a child is in danger or is at imminent risk of significant harm. This can be undertaken by any member of staff, although it is usually via the DSL. Contact details are provided in Appendix D.
- Follow the procedures laid out in the Whistleblowing Policy if they have concerns about the handling of safeguarding in the School.

The Executive Headteacher

The Executive Headteacher of the Trust will ensure that:

- The policies and procedures adopted by the Trust to safeguard and promote the welfare of pupils are fully implemented and followed by all staff, including volunteers.
- Safer Recruitment procedures are followed in the selection of staff and volunteers.
- A designated member of the Senior Leadership Team is identified as the Designated Safeguarding Lead (DSL) for child protection and receives appropriate on-going training, support and supervision.
- A Designated Deputy to the DSL is identified and receives on-going training, support and supervision
- The content of staff training is updated regularly and include expectations, roles and responsibilities in relation to filtering and monitoring.
- The Head of School is trained appropriately and is able to deal with safeguarding matters when necessary.
- Sufficient time and resources are made available to enable the DSL to discharge his or her responsibilities, including attending inter-agency meetings, contributing to the assessment of children and young people, supporting colleagues and delivering training as appropriate.
- All staff and volunteers receive appropriate training which is updated every three years.
- All temporary staff and volunteers are made aware of the School's safeguarding policy and arrangements.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to the safeguarding and welfare of the pupils.
- All safeguarding concerns are addressed sensitively and effectively.
- Parents/carers are aware and have an understanding of the School's responsibilities to promote the safety and welfare of its pupils by making its obligations clear in school publications including the website.

The Designated Safeguarding Lead

The DSL has a specific responsibility for championing the importance of safeguarding and promoting the welfare of pupils registered in the School and playgroup. The DSL, assisted by the Deputy DSL, will:

- Be the first point of contact with regards to all safeguarding matters.
- Ensure that all staff and volunteers receive information on safeguarding policies and procedures from the point of induction.
- Ensure that all staff and volunteers understand and are aware of the School's reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Support staff to make effective referrals to the CFSC and any other agencies where there are concerns about the welfare of a child.

- Provide support and training for staff and volunteers and make sure that they receive Level 1 refresher training every three years.
- Ensure that any staff with specific additional responsibility for safeguarding children receive at least Level 3 training.
- Ensure that all staff should receive training in the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Ensure their own training is updated every two years.
- Keep and maintain records of staff, governor and volunteer training.
- Monitor and evaluate the effectiveness of staff training.
- Keep copies of all referrals to CFSC and any other agencies related to safeguarding children.
- Manage and keep secure the School's safeguarding records.
- Send a pupil's child protection or safeguarding file separately from the main file to a new establishment if a pupil leaves the school. Keep a copy of the file if the child leaves outside the usual transition dates.
- Liaise with the LADO and attend local meetings.
- Ensure that the School's actions are in line with the MSCP Inter-Agency procedures. (Guidance on these procedures may be found here: www.manchestersafeguardingpartnership.co.uk/.)
- Provide relevant information to the LA on how the School carries out its safeguarding duties, including reviewing and updating annually the information about the School using the MCC safeguarding audit tool.
- Liaise with the Executive Headteacher about any safeguarding issues.
- Keep the Trust's Safeguarding governor and the Safeguarding Committee briefed regarding safeguarding in the School.
- Keep up to date with changes in local policy and procedures and be aware of any guidance issued by the DfE concerning safeguarding.
- Ensure that the Safeguarding Policy is reviewed and updated at least annually, and ensure it is available and accessible to all staff.
- When necessary, during holidays and out-of-schools hours, refer safeguarding concerns to the contact centre run by MSCP. (See contacts in Appendix D.)
- Promote positive educational outcomes for all pupils, including those impacted by disadvantage and adverse childhood experiences, and those who need additional support from statutory agencies.
- Through the work of the Safeguarding Team, the DSL is responsible for sharing with the relevant staff information about welfare, safeguarding and child protection issues which pupils, particularly those with a social worker, are experiencing or have experienced. The DSL will ensure that relevant staff know who these pupils are, understand their academic needs and attainment, and maintain a culture of high aspirations for them. The DSL will support teaching staff in identifying the challenges which these pupils might face and the additional academic support and adjustments which could be made to best support them.

The Board of Trustees

The Governors on the Trust Board will ensure that:

- Children in the Trust's schools are safeguarded through the implementation of this policy.

