

# Child Protection and Safeguarding Policy

**Date: September 2022**

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## Local contacts

ROLE	NAME	CONTACT DETAILS
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Safeguarding Officer	Claire Garner	01706 631246 Ext. 3154 07816096641 <a href="mailto:garnerc@falingepark.com">garnerc@falingepark.com</a>
Chair of governors	Paul Young	01706 631246 Contact L. Fitton at <a href="mailto:fittonl@falingepark.com">fittonl@falingepark.com</a> for P. Young's contact details
Local authority designated officer (LADO) for allegations against professionals	Louise Hurst	0300 3030350 <a href="mailto:Louise.hurst@rochdale.gov.uk">Louise.hurst@rochdale.gov.uk</a>
Education safeguarding officer	Claire Heap	01706 925179 <a href="mailto:Claire.heap@rochdale.gov.uk">Claire.heap@rochdale.gov.uk</a>
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LA Prevent officer	Muhammad Abdulaleem	01706 926437 <a href="mailto:muhammad.abdulaleem@rochdale.gov.uk">muhammad.abdulaleem@rochdale.gov.uk</a>
Headteacher for the virtual school	Christopher Tyler	01706 925209 christopher.tyler@rochdale.gov.uk

## 1. Aims

Safeguarding is the one non-negotiable at Falinge Park High School and we facilitate a whole school approach. We recognise that safeguarding and promoting the welfare of children is everybody's responsibility and that the best interests of the child are paramount. As everyone who comes into contact with children and their families has a vital role to play, this policy has been developed to provide a shared understanding of expectations.

We maintain an attitude that 'it could happen here' where safeguarding is concerned therefore, our school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Systems are in place for children to confidently report abuse knowing that their concerns will be taken seriously and that they can safely express their views and give feedback
- The child's welfare and feelings are taken into account when determining actions and support

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners via Rochdale Borough Safeguarding Children Partnership (RBSCP).

In line with RBSCP requirements, we adhere to Greater Manchester multi-agency safeguarding procedures [Welcome \(proceduresonline.com\)](#) and the Rochdale Children's Needs and Responses Framework - [Rochdale Safeguarding Partnership Board Children's Needs & Response Framework](#)

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

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

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

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

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

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[Domestic Abuse Act 2021](#), which gives a statutory definition of domestic abuse and recognizes the impact on children, as victims in their own right, if they see, hear or experience the effects of abuse

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

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

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

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children

of all forms of domestic abuse. Appendix 1 explains the different types of abuse.

- **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- **Children** includes everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

In Rochdale, our partnership is the RBSCP and our local safeguarding procedures are found at: [Rochdale Safeguarding Partnership Board](#)

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

#### **4. Equality statement**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, child exploitation, forced marriage, or radicalisation

- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Have a social worker (see section 11)
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

All staff at our school will provide safe spaces for all pupils, including those with protected characteristics, to speak out and share concerns.

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 5.1 All staff

All staff will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (Guidance for safe working practice) the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the attendance policy and safeguarding response to children who go missing from education

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging needs, liaising with the DSL, and sharing information with other professionals to enable the right support to be offered to families at the earliest opportunity

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization

The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

The fact that children can be at risk of harm inside and outside of their home, at school and online and that disclosure is rarely a straightforward process.

The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans, (LGBT) or those with other protected characteristics, can be targeted by other children.

What to look for, including non-verbal disclosures, to identify children who need help or protection.

Section 17 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Julia Turrell, Assistant Headteacher. The DSL takes lead responsibility for safeguarding and child protection (including online safety).

During term time, the DSL will be available during school hours either on site or contactable remotely, for staff to discuss any safeguarding concerns. When the DSL is not at school, they can be contacted using the details on the first page of this policy.

When the DSL is absent, the deputies – Simon Ward, Deputy Headteacher, Kate Broadhurst, Safeguarding Officer and Claire Garner, Safeguarding Officer – will act as cover. Their contact details are on the first page of this policy.

Outside of term time, our safeguarding officers are available as is the DSL on a rota system. They can be contacted via their contact details or via [fpssafeguarding@falingepark.com](mailto:fpssafeguarding@falingepark.com)

We recognise the highly challenging role of the DSL and will ensure the DSL has time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour in children and local pathways to access advice, undertake safety planning and support all children involved
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search Further information can be found at [Statutory Guidance Pace Code C 2019](#)
- The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

### **5.3 The governing board**

The governing board will:

Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

Evaluate and approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.

Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

Ensure:

- The DSL has the appropriate status and authority to carry out their job, including time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That school safeguarding responses recognise that children with SEND, or certain medical or physical health conditions, can face additional barriers to abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 17 of this policy has information on how governors are supported to fulfil their role.

#### **5.4 The Headteacher**

The headteacher is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- are informed of our systems which support safeguarding, including this policy, as part of their induction
- understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

Making decision regarding all low-level concerns.

#### **5.5 Virtual school heads**

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

In Rochdale, our Virtual Head is Christopher Tyler, whose contact details are contained at the front of this policy. Chris and his team will identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others to support improving outcomes for vulnerable children.

## 6. Confidentiality

Our school recognises that timely information sharing is essential to effective safeguarding and staff are informed that fears about appropriate sharing of information must never stand in the way of the need to promote the welfare and protect the safety of children. Our staff are aware that they can never promise a child that they will not tell anyone about a report of abuse and that they have a professional responsibility to pass on concerns about a child to the DSL.

School handles personal information about children in line with the provisions of the Data Protection Act (DPA) 2018 and GDPR however, we are clear that this legislation does not prevent or limit the sharing of information for the purposes of keeping children safe. If school is unsure whether it is appropriate for consent to be dispensed with, they will seek advice and consultation with EHASH.

School follows the DfE guidance; [information sharing advice for safeguarding practitioners](#) and [data protection toolkit for schools](#)

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or a deputy).

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Within a school, referrals should be made via MyConcern to the DSL, who has the complete safeguarding picture in relation to children. Therefore if you believe a child is suffering or likely to suffer from harm, you should **immediately** record via MyConcern to notify the DSL and share this information.

In the event that the DSL is unavailable, and a child is suffering or likely to suffer from harm, or is in immediate danger, make a referral to children’s social care and/or the police **immediately**. **Anyone can make a referral**. Tell the DSL as soon as possible if you make a referral directly.

Referrals in Rochdale should be made via telephone in the first instance, to the Complex Early Help and Safeguarding Hub (EHASH) on 0300 303 0440. Advice will be provided about what actions need to be taken, which may include submission of a multi-agency referral form (MARF).

Further information can be found at [Rochdale LA website - reporting concerns about a child](#)

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Reassure the child 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. Never give the child the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment or make them feel ashamed for making a report.
- Explain what will happen next and that you will have to pass this information on. Never promise to keep it a secret
- Log on MyConcern and speak to the DSL as soon as possible
- Make a record of your conversation as soon as possible, using the child's own words. Provide facts, be clear if you are stating your professional opinion. Include information about impact on the child – eg if they are tearful, appear anxious, appear unaffected. Ensure details are precise – date, time, location and give context including what happened prior to the disclosure, was there an identified trigger etc.
- This record should be logged on MyConcern
- Remember if it is an emergency situation and you are unable to locate or contact the DSL (and deputies), make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

## 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'female circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Teachers can obtain support from the DSL, who will also contact EHASH.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately speak to the DSL, who will contact EHASH and Police.

Staff may discover FGM has taken place if a child discloses this to them. They must **never** examine pupils.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures, which may include contacting the Police if there is an immediate risk; [RBSCP multi agency FGM procedure](#)

#### **7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

All staff should be aware that disclosure is rarely straightforward and some children may:

- Not feel ready, or be able to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having 'professional curiosity' and speaking to the DSL if you have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare.

Wherever possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. Share details of any actions you take with the DSL as soon as practically possible.

#### **Early help assessment**

If early help assessment is appropriate, the DSL will generally lead on liaising with other agencies so that a lead practitioner can be identified to undertake an early help assessment. In most cases the lead practitioner within our school will be a member of the DSL team, however other school staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under regular review through supervision and the school will make a referral to local authority children's social care to step the case up if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

## **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

Children's social care assessments should consider where children are being harmed outside the home, so it is important that school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

EHASH will assess referrals against the Children's Needs and Responses Framework and will advise what course of action to take. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, or if there is dispute about the outcome of a referral, the DSL or person who made the referral must follow the Greater Manchester escalation procedures to ensure their concerns have been addressed and that the child's situation improves [RBSCP professional dispute resolution procedure](#)

### **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or deputies are not available, this should not delay appropriate action being taken. Speak to the Headteacher in the first instance or if not available a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputies as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. Schools can seek advice and guidance from the Local Authority Equality and Community Cohesion Officer, Muhammad Abdulaleem on 01706 926437.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related.

## 7.6 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Examples include but are not limited to:

1. Feeling anxious or worried
2. Feeling depressed or unhappy
3. Emotional outbursts
4. Sleep problems
5. Weight or appetite changes
6. Quiet or withdrawn
7. Substance abuse
8. Feeling guilty or worthless
9. Changes in behaviour or feelings

If you have a mental health concern about a child record on MyConcern and follow the steps outlined in section 7.4.