- A member of the Board is identified as the Trust governor responsible for safeguarding and receives appropriate training. The identified governor will provide the Board with appropriate information about safeguarding and liaise with both the DSLs, seeking termly updates. The as the Safeguarding Committee.
- The safeguarding policy is regularly reviewed and updated and the Trust complies with local safeguarding procedures and other relevant policies, including whistleblowing.
- All Trust and local governors attend appropriate safeguarding training at induction which should be regularly updated
- All trust and local governors ensure there are sufficient governors with Safer Recruitment training.
- It receives an update each term from the Trust Safeguarding governor, along with the minutes of the termly meetings of the Trust's Safeguarding Committee.
- The appointment of the DSL is approved on recommendation from the Executive Head Teacher.

The Safeguarding Committee of the Trust will ensure that:

- Safer Recruitment and selection practices are followed, including appropriate use of references and DBS checks on new staff and volunteers in line with KCSIE.
- Procedures are in place for dealing with allegations of abuse against members of staff and volunteers, and these are in line with Local Authority procedures.
- All staff and volunteers who have regular contact with children and young people receive appropriate training which is updated by refresher training at least every 3 years.

Safety On and Off Site

- Our site is secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.
- All visitors, including visiting speakers, are subject to our safeguarding protocols whilst on site and will be supervised at all times, if no checks have been obtained.
- We will ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. We are responsible for determining the appropriate level of supervision depending on the circumstances. We will always check the identity of contractors and their staff on arrival at the school or college.
- All school trips are fully risk assessed and no child will be taken offsite without parental permission.
- We have a Health & Safety policy
- Where an individual or organisation uses school premises, as with all safeguarding allegations, school should follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

Appendix A

Child abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Some of the main forms of child abuse are set out below but staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label.

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-child abuse) in education and all staff should be aware of it and of the School's policy and procedures for dealing with it.

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

Domestic abuse

Children's development, as well as their social and emotional resilience, is affected by many factors, including exposure to domestic abuse within the family situation and is a safeguarding issue.

Children who witness domestic abuse are also victims. They may see, hear, or experience the effects of abuse at home and/ or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Domestic abuse can be physical, sexual, psychological or emotional.

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

Child abuse, however, can take other forms, including so-called, 'honour-based' abuse, female genital mutilation (FGM), child sexual exploitation (CSE) Child-on-child abuse (including sexual abuse) and radicalisation and violent extremism. Further details of our approach to these and other specific safeguarding issues are set out in greater detail in **Appendix C**.

Signs of possible child abuse

The following signs may or may not be indicators that abuse has taken place. The lists are not exhaustive and the categories are not mutually exclusive. There will often be overlap. Consequently, any person with responsibilities under this policy **must** share their concerns with the DSL.

- **Signs of possible physical abuse:** any injuries not consistent with the explanation given for them; injuries which occur to the body in places which are not normally exposed to falls or rough games; injuries which have not received medical attention; reluctance on the part of a child to change for, or participate in, games or swimming; bruises, bites, burns and fractures which do not have an accidental explanation; object shaped bruises; inconsistent accounts given by the child for the cause of injuries.
- **Signs of possible emotional abuse:** depression, aggression, extreme anxiety, changes or regression in mood or behaviour; obsessions or phobias; sudden

underachievement or lack of concentration; seeking adult attention and not mixing well with other children; negative statements made by the child about him or herself; acts of aggression or cruelty to others; extreme shyness or passivity; stealing and lying

- **Signs of possible sexual abuse:** any allegations made by a child concerning sexual abuse; excessive preoccupation by the child with sexual matters and age-inappropriate knowledge of adult sexual behaviour; regular engagement in age-inappropriate sexual play; sexual activity through words, play or drawing; repeated urinary infections or unexplained stomach pains; eating disorders.
- **Signs of possible neglect:** dirty skin, body smells, unwashed, uncombed hair and untreated lice; clothing that is dirty, too big or small, or inappropriate for weather conditions; frequent occurrences where the child is left alone or unsupervised; frequent diarrhoea, tiredness and/or hunger; untreated illnesses, infected cuts or physical complaints; overeating.
- **Signs of possible child sexual exploitation:** sexual exploitation can be very difficult to identify. Young people who are being sexually exploited may be involved in abusive relationships, intimidated and fearful of certain people or situations; hang out with groups of older people, or anti-social groups, or with other vulnerable peers; associate with other young people involved in sexual exploitation; get involved in gangs, gang fights, gang membership; have older boyfriends or girlfriends; spend time at places of concern, such as hotels or known brothels; not know where they are, because they have been moved around the country; go missing from home, care or education. They may also show additional signs of sexual abuse or grooming. such as:
 - appearing with unexplained gifts or new possessions
 - associating with other young people involved in exploitation
 - having older boyfriends or girlfriends
 - suffering from sexually transmitted infections or become pregnant
 - suffering from changes in emotional well-being
 - misusing drugs and alcohol
 - going missing for periods of time or regularly come home late • regularly missing school or education or do not take part in education.
- **Signs of possible extremism/radicalisation:** different people display various signs of radicalisation. Some people are able to hide it so well that they are indistinguishable from anybody else, making it hard to identify them as radicalised and understand what their intentions are or could be. The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:

Physical changes: sudden or gradual change in physical appearance; sudden or unexpectedly wearing religious attire; getting tattoos displaying religious or political messages; unexpectedly growing a beard; unexpectedly shaving their head (skinhead);

Possessing unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person).

Social changes: cuts ties with their friends, family or community; starts to become socially withdrawn; becoming dependent on social media and the internet; begins to associate with others who hold radical views; bullies or demonises other people freely; begins to attend rallies and demonstrations for extremist causes; associates with known radicals; visits extremist websites, networks and blogs.

Emotional and verbal changes: begins to complain, often with anger, about governmental policies, especially foreign policy; advocates violence or criminal behaviour; begins to believe in government conspiracies; exhibits erratic behaviour such as paranoia and delusion; speaks about seeking revenge; starts to exhibit extreme religious intolerance; demonstrates sympathy to radical groups; displays hatred or intolerance of other people or communities because they are different.

Children with special educational needs, disabilities or health conditions

Staff must exercise particular vigilance where concerns relate to children with special educational needs or disabilities, as they are particularly vulnerable, and additional barriers can exist in identifying abuse and neglect in this group of children.

These can include:

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

Appendix B

Identifying children and families who would benefit from early help

All staff at the School have a role in identifying emerging problems and potential unmet needs of individual children. All staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share that information and work together to provide children and young people with the help they need. Staff need to continue to develop their knowledge and skills in this area. They have access to appropriate training to identify and respond early to abuse, neglect and complex unmet needs. Training and regular safeguarding updates help them understand their role in identifying emerging problems and sharing information with other professionals to support Early Help Assessment.

The School monitors and evaluates the effectiveness of training and multi-agency training for all early help interventions.

Staff should, in particular, be alert to the potential need for early help for any child who:

- is disabled and has specific additional needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- is showing early signs of mental health problems
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence
- has returned home to their family from care • is exhibiting early signs of abuse and/or neglect.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police), inter-agency assessment will be considered. These early help assessments, such as the Early Help Assessment, identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

If early help is appropriate, where they are not taking the lead, then the DSL will support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment, as appropriate.

If any member of staff identifies a child who would benefit from an early help assessment, they should alert the DSL who will make an initial assessment. A decision will be made about who will provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. This 'lead professional role' may be undertaken by the DSL or Deputy DSL. Decisions about who should be the lead professional will be taken on a case by case basis and will be informed by the needs of the child and their family.

For an early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents or carers. It will involve the child and family as well as all the professionals who are working with them.
- the lead professional should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Local authority CFSC should set out the process for how this will happen.
- if parents/carers and/or the child do not consent to an early help assessment, then the lead professional will make a judgment as to whether, without help, the needs of the child will escalate. If so, a referral into local authority CFSC may be necessary.

Appendix C

Additional specific safeguarding issues

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. Whilst trained professionals are required to diagnose mental health problems, school staff are well-placed to observe children day-to-day and identify those whose behaviour suggests 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.

If staff are concerned about the mental health of a child, they should report this on CPOMS so that it can be addressed by the School Safeguarding Team and/or the School SENDCo (as appropriate). If the concern is of a serious or urgent nature, it should be reported immediately and in person to a member of the Safeguarding Team.

Child-on-child Abuse

All staff are alert to the risk of child-on-child abuse and understand their role in preventing, identifying, and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, or 'banter', and should not develop high thresholds before taking action as this can create a culture permissive of unacceptable behaviours and an unsafe environment for children. They should likewise remember that, even when there are no reported cases, Child-on-child abuse may be happening. All staff should also understand that peer-on-peer abuse can happen outside of school and online and it may involve multiple schools.