Within school a number of staff have been trained through Mental Health First Aid England and have the skills, knowledge and understanding of first aid for mental health and how to effectively support those experiencing distress:

Senior Mental Health Lead:	J. Allen (Headteacher)
Mental Health Lead:	J. Turrell
Mental Health First Aiders:	A. Abdullah, F. Najib, L. Pottinger and J. Turrell
Wellbeing Champions Lead:	F. Najib

We use the Youth MFA action plan (ALGEE):

**A**pproach the young person, assess and assist with any crisis

**L**isten and communicate non-judgementally

**G**ive support and information

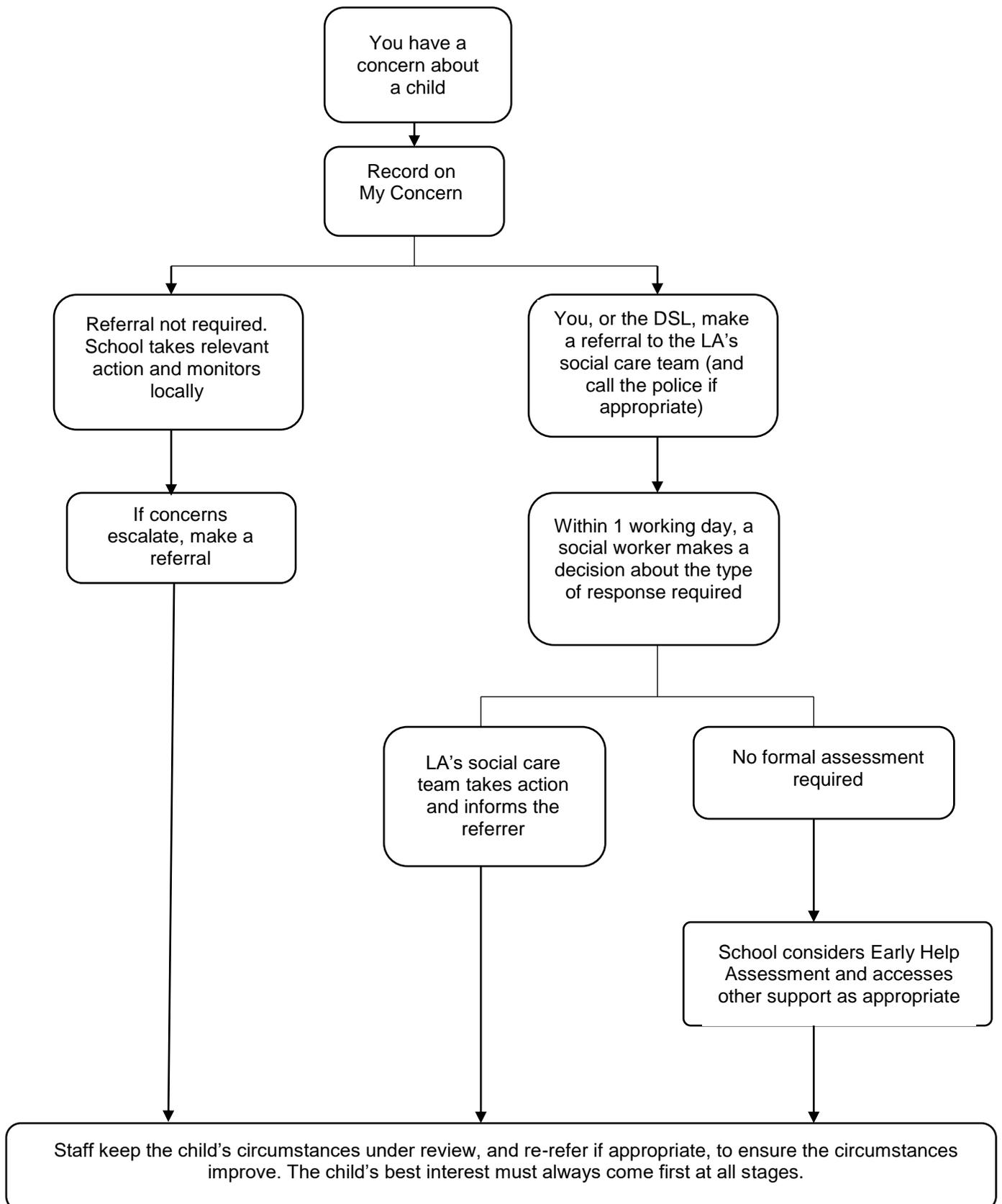
**E**ncourage the young person to get appropriate professional help

## Encourage other supports

Support is also provided for pupils with mental health needs by our Additional Needs team, Pastoral team and Safeguarding team on an individual or small group basis. In addition, school is part of the GM Mentally Healthy Schools pilot and Mentally Healthy Schools Team practitioners work within school.