We take a zero-tolerance approach to child-on-child abuse and views it as seriously as abuse by adults.

What is Child-on-child abuse?

For these purposes, child-on-child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, sexual harassment and other forms of harmful sexualised behaviour.
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

The sharing of nude images can but does not always constitute abusive behaviour.

What role does gender play?

Child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low-level bullying (where the School's anti-bullying policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

Staff should always be alert to possible signs of abuse. Signs that a child may be suffering from child-on-child abuse overlap with those relating to other types of abuse. They may include

(a) failing to attend school, disengaging in lessons or struggling to carry out school-related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional well-being; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that (a) Child-on-child abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour; (b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; (iii) experienced considerable disruption in their lives.

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks, for whatever reason, that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay. If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police should be made immediately.

How will the DSL respond to concerns of Child-on-Child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and well-being of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services; and (d) a strategy meeting.

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk – while the perpetrator may pose a significant risk of harm to other children, the child may also have considerable unmet needs and be at risk of harm themselves
- take into account the complexity of child-on-child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting.
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and well-being of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and well-being of the victim(s) and other children in the School.
- in the case of a concern about or an allegation against a pupil, the School may suspend the pupil where it deems it appropriate while an investigation takes place.
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in the safeguarding policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's well-being closely and ensuring that support is provided by all

relevant staff members within the School; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term.

- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the School raise awareness of and reduce the risk of Child-on-child abuse?

The School actively seeks to prevent all forms of child-on-child abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Pupils are educated about the nature and prevalence of child-on-child abuse via PSHE. They are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator.

They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and child-on-child abuse.

Staff are trained on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

It is recognised that even if there are few reported cases of peer-on-peer abuse such abuse may well still be taking place but is not being reported. We understand that there may be psychological barriers for young people reporting abuse.

Sexual violence and sexual harassment between children in schools

We take a zero-tolerance approach. The School will respond appropriately to all reports and concerns about sexual violence and harassment, including those outside the school and or online (and incidents that also involve pupils from other Schools.)

In instances of peer-on-peer abuse where pupils are involved in harmful or abusive sexual behaviour, we shall follow the Department for Education Advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (September 2021). This document is accessible [here](#).

The initial response to a report from a child is incredibly important. How staff respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken

seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. Children should understand that the law on child-on-child abuse is there to protect rather than criminalise them.

All staff working with children are advised to maintain an attitude of 'it could happen here'. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) is important: intervention helps prevent problematic, abusive and/or violent behaviour in the future.

Along with providing support to children who are victims of sexual violence or sexual harassment, we will seek to provide the alleged perpetrator(s) with education and safeguarding support, as appropriate, as well as considering appropriate disciplinary sanctions. Staff are alert to the possibility that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the School. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

Sexual violence and sexual harassment can occur:

- Between two or more children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children physically and/ or verbally
- Sexual violence and sexual harassment exist on a continuum and may overlap.
- Online and face to face. Children who are victims of sexual violence and/ or sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Some children may not report abuse, but it may be overheard, and should always be acted on. Staff need to be vigilant for signs of all types of abuse.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) children are at greater risk.

Staff should be aware of the importance of:

- A zero-tolerance approach
- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them they must reassure the child that they are taking the allegation seriously and refer it to the DSL.

Sexual Violence

Staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence in this section of the policy we do so in the context of child on child sexual offences under the Sexual Offences Act, which include rape, assault by penetration, sexual assault (which covers a very wide range of behaviour, so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault), and causing someone to engage in sexual activity without consent.

Sexual harassment

Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school.

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 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
- online sexual harassment which may be standalone, or part of a wider pattern of sexual harassment. It may include: consensual and non-consensual sharing of nude and seminude images, sharing of unwanted sexually explicit content, , sexualized online bullying, unwanted sexual comments and messages on social media platforms, sexual coercion and threats and attempts at sexual exploitation.
- sexually harmful and aggressive behaviour involving the use of mobile phones, such as 'upskirting', where a picture is taken under a person's clothing without them knowing, with the intention of viewing their buttocks or genitals to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. Upskirting was made a criminal offence in April 2021.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is 'harmful sexual behaviour' (HSB). The term has been widely adopted in child protection and is used in this policy. HSB should be considered in a child protection context.

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

stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent. When considering harmful sexual behaviour, the ages and developmental stages of the children involved are always considered.

Youth-produced sexual imagery (sharing of nudes and semi-nudes)

This refers to the creating and sharing of sexual imagery by young people. Creating and sharing nude or semi-nude photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of safeguarding risks which need careful management.

The term ‘youth-produced sexual imagery’ (YPSI) is now used instead of ‘sexting.’ This is to ensure clarity. The types of incidents which this covers are those where a person under the age of 18:

- creates and shares sexual imagery of themselves with a peer under the age of 18
- shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- is in possession of sexual imagery created by another person under the age of 18

As it is a criminal offence to possess, distribute, show and make indecent images of children, any disclosure of information about an incidence of YPSI will always be taken very seriously by the School. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

When an incident involving youth-produced sexual imagery comes to the School’s attention:

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate school staff
- there will be subsequent interviews with the young people involved (if appropriate)
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process if there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to CFSC and/or the police immediately.

An immediate referral to police and/or CFSC will also be made if at this initial stage:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- what is known about the imagery suggests violent content
- the imagery involves sexual acts and any child in the imagery is under 13

- there is reason to believe a young person is at immediate risk of harm because of the sharing of the imagery, e.g. the young person is presenting as suicidal or self-harming.

If none of the above applies, then the School may decide to respond to the incident without involving the police or CFSC. However, the School can choose to escalate the incident at any time if further information/concerns come to light.

The decision to respond to the incident without involving the police or CFSC will be made in cases when the DSL is confident that (a) there is enough information available to assess the risks to pupils involved, and (b) the risks can be managed within the school's pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision will be made by the DSL, in consultation with the Executive Headteacher. Input from other members of staff will be considered, if appropriate. The decision will be recorded, in accordance with school policy.

Any decision will be in line with the School's child protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

During the course of any investigation into YPSI the School will follow the guidance published by the UK Council for Child Internet Safety.

<https://inege.com/2021/01/13/ukcis/>

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Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

For further information, follow these links:

- [gang activity & serious youth violence resource](#)
- [MSB Criminal Exploitation Policy Statement \(issued June 2018\)](#)

Radicalisation and violent extremism

We are committed to protecting children in our schools from the malign influence of violent political and religious extremism. Further, the Trust recognises its obligations under the Counter terrorism and Security Act 2015 (The Prevent Duty) and the importance of acting in accordance with *Prevent Duty Guidance*.

Our Prevent Strategy undertakes to:

- risk assess the likelihood of pupils being drawn into terrorist organisations
- work with parents and community leaders to protect children from being drawn towards violent extremism
- provide appropriate Workshop on the Prevent Strategy (WRAP) training for staff to raise awareness of how to identify children who may be at risk of radicalisation and what can be done to support them.
- work in partnership with the MSCP to protect children who may be at risk
- keep under review our ICT policies to ensure that children are protected from online extremist material
- build our children's resilience, not only through PSHE and other curricular provision, but also the our distinctive ethos and education, equipping them to question and challenge extremist ideologies
- ensure that visiting speakers are appropriately vetted and supervised.

Staff must be particularly vigilant and will report any concerns they have about radicalisation and violent extremism to the DSL. The DSL will then make a referral to the relevant authorities in accordance with Greater Manchester Safeguarding Partnership guidance.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual may be vulnerable to radicalisation.

To support its work in this area, the DSL has received specialist training from relevant external agencies.

So-Called 'Honour-Based' Abuse

So-called 'honour-based' Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse, regardless of the motivation, and should be handled and escalated as such.

If in any doubt, staff should speak to the DSL. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

There is a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on:

- pages 38-41 of the multi-agency statutory guidance on FGM. (Pages 59-61 focus on the role of schools and colleges.)
- pages 13-14 of the multi-agency guidelines on handling cases of forced marriage [here](#).

Members of staff who have a concern regarding a child who might be at risk of HBA must report this to the DSL who will activate local safeguarding procedures, using their protocols for multi-agency liaison with police and social care.

Female genital mutilation (FGM)

All staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Where staff suspect that a girl is at risk of FGM, they must report this to the DSL without delay. The DSL will then activate the relevant safeguarding procedures, using Greater Manchester Safeguarding Partnership document Female Genital Mutilation Multi-Agency Protocol.