Where necessary, referrals are made to specialist agencies, including Early Break, educational psychologists, school health, #Thrive and CAMHS (Child and Adolescent Mental Health Services).

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer significant harm or in immediate danger)**



## **7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns, including low-level concerns, about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors. Contact L. Fitton on [fittonl@falingepark.com](mailto:fittonl@falingepark.com) for the chair of governor's contact details.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

## **7.8 Allegations of child-on-child abuse**

We recognise that children are capable of abusing other children, and that it can happen both inside and outside of school and online. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as we are aware that downplaying such behaviours can lead to a culture of unacceptable behaviours, an unsafe environment and a culture that normalises abuse leading to children accepting it as normal and not reporting it.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's compelling behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sharing nudes and semi-nudes).

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation on MyConcern and tell the DSL, but not investigate it
- The headteacher must be informed.

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

Where there is an allegation of developmentally inappropriate behaviour that is harmful or abusive, or if there is a pattern of sexualised behaviour, school will contact EHASH for telephone consultation. If it is clear that a criminal offence has taken place eg sexual assault, school must seek advice from EHASH about how this should be reported to the Police.

The DSL may consult with Youth Justice Team and partner agencies about any concerns related to developmentally inappropriate sexual behaviour at weekly virtual triage meetings.

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will involve considering school transport/travel to and from school, less structured times of the school day eg break time, lunch, after school activities, outdoor learning and educational visits, and assembly and transition times where children may mix more widely. School can seek input and specialist advice from Youth Justice Team, who have expertise in harmful sexual behaviour. The time and location of the incident will also be recorded, and any actions required to make the location safer.

The DSL will contact relevant support services, eg children and adolescent mental health services (CAMHS), HCRG Care (previously Virgin Care) as appropriate. School may seek advice from the Early Help Locality Team about which services may be relevant to support the needs of the children impacted.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Recording every instance of sexualised language as such on SIMS and on MyConcern
- Recording every instance of sexualised behaviour on SIMS and MyConcern with the Headteacher notified
- Being vigilant to sexualised or aggressive touching or grabbing, and initiation or hazing type violence
- Ensuring our response to sexual violence and sexual harassment between pupils of the same sex is equally robust as it is for incidents between pupils of the opposite sex
- Ensuring our curriculum helps to educate pupils about respectful behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring pupils understand that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them
- Ensuring staff understand that pupils may not find it easy to talk about their abuse verbally, and that staff are aware of signs and behaviours that might indicate abuse. Staff may also overhear conversations that suggest a child has been harmed or receive a report from a friend of the child

- Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Ensuring we understand intra familial harms and consider any necessary support for siblings following a report of sexual violence and/or harassment
- Ensuring that we communicate effectively to keep all children safe – see our pyramid of approach (Appendix 5)

When we move beyond language to harmful sexual behaviours, we use the continuum from the University of Bedfordshire as a guide.

<b>NORMAL</b>	<b>INAPPROPRIATE</b>	<b>PROBLEMATIC</b>	<b>ABUSIVE</b>	<b>VIOLENT</b>
Developmentally expected. Socially acceptable. Consensual, mutual, reciprocal. Shared decision-making.	Single instances of inappropriate sexual behaviour. Socially acceptable behaviour within peer group. Context for behaviour may be inappropriate. Generally consensual and reciprocal.	Problematic and concerning behaviours. Developmentally unusual and socially unexpected. No overt elements of victimization. Consent issues may be unclear. May lack reciprocity or equal power. May include levels of compulsivity.	Victimising intent or outcome. Includes misuse of power. Coercion and force to ensure victim compliance. Intrusive. Informed consent lacking or not able to be freely given by victim. May include elements of expressive violence.	Physically violent sexual abuse. Highly intrusive. Instrumental violence which is physiologically and/or sexually arousing to the perpetrator. Sadism.

All instances should be reported on MyConcern and also to the Headteacher. Decision making between the relevant members of staff within the Safeguarding Team and with the Pastoral Leads will always determine the course of action and where appropriate the consequence. Where pupils fall into the last three points on the continuum, there will always be a risk assessment and referral to HCRG Care (previously Virgin Care); in the final two points of the continuum there will usually be a fixed term exclusion and in some cases a permanent exclusion as per the procedures in our exclusion policy.

We are aware that disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not in itself prevent our school from coming to its own conclusion about what happened and imposing behaviour sanctions accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution. We will liaise with the police and/or LA children's social care to determine this

- There are circumstances that make it unreasonable for us to reach our own view about what happened while an independent investigation is ongoing.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. A referral to children's social care may be appropriate.

At all times we follow the guidance from the DfE: [Sexual Violence and sexual harassment between children in school and colleges \(September 2021\)](#)

## **7.9 Sharing nudes and semi-nudes**

If you are made aware of an incident involving consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, you must report it to the DSL immediately.

You must **not**:

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

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

### **Initial response**

In responding to an incident, the DSL will follow the guidance from the DfE: [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(December 2020\)](#)

Following a report of an incident, the DSL will hold a discussion with appropriate school staff to consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services

- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an **immediate** contact into EHASH if:

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may wish to make a referral to the weekly HSB triage meeting, consult with EHASH for advice and support or may decide to respond to the incident without involving the police or children's social care. All decision making must be recorded on MyConcern.

### **Further review by the DSL**

If threshold is not met for a strategy meeting, the DSL may utilise the Youth Justice triage service to obtain support and advice about assessing the risks, safety planning and supporting children.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, telephone consultation will take place with EHASH immediately.

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, school will initially seek telephone advice with the EHASH team and if appropriate, report the incident via 101. In high schools, it may be appropriate to refer to the school based officer.

## **Recording incidents**

All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 16 of this policy also apply to recording incidents of sharing nudes and semi-nudes.

## **Curriculum coverage**

Pupils are taught about the issues surrounding sharing nudes and semi-nudes as part of our curriculum offer. Teaching covers the following:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
  - Specific requests or pressure to provide (or forward) such images
  - The receipt of such images

This policy on sharing nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **8. Online safety and the use of mobile technology**

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 processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- 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 4 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/misandry, homophobia, biphobia, self-harm, suicide, anti-semitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child 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 address the risks above we will:**

Not permit mobile phones in school. If a mobile phone is seen, it will be confiscated until the end of the day.

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

Further advice can be found at: [Teaching Online Safety in Schools \(June 2019\)](#), and [Harmful online challenges and online hoaxes](#)

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 and share information about:

- what systems we have in place to filter and monitor online use;
- what we are asking children to do online, including the sites they will be asked to access
- who from the school (if anyone) their child is going to be interacting with online
- how to raise concerns about online safety.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, in line with the Guidance for Safe Working Practice, 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 members' personal phones will remain in their bags or cupboards during contact time with pupils and care must be taken to secure personal devices so that children are unable to access them
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Pastoral and Senior staff have work mobile phones which are used for behaviour management
- If a parent contacts a member of staff, this must be on a work phone
- If in exceptional circumstances staff need to contact a pupil using the pupil's personal number, this must be agreed by the Safeguarding Team and it must be logged on MyConcern
- All SLT are expected to keep their work phone with them outside school hours during term-time so they can be contacted in an emergency. SLT are not protected by the 1265 hours so they need to be contactable.

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 as per our Compelling Behaviour Policy and Pupil e-safety and Acceptable Use policy

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 4 key categories of risk (described above) from the school's IT systems, and regularly review their effectiveness.

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

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our Staff and Pupil e-safety and Acceptable Use policies and Social Media policy.

## **9. Notifying parents**

Where appropriate, we will discuss any safeguarding concerns about a child with the child's parents. The DSL and deputies will normally do this in the event of a concern or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL. This is so staff do not contact parents about concerns which could increase the risk to the child.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with EHASH and seek their advice before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other children involved, and when. We will work with police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL, along with any relevant agencies (this will be decided on a case-by-case basis) will:

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## **10. Pupils with special educational needs and disabilities or physical health issues**

We recognise that pupils with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils 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
- We offer extra pastoral support and attention for pupils with SEND or physical health issues. Our Additional Needs Provision operates on a continuum where pupils move between levels of the provision as their needs determine. Pupils receive support on an individual or small group basis from our Additional Needs team of SENCO, HLTAs, Teaching Assistants and Mentors. Staff develop trusted positive relationships with pupils and use a variety of methods dependent on the child to support them in communicating and sharing their experiences and views and developing their knowledge and skills.

Any concerns about abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

## **11. Pupils who are lesbian, gay, bi or trans (LGBT)**

We recognise the fact that a pupil may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. We are aware that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. We will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

## **12. Pupils with a social worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support.

We will notify the social worker on the same day if a child has been removed from class or been suspended in accordance with the updated [DFE Behaviour in Schools guidance July 2022.pdf](#) and [Suspension and Permanent Exclusion guidance July 2022.pdf](#)

School will work with the Rochdale Virtual Headteacher and their team, to reduce disadvantage and champion high aspirations for this cohort of vulnerable children.

## **13. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

- We have appointed a designated teacher, Julia Turrell (Assistant Headteacher) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. The designated teacher is currently also the Designated Safeguarding Lead.

As part of their role, the designated teacher will:

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.
- As DSL ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to, with empathy and trauma-informed approaches.

#### **14. Elective Home Education (EHE)**

Many home educated children have an overwhelmingly positive learning experience, and the decision by a parent to home educate is made with their child's best education at the heart of the decision. This is not, however, the case for all, and home education can mean some children are less visible to the services that are there to keep them safe.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the headteacher must be informed. A meeting will be arranged with parents/carers to explore what is in the best interests of the child. Support will also be sought from the EHE Co-ordinators and Fair Access Support Officers [ehe@rochdale.gov.uk](mailto:ehe@rochdale.gov.uk).

#### **15. Complaints and concerns about school safeguarding policies**

##### **15.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

##### **15.2 Other complaints**

If parents, carers or other individuals wish to raise a complaint with school, they will be directed to do so via the school complaints procedure. The school will deal with all complaints seriously. [School Complaints Procedure](#).

### **15.3 Whistleblowing**

All staff are made aware of their professional duty to raise concerns in relation to safeguarding, which may include the attitudes or actions of colleagues.

We have a whistleblowing procedure, which outlines how anyone who makes a 'protected disclosure' is protected from being treated unfairly or being dismissed. This procedure is shared with all staff in their Induction and reminders are issued on an annual basis as part of safeguarding training. [Whistleblowing Policy](#)

### **16. Record-keeping and Information Sharing**

We will hold records in line with our records retention schedule. Confidential information and records are stored securely electronically on MyConcern.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and logged on MyConcern. If you are in any doubt about whether to record something, discuss it with the DSL.

Records should include:

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

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. They will be kept for 25 years from the child's date of birth and then reviewed as to whether they need to be retained longer. In some cases, records can be kept for longer periods of time. For example, if:

- the records provide information about a child's personal history, which they might want to access at a later date
- the records have been maintained for the purposes of research
- the information in the records is relevant to legal action that has been started but not finished
- the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).
- Where there are legal proceedings, we will seek legal advice about how long to retain records.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- the first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Falinge Park High School follows “The Seven Golden Rules for Information Sharing” (HM Government Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018):

- 1) Remember that the General Data Protection Regulations, Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately;
- 2) Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
- 3) Seek advice from other practitioners or your information governance lead if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible;
- 4) Where possible share with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful reason to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared;
- 5) Consider safety and well-being: Base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions;
- 6) Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (Practitioners must always follow their organisation's policy on security for handling personal information);
- 7) Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

[Information Sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers](#)

We also follow the updated guidance in KCSIE 2022 where practitioners may share information without consent where:

- there is a good reason to do so and the sharing of information will enhance the safeguarding of a child in a timely manner
- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner gains consent
- if to gain consent would put a child at risk.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Further guidance: [NSPCC Child Protection Records Retention and Storage Guidelines](#)

## **17. Training**

### **17.1 All staff**

All staff members will undertake safeguarding and child protection training (including online safety) at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, newsletters and staff meetings) monthly, as required and at least annually.

### **17.2 The DSL and Deputies**

The DSL and Deputies are required to attend the RBSCP training titled "Working Together to Safeguard Children" once, to outline the local multi-agency safeguarding procedures in Rochdale.

In addition to this, they must attend advanced safeguarding training either via the Education Safeguarding Officer, RBSCP or another provider eg NSPCC, at least every two years.

In addition, they will update their knowledge and skills at regular intervals (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **17.3 Governors**

School ensures that all governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### **17.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

### **17.5 Staff who have contact with pupils and families**

All staff who have contact with children and families around safeguarding concerns will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### **18. Monitoring arrangements**

This policy will be reviewed **annually** by DSL Julia Turrell. At every review, it will be approved by the full governing board.

### **19. Links with other policies**

This policy links to the following policies and procedures

- Anti-Bullying policy
- Attendance policy
- Compelling Behaviour policy
- Curriculum policy
- Data and Information Protection policy
- Drugs and Illegal Substances policy
- Relationships and Sex Education policy
- School Complaints procedure
- School Lettings policy and procedure
- Single Equality and Community Cohesion policy
- Staff e-safety and Acceptable Use policy

- Pupil e-safety and Acceptable Use policy
- Social media policy
- Staff Code of Conduct - [DfE Guidance for Safer Working Practice for Adults who work with Children and Young People in Education \(May 2019\)](#)
- and also [Multi-agency guidance for safer working practice for adults who work with children and young people in the Rochdale Borough](#)
- Supporting Pupils with Medical Conditions policy
- Health and safety policy (Emergency Plans)
- Visitors policy and procedure
- Whistleblowing policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## **Appendix 1: types of abuse**

Abuse can be intra-familial or extra-familial, where children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** 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** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Consider carrying out online searches as part of our due diligence on the shortlisted candidates, which may help identify any incidents or issues that have happened and are publicly available online, which can then be explored with applicant at interview
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [Criminal Records Checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- We will obtain previous employment history via completion of an application form and check that information is not contradictory or incomplete.
- We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

## **Existing staff**

If an individual moves from a post that is not regulated activity to one that is, we will carry out all relevant checks required.

If we have concerns about an existing member of staff's suitability to work with children, we will seek advice from our HR service and/or the LADO. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in [relevant conduct](#); or

The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will not keep copies of such checks for longer than 6 months

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

## **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

## **Volunteers**

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers working in regulated activity. The DBS does not charge for checks on volunteers.

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will seek HR advice and retain a record of this risk assessment.

## **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

## **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 3: Allegations of abuse made against staff**

### **3.1 Allegations which meet the threshold for harm**

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher, other staff, a volunteer or contractor, has:

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

The policy applies regardless of whether the alleged abuse took place in the school.

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

### **Suspension until the case is resolved**

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available, obtained HR advice and concluded there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an additional adult to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location

## **Definitions for outcomes of allegation investigations**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

Immediately discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)

Inform the individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), after taking HR advice, carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. In addition to discussion with HR, advice will be also sought from the LADO, police and/or children’s social care services, as appropriate

**If suspension is considered necessary**, agree and record the rationale for this with the LADO and HR. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern and the individual will be given a named support officer at the school and their contact details

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO and HR what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

**If it is decided that further action is needed**, take steps as agreed with the LADO and HR to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Advice should be taken from HR in respect of whether referral to Occupational Health or other support services may be beneficial.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff members (where this applies) while investigations are ongoing.

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including that any disciplinary process has concluded (in confidence)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child. The HR service should support school with this requirement.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching after seeking HR advice, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the local authority will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

## **Additional considerations for supply and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO and HR to determine a suitable outcome

We will involve the agency fully as the individual's employer. School will assist the investigation by collecting any necessary information and providing it to the LADO as required

We will ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations and keep them updated about our policies as necessary and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

In all cases, we will seek to conclude any allegations management cases as soon as is practicable. If disciplinary action is required, the timescales for proceedings will be in line with school policy.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the LADO and HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and their HR representative will discuss with the LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and HR representative will discuss with the LADO whether to refer the matter to the Teaching

Regulation Agency (TRA) to consider prohibiting the individual from teaching. The TRA may then refer the case on to the Secretary of State.

### **Individuals returning to work after suspension**

If it is decided that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this and will take advice from HR in respect of reintegration into school.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be malicious, the headteacher, (or other appropriate person in the case of an allegation against the headteacher) will consider whether any disciplinary action is appropriate against the pupil(s) or the individual who made it.

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, HR team, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual, after seeking advice from HR.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will:

- not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious
- include substantiated allegations, provided that the information is factual and does not include opinions
- seek advice from HR if we are unsure about what information needs to be disclosed in a reference.

## Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the LADO and HR to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### 3.2 Allegations which do not meet the threshold for harm

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).

Examples of low-level concerns could include, but are not limited to:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child one-to-one in a secluded area or behind a closed door
- Using inappropriate sexualized, intimidating or offensive language
- Humiliating pupils.

Low-level concerns should be reported to the headteacher.

If a member of staff thinks they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards, they should self-refer.

The headteacher will record all low-level concerns, including the details of the concern, how the concern arose and the actions taken. Records will be reviewed on a regular basis so that patterns of concerning behaviour can be recognized and appropriate action taken.

## **Appendix 4: Specific safeguarding issues**

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

All staff will be vigilant, particularly in cases where it is known that a person should not be allowed to collect a pupil from school. All concerns and incidents must be logged on MyConcern, the headteacher informed and a referral made to the police and Children's Social Care.

### **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. We will seek advice from the LA Children Missing Education Team. [Rochdale CME Team](#)

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. CCE can affect both male and female children and can include children who have been moved (trafficked) for the purpose of exploitation.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or possessions (although we are aware this is not typical in Rochdale cases)
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. The DSL will seek advice

from the multi-agency Complex Safeguarding Team if they are concerned that a child is at risk of criminal exploitation.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others sharing videos or images of them on social media.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. The DSL will seek advice from the multi-agency Complex Safeguarding Team if they are concerned that a child is at risk of sexual exploitation.

### **Cybercrime**

This is criminal activity committed using computers and/or the internet. It is categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer).

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child, the DSL (or a deputy) will consider referring into the Cyber Choices programme. [Cyber Choices](#)

## **Domestic abuse**

The Domestic Abuse Act 2021 gives a statutory definition of domestic abuse and recognizes the impact on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Children can witness and be adversely affected by domestic abuse where it occurs between family members (including ex-partners) in the context of their home life. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that is not physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background.

Young people may also experience domestic abuse and/or violence in their own personal relationships, sometimes referred to as teenage relationship abuse. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Within Rochdale, our Police force uses Operation Encompass. This means that if police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This enables the DSL to consider any support that may be required according to the child's needs and to update school safeguarding records. The DSL may wish to contact the Operation Encompass helpline (telephone number 0204 523 9990) to seek advice about what support may be useful for the child and/or to check the local authority domestic abuse webpage for up to date information about local support service; [Rochdale domestic abuse information](#)

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive. School should always seek advice from EHASH if they are concerned.

### **Forced marriage**

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and contact EHASH
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fcd.gov.uk](mailto:fm@fcd.gov.uk)
- Refer the pupil to support services and provision as appropriate.

Further guidance: [The right to choose: government guidance on forced marriage](#)

## **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further guidance and how to refer victims to the NRM is available in the Modern Slavery Statutory Guidance: [Modern Slavery: how to identify and support victims.](#)

## **Preventing radicalisation**

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. The local authority Equality and Community Cohesion Officer, Muhammad Abdulaleem can assist schools in providing appropriate training.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried, irrespective of the age of the child involved.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school, both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic/ misandrist messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by

reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours, creating a culture where sexism, misogyny and misandry are not tolerated
- Utilising research and evidence-based practice to support respectful and safe school culture
- 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 will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Private fostering**

A private fostering arrangement is one that is made without the involvement of a local authority for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. The legislation governing private fostering is the 'Children (Private Arrangements for Fostering) Regulations 2005'

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools

- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families

There may also be private foster care arrangements for the following reasons;

- children brought from outside the UK with a view to adoption
- trafficked children

Current arrangements for the regulation of private fostering originate from concern following the death of Victoria Climbié in 2000. Victoria was privately fostered by her great aunt. Following this, the Children (Private Arrangement for Fostering) Regulations 2005 set out the duties of local authorities in their arrangements for private fostering, and national minimum standards for local authorities were published in 2005.

Given the 'hidden' nature of much private fostering, local authorities have a duty to raise awareness of the need to notify the local Children's Services department and schools have a vital role within this, as the people who see children and families on a day to day basis.

Further information is available at: [Children Act 1989 – Private fostering information](#)

## **Serious Violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

The range of 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.

## **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to secure their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to log into the data entry system (Inventry) and wear a visitor's badge. The visitor is photographed as part of the entry system and they are instructed to wear their ID at all times whilst on the premises.

Visitors that we do not have DBS information for are issued with a red lanyard and must be accompanied at all times.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; **or**
- The organisation sending the professional, such as the LA will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

Visitors where school holds DBS information or letters confirming DBS undertaken by company on production of photographic ID are issued with a green lanyard and do not need to be escorted.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to present any form of safeguarding risk to children, and we will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

School staff are trained that they should politely challenge any unaccompanied adults who they encounter inside the school building/ grounds, to ascertain the reason for their visit and if appropriate, accompany them.

### **Non-collection of children**

If a child is not collected at the end of the session/day, we will contact parents and carers using emergency contact numbers stored on SIMs. Every effort is made to ensure that school holds at least two emergency contact numbers for each child. If contact is made, the child will wait in school until they are collected. This will be logged on SIMS. If contact cannot be made, the pastoral team and/or safeguarding team will be alerted and a member of staff will organise other arrangements for the child to be supervised and taken home. Where there are safeguarding concerns, EHASH will be contacted for advice. Concerns and actions will be recorded on MyConcern.

## Appendix 5: Pyramid of Approach

### KEEPING ALL CHILDREN SAFE AND COMMUNICATING EFFECTIVELY

#### PYRAMID OF APPROACH