Where a teacher discovers that FGM appears to have been carried out on a girl under the age of 18, they have a statutory duty to report this directly to the police. Any teacher failing to report such cases will face disciplinary sanctions. Unless teachers have good reason not to do so, they should discuss any such case with the DSL or children's social care, in accordance with the **Procedures for Dealing with Concerns about a Child** set out elsewhere in this policy. In addition, staff should alert the DSL in the following situations:

- if a girl under 18 appears to be at risk of FGM
- suspected cases (i.e. where the teacher has not discovered that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence)
- in the case of a woman who is 18 or over, any instance of suspected FGM or risk of FGM.

The DSL who will follow local safeguarding procedures.

A summary of the FGM mandatory reporting duty can be found [here](#).

Child sexual exploitation (CSE) and child criminal exploitation (CCE) including county lines

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

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

CSE can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and can be perpetrated in person and online. The abuse can be perpetrated by individuals or groups, males or females and adults or children. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Whilst age may be the most obvious power imbalance, this can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Once again, staff should be especially vigilant to signs and other evidence that a child is or is at risk of becoming a victim of CSE and report their concerns immediately to the DSL. The DSL will then make a referral to the relevant authorities in accordance with agreed inter-agency procedures.

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

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

victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Further information about CCE including definitions and indicators is included in Annex B.

Children, young people or adults who are exploited, coerced or trafficked into committing crimes are victims who require a safeguarding response and access to support. As such, any member of the School who has concerns about an individual who is being exploited, or is at risk of criminal exploitation, should contact the DSL who will follow local safeguarding guidance and share this information with the relevant services. The School will cooperate with statutory agencies to facilitate a coordinated safeguarding response to protect and support children and young people involved in, or at risk of, criminal exploitation.

County lines exploitation

'County lines' is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns. It is a form of criminal exploitation often characterised by gangs using children and vulnerable people to move drugs and money, in the belief that they are less likely to be stopped and searched.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons. The response to tackle it involves the police, the National Crime Agency, a wide range of government departments, local government agencies and VCS (voluntary and community sector) organisations.

The **Children's Society** has produced a [toolkit for working with children and young people trafficked for the purpose of criminal exploitation in relation to County Lines](#). Further information can be found on their website.

How does criminal exploitation affect young people and vulnerable adults?

Like other forms of abuse and exploitation, criminal exploitation can:

- affect any child or young person (male or female) under the age of 18 years
- affect any vulnerable adult over the age of 18 years
- still be exploitation even if the activity appears consensual
- involve force and/or enticement-based methods of compliance, and is often accompanied by violence or threats of violence
- be perpetrated by individuals or groups, males or females, and young people or adults

It is typified by some form of power imbalance in favour of those perpetrating the exploitation, e.g. age, gender, cognitive ability, physical strength, status, and access to economic or other resources.

It is important to remember the unequal power dynamic within which this exchange occurs, and that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. Note also that the prevention of something negative can also fulfil the requirement for exchange, e.g. a young person might engage in county lines activity to stop someone carrying out a threat to harm their family.

A key factor in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (e.g. money, drugs or clothes) and intangible rewards (e.g. status, protection or perceived friendship or affection).

Signs to look out for

A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them.

Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- persistently going missing from school or home and/or being found out-of-area
- unexplained acquisition of money, clothes or mobile phones
- excessive receipt of texts/phone calls
- relationships with controlling/older individuals or groups
- leaving home/care without explanation
- suspicion of physical assault/unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school results/performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being.

For further information, visit:

- the Youth Justice Resource Hub
- the National Crime Agency website
- the Home Office guidance
- the gov.uk website

Any member of staff or parent who has concerns relating to the potential criminal exploitation of a child should contact the DSL as a matter of urgency.

Homelessness

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

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and antisocial behaviour.

Children missing from education

The School is committed to ensuring that its pupils access the educational and other opportunities it provides. In this context, it recognises that a pupil missing education is at significant risk of underachieving, being a victim of maltreatment, including abuse, and suffering a reduction in his life chances when he leaves the School. The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

The School will act in accordance with the guidance provided in KCSIE. In particular, it will inform their local authority of any pupil who is going to be deleted from its admission register where he:

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more.

Modern slavery

Slavery is not an issue confined to history or an issue that only exists in certain countries – it is something that is still happening today. It is a global problem and the UK is no exception. It is a growing issue, affecting men, women and children. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

Reporting modern slavery

There is a duty on schools, along with other public authorities to notify the Home Office where modern slavery is encountered. MGS makes all its staff aware of the safeguarding challenges to children posed by modern slavery and the duty to refer.

There are two routes to reporting: either through a National Referral Mechanism (NRM) form or using an MS1 form.

Where a report needs to be made of a child who has experienced modern slavery:

- the NRM form should be used if the reporting adult gives their consent to be identified; this form should be sent to nrm@nca.x.gsi.gov.uk.
- the MS1 form should be used if the reporting adult wishes to remain anonymous; the form should be sent to dutytonotify@homeoffice.gsi.gov.uk.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines on handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmunit@fco.gov.uk

Non-collection of children

If a child is not collected at the end of the session/day, staff will follow the school protocol for the non-collection of children:

- Take the child to the office area and offer comfort and reassurance
- If appropriate include the child in an afterschool club or the after school provision
- Call all the names on the list of contacts in priority order
- If a social worker is involved, inform the social worker
- Staff may visit the home address to locate parent/carer, whilst child stays safely at school
- If no-one can be contacted after an hour, inform the police and children's services
- Record on CPOMS

Appendix D

School and Trust Contacts

Role	Haveley Hey and The Bridge	The Willows
Executive Headteacher	Sue Spiteri 0161 498 9508 s.spiteri@haveleyhey.manchester.sch.uk	Sue Spiteri 0161 437 4444 s.spiteri@willows.manchester.sch.uk

Head of School	Jordan Davies 0161 498 9508 j.davies@haveleyhey.manchester.sch.uk	Lucy Croke 0161 437 4444 l.croke@willows.manchester.sch.uk
Designated Safeguarding Lead	Jordan Davies 0161 498 9508 j.davies@haveleyhey.manchester.sch.uk	Clare Elliott 0161 437 4444 c.elliott@willows.manchester.sch.uk
Designated Teacher for Looked-after children	Faye Docker 0161 498 9508 f.docker@haveleyhey.manchester.sch.uk	Clare Elliott 0161 437 4444 c.elliott@willows.manchester.sch.uk
Deputy DSL	Marie Kirkham 0161 498 9508 m.kirkham@haveleyhey.manchester.sch.uk	Karen Stott 0161 437 4444 k.stott@willows.manchester.sch.uk
Chair of the Trust	Richard Dyson Can be contacted via Karen Brown, Admin manager and HR support hr@cosst.co.uk 0161 437 4444	
Trust Safeguarding Governor	Vacancy	
Extended Safeguarding Team	Clare Buxton c.buxton@haveleyhey.manchester.sch.uk Lyndsay Young l.young@haveleyhey.manchester.sch.uk Leanne Straker l.straker@haveleyhey.manchester.sch.uk	Gemma Fletcher g.fletcher@willows.manchester.sch.uk Donna Neild d.neild@willows.manchester.sch.uk

Other Important Contacts

Local Authority Designated Officer: Jackie Shaw, who can be contacted on 07508 421 223 or in writing at Ground Floor - R&D Block, Wenlock Way Offices, Wenlock Way, West Gorton, Manchester M12 5DH.

Local authority Children's Social Care:

Manchester 0161 234 5001

Manchester Safeguarding Partnership 0161 234 3330 (mshp@manchester.gov.uk)

<https://www.manchestersafeguardingpartnership.co.uk>

Manchester Contact Centre

(socialcare@manchester.gesx.gov.uk) 0161 234 5001

Police

101 (non-emergency), 999 (emergency)

Prevent and counter-extremism

Helplines for non-emergency advice on religious and political extremism:

Department for Education

020 7340 7264

Police

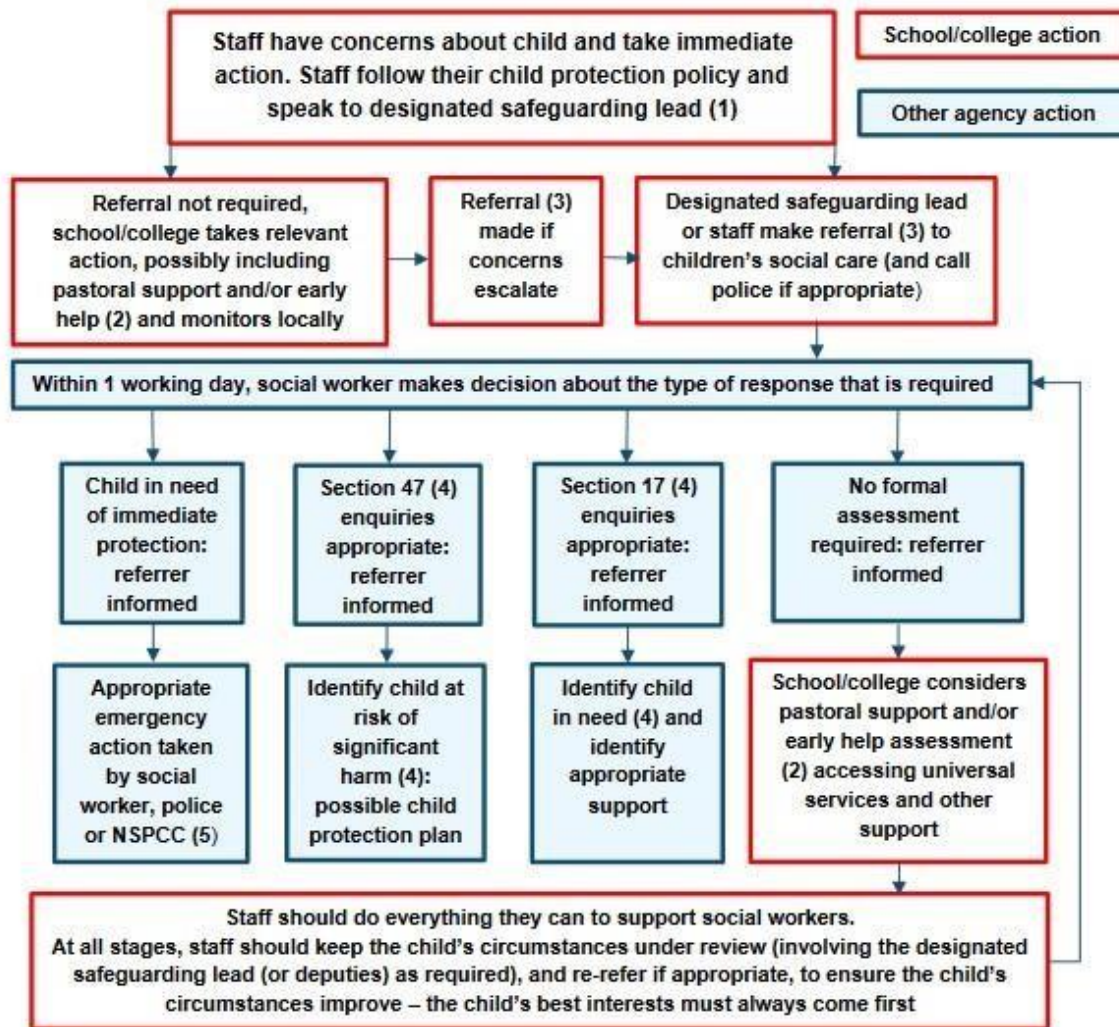
101, counter-extremism@education.gsi.gov.uk.

Additional numbers

Manchester Family Information Service	0800 083 7921
Childline	0800 1111
NSPCC 24/7 Helpline	0808 800 5000
Barnardo's	0800 942 8787
NSPCC FGM Helpline	0800 028 3550
NSPCC Whistleblowing Helpline	0800 028 0285
National Bullying Helpline	0845 22 55 787

Appendix E:

Actions where there are concerns about a child



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

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

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

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

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

Appendix F: sample proforma for reporting a concern

Date:	Time:	Name of referrer:
		Job title:
Child's name:	Class:	Age:
Disability: [if known please specify]	Ethnicity:	Language:
Brief description of work undertaken to support child/young person e.g. assessments, progress, interventions or other agencies involved:		
Concern: Please complete this form as fully as possible stating key areas of concern and continue overleaf if necessary using Skin Map if appropriate.		
(PLEASE CONTINUE OVERLEAF IF NECESSARY)		
Have you spoken to the child's parent/carer?		
Have you spoken to the child?		
If you have not spoken to the child's parent/carer, please state clearly your reasons:		
If you have not spoken to the child, please state clearly your reasons:		
Do you require further support? If you answered yes, please state the support you require.		
Name of Designated Person:	Date referral received:	Time referral received: