



# **SAFEGUARDING & CHILD PROTECTION POLICY**

**The Deanery Church of England High  
School**

September 2023

Next review date:	September 2024
Author:	Designated Safeguarding Lead
Reviewed by:	Full Governors
Issue to staff:	Y/N
Website:	Y/N

## Key Contacts

Table of identified persons with specific lead responsibilities in relation to Safeguarding and other key agencies.

<b>Key Safeguarding Personnel</b>			
Role	Name	Telephone	Email
Headteacher	Mr M Wood	01942 768801	<a href="mailto:swoodm@deanery.wigan.sch.uk">swoodm@deanery.wigan.sch.uk</a>
Designated Safeguarding Lead (DSL)	Mrs L Turner	01942 597502	<a href="mailto:sturnerl@deanery.wigan.sch.uk">sturnerl@deanery.wigan.sch.uk</a>
Deputy Designated Safeguarding Leads (DDSL)	Mrs L Quirk	01942 768801	<a href="mailto:squirkl@deanery.wigan.sch.uk">squirkl@deanery.wigan.sch.uk</a>
	Mrs A Friend		<a href="mailto:sfrienda@deanery.wigan.sch.uk">sfrienda@deanery.wigan.sch.uk</a>
	Mrs J Abbey		<a href="mailto:sabbeyj@deanery.wigan.sch.uk">sabbeyj@deanery.wigan.sch.uk</a>
	Mr D Tobin		<a href="mailto:stobind@deanery.wigan.sch.uk">stobind@deanery.wigan.sch.uk</a>
	Miss E Hart		<a href="mailto:sharte@deanery.wigan.sch.uk">sharte@deanery.wigan.sch.uk</a>
Nominated Governor	Mrs E Smith	N/A	
Chair of Governors	Mr G Speakman	N/A	
Designated Teacher for Looked After Children	Mrs L Turner	01942 597502	<a href="mailto:sturnerl@deanery.wigan.sch.uk">sturnerl@deanery.wigan.sch.uk</a>
<b>The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2021)</b>			
<b>Agency Contact Details</b>			
Local Authority Designated Officer	Diane Kitcher	01942 486042	<a href="mailto:lado@wigan.gov.uk">lado@wigan.gov.uk</a>
Children's Social Care referrals	Duty Team	01942 828300	<a href="https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/ProfessionalReferralForm.aspx">https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/ProfessionalReferralForm.aspx</a>
Early Help Hub	StartWell	01942 486262	<a href="mailto:EHH@wigan.gov.uk">EHH@wigan.gov.uk</a>
Wigan Safeguarding Children's Board		01942 486025	<a href="mailto:wscb@wigan.gov.uk">wscb@wigan.gov.uk</a>
Link Social Worker	No one allocated		
CAMHS Link worker	No one allocated		
School Nursing / Health Visiting service			
SDF Huddle Manager	Matthew Jones	07795 061711	<a href="mailto:matthewjones@wigan.gov.uk">matthewjones@wigan.gov.uk</a>
Housing			
If you believe a child or young person is <b>at immediate risk</b> of significant harm or injury, contact the <b>Police on 999</b>			

This policy has been developed in accordance with the principles established by

- The Human Rights Act 1998, The Equality Act 2010 and The Public Sector Equality Duty (PSED)
- The Children Act 1989 (as amended)
- The Children and Social Work Act 2017
- The Safeguarding Vulnerable Groups Act 2006

In addition to the revised documents;

- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022

Other key documents are noted, which have prompted changes to safeguarding requirements over time. This policy references these throughout where relevant:

- GDPR and the Data Protection Act 2018
- Information Sharing: Advice for Practitioners 2018

This policy should also be read in conjunction with Wigan’s Threshold of Need Document/Procedure and Wigan’s Resolution Policy.

Safeguarding is defined as:

- ensuring that children grow up with the provision of safe and effective care
- taking action to enable all children to have the best life chances
- preventing impairment of children’s mental and physical health or development and
- protecting children from maltreatment.

The term ‘safeguarding children’ covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates pupil health and safety; school behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security. Governors will support the school to evaluate their safeguarding policy and review their practices. Consequently, this policy is consistent with all other policies adopted by the governors and should be read alongside the following policies relevant to the safety and welfare of our pupils:

Behaviour policy	Staff Behaviour policy (for safer working practice)	Teaching & Learning policy
Equality policy	Whistleblowing policy	SEND policy
Relationships & Sex Education policy	Health & Safety policy	Safer Recruitment & Selection policy
Allegations of Abuse against Adults policy	GDPR policy	Online Safety policy
Anti-bullying policy	Visitors policy	Sixth Form Behaviour Policy
Facemasks policy	Staff Code of Conduct, including safer working practices	

The aim of this policy is to ensure:

- All of our pupils/students are safe and protected from harm
- Safeguarding procedures are in place to help pupils and students to feel safe and learn to stay safe
- Adults in our school community are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection
- All agencies are providing appropriate support to children and young people through adoption of the early help framework

This will be achieved by:

- Supporting the child’s/young person’s development in ways that will foster security, confidence and independence.

- Providing a high quality, safe and stimulating environment in which children and young people feel safe, secure, valued and respected, feel confident, and are able to enjoy, learn and grow in confidence. Have positive relationships with the adults caring for them and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- Raising the awareness of all teaching and non-teaching staff of the need to safeguard children and young people, of their responsibilities in identifying and reporting possible cases of abuse (reference appendices 1 and 2) and preventing and intervening earlier to address support and social needs of young people through the early help framework
- Providing a systematic means of monitoring children/young people known or thought to be at risk of harm, and ensure we, The Deanery Church of England High School, contribute to assessments of need and support packages for those pupils/students.
- Emphasising the need for good levels of communication between all members of staff.
- Developing a structured procedure within our school which will be followed by all members of the school community in cases of suspected abuse. Also, that staff have had access to specific training and awareness raising concerning:
  - Staff Code of Conduct including safer working practices
  - D/DSL training
  - KCSiE Part 1
  - Looked After Children (LAC)
  - Online safety training for staff
  - Preventing Radicalisation
  - Whistleblowing
- Developing and promoting effective working relationships with other agencies, especially the Police, Health and Social Care.
- Ensuring that all staff working within our school who have substantial access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check 1(according to guidance) and a central record is kept for audit
- Curriculum – teaching about safeguarding: Our pupils access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life. We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. The PSHE and citizenship curriculum specifically includes the following objectives:
  - Developing pupil self-esteem and communication skills
  - Developing strategies for self-protection including online safety (this is also included within ICT modules)
  - Positive relationships and consent

## Scope

As outlined above, the term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach through the early help framework to keeping children safe that incorporates pupil health and safety; school behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security. We also recognise that incidents may happen outside of school and the child's family. Incidents can also occur between children.

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

- Physical abuse
- Emotional Abuse
- Neglect
- Sexual abuse

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's [highlight]mental and physical health[/highlight] or development;

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1 Guidance regarding DBS checks was updated by the Protection of Freedoms Act 2012 <https://www.gov.uk/db-check-applicant-criminal-record>

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

The definitions of which can be found in the glossary, and signs and symptoms of the four categories of abuse can be found in *Appendix one and two*.

This policy assumes that any of the categories of abuse could be disclosed within the Borough of Wigan, and gives further information relating to individual types of abuse within this document in line with advice and guidance within Keeping Children Safe in Education 2022.

### **Expectations**

All staff are:

- Familiar with this safeguarding policy and have an opportunity to contribute to its review.
- Alert to signs and indicators of possible abuse.
- Able to record and report concerns as set out in this policy.
- Able to deal with a report of abuse from a pupil.
- Involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 of the latest version of Keeping Children Safe in Education (KCSIE 2022). The governors have made the decision that all staff who work at The Deanery will read part 1 and Annex A. All staff who work directly with children have received a briefing on KCSIE 2022 and signed to declare they have received, read and understood Part 1 and Annex A.

We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils and students from harm, and that the young person's welfare is our paramount concern.

All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child or young person.

We recognise that a child / young person who is neglected, abused or who has witnessed violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of worth.

We recognise that the school may provide the only stability in the lives of children and young people who have been abused or are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We recognise that the early help framework provides opportunities to intervene early and prevent safeguarding issues developing, as well providing a framework for appropriate support to be wrapped around the child / young person and their family.

### **Responding to concerns/reports of abuse**

Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a report of abuse.

#### **Do:**

- Create a safe environment by offering the child a private and safe place if possible.
- Stay calm and reassure the child and stress that he/she is not to blame.
- Tell the child that you know how difficult it must have been to confide in you.
- Listen carefully and tell the child what you are going to do next.
- Use the 'tell me', 'explain', 'describe' and/or mirroring strategy.
- Tell only the Designated or Deputy Safeguarding Lead. Do not disclose information to anyone else unless told to do so by the Headteacher or DSL.
- 'Record in detail using CPOMS without delay, using the child's own words where possible. Immediately seek the DSL or DDSL to ensure the alert has been recognised and acted upon

**Do not:**

- Take photographs of any injuries.
- Postpone or delay the opportunity for the pupil to talk.
- Take notes while the pupil is speaking or ask the pupil to write an account.
- Try to investigate the allegation yourself.
- Promise confidentiality, e.g. say you will keep 'the secret'.
- Approach or inform the alleged abuser.

All staff record any concern about or report by a pupil of abuse or neglect and report this to the D/DSL using CPOMS. It is the responsibility of each adult in school to ensure that the D/DSL receives the record of concern without delay. In the absence of the D/DSL, staff will seek advice direct from a member of the pastoral staff who will contact Children's Social Care.

In some circumstances, the D/DSL or member of staff seeks advice by ringing Children's Social Care. During term time, the DSL and / or a DDSL is always available during school hours for staff to discuss any safeguarding concerns.

The voice of the child is central to our safeguarding practice and pupils are encouraged to express and have their views given due weight in all matters affecting them.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a pupil is being privately fostered, we remind the carer/parent of their legal duty to notify Wigan Children's Social Care. We follow this up by contacting Children's Social Care directly.

**Safe Setting, Safe Staff**

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children and young people both physically within the school environment and, for example, in relation to internet use, and when away from the school, undertaking off site trips and visits.

School security guidance has been compiled to support the senior management of educational settings in the discharge of their responsibilities by ensuring the development and implementation of suitable procedures. In particular, maintaining the security of the premises in response to potential threats to the staff and pupils / students of the setting.

The Deanery Church of England High School will ensure that:

1. The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering /at risk of suffering abuse and neglect.

As key strategic decision makers and vision setters for the school, the governors will make sure that our policies and procedures are in line with national and local safeguarding requirements. Governors will work with the senior leaders to make sure the key actions set out in Safe Setting Safe Staff are in place.

- There is a safeguarding, child protection and early help policy together with a staff code of conduct
- The school operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training.<sup>2</sup>
- The school has procedures for dealing with allegations of abuse against staff volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned.

- A senior leader has Designated Safeguarding Lead (DSL) responsibility
  - On appointment, the DSL undertakes interagency training and also undertakes DSL “new to role” training and an “update” course every year
  - All other staff have access to safeguarding training. Staff are obliged to complete this training and the record of this is logged. Staff complete this training every 2 years.
  - Any weaknesses in Child Protection processes and procedures are remedied immediately
  - The Chair of Governors is nominated to liaise with the LA in the event of an allegation of abuse made against the Head teacher.
  - Safeguarding and Child Protection policies and procedures are reviewed annually and that the Safeguarding, Child Protection and Early Help (Thresholds of Needs) policy is available on the schools website or by other means
  - The Governing body consider how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and / or for maintained schools through relationship and sex education (RSE).
  - Other specific topics will include:
    - Developing pupil self-esteem and communication skills
    - Developing strategies for self-protection including online safety (this is also included within ICT modules)
    - Positive relationships and consent
  - That enhanced DBS checks are in place for the Chair of Governors
  - The nominated governor (NG) for safeguarding liaises with the Head teacher and the D/DSL to complete an annual Section 175 safeguarding audit to return to the local authority.
  - Keeping Children Safe in Education is statutory guidance that schools in England must have regard to when carrying out their duties to safeguard and promote the welfare of children applying to governing bodies of maintained schools and colleges;
2. The lead DSL is a member of the Senior Leadership team who has; along with the deputy designated safeguarding lead(s), undertaken the relevant training, and, upon appointment will undertake DSL new to role training followed by annual updates.
  3. The DSL’s who are involved in recruitment and at least one member of the governing body will also complete safer recruitment training to be renewed every 3 years
  4. The name of the designated members of staff for child protection (DSL’s and DDSL’s) will be clearly visible in the school and on the school website.

DSL: Leanne Turner (Deputy Headteacher)  
 DDSL: Anthea Friend (Deputy Headteacher)  
 DDSL: Dominic Tobin (Assistant Headteacher)  
 DDSL: Lesley Quirk (Associate Assistant Headteacher)  
 DDSL: Jo Abbey (Associate Assistant Headteacher)  
 DDSL: Emma Hart (Associate Assistant Headteacher)

5. All members of staff are trained in, and receive, regular updates in online safety and reporting concerns
6. All new members of staff will be given a copy of our safeguarding statement and safeguarding, child protection and early help (thresholds of need) policy, with the DSL’s names clearly displayed, as part of their induction.
7. All other staff, volunteers and governors, have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
8. Child protection and safeguarding concerns or allegations against adults working in the school are referred to the LADO 3 for advice and that any member of staff found not suitable to work with

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3 LADO Local Authority Designated Officer for allegations against staff. LADO threshold document can be found here <https://www.wigan.gov.uk/Docs/PDF/WSCB/LADO-threshold.pdf>

children or young people will be notified to the Report and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer or contractor.

9. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the schools Safeguarding, Child protection and Early Help policy, and reference to it in the school or setting's Parent's Handbook
10. The Policy is available publicly either on our website. Parents/carers are made aware of this policy and their entitlement to have a copy of it.
11. All visitors sign in and out using the school's electronic visitor system, wear a school ID badge and are provided with safeguarding information including the contact details of safeguarding personnel.
12. We will provide a safe space for pupils who are LGBT to speak out and share their concerns
13. Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the school. Supporting letter in relation to DBS checks of visitors holding professional ID badges can be found in (Appendix 3)
14. Community users organising activities for children are aware of the school's child protection guidelines and procedures.
15. Our Lettings policy, for community use of the premises, will seek to ensure the suitability of adults working with children on school sites at any time. Also, we will adhere to the DfE guidance on how schools should best handle allegations made against an outside organisation or individual. These might be allegations from community groups, sports associations or other service providers running extracurricular activities. *Guidance: Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings Updated 4 April 2022.* This guidance serves as a reminder to follow our own safeguarding policies and procedures and to inform the local authority designated officer (LADO) if a safeguarding allegation is made by your school against an external individual or organisation.
16. Our procedures will be annually (as a minimum) reviewed and updated.

## **Responsibilities**

### **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, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a 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
- 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.
- All governors will read Keeping Children Safe in Education in its entirety.
- 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
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional 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).
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any 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.

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

### **The Headteacher**

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

Work with the DSL to ensure that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction. As outlined in KCSIE 2023, as part of all staff training and new staff induction, colleagues will be briefed on our expectations and their roles and responsibilities around our online filtering and monitoring systems.
- 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/carers when their child joins the school and via the school website

The Headteacher will also:

- Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Work with the DSL to ensure that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly, including online filtering and monitoring systems
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 8)
- Make decisions regarding all low-level concerns, though he will collaborate with the DSL on this (KCSiE 2022)

### **Virtual School Head**

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.

### **Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead (DSL) should take lead responsibility for safeguarding and child protection and is responsible for:

1. Referring a child if there are any concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss these concerns. Referrals should be made by calling the Children's duty team.

2. Keeping written records of concerns about a child even if there is no need to make an immediate referral; these written records are captured and securely saved in CPOMS with the original papers destroyed through confidential waste.
3. Ensuring that all such records are kept confidentially, securely stored and are separate from pupil / students record, are transferred securely and held by the setting where the pupils / students attend until their 25<sup>th</sup> birthday. In the instance of an early help intervention, consideration will be given to the welfare of the child / young person and consult with the family for appropriate transfer of information.
4. Ensuring that an indication of the existence of the additional file outlined above is clearly marked on the pupil's records.
5. Ensuring that all records are kept and retained in line with the "Record retention" policy, Children looked after records are retained for 99 years, and a record is kept and witnessed of the disposal of individual's record. We will continue to monitor the advice and guidance outlined in the NSPCC Child Records Retention Protection and Storage Guide: <https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-april-2019.pdf>
6. Making sure when a pupil / student leaves, any information regarding safeguarding (current or historic) as well as the child protection file, where applicable, is transferred to the new school within 5 days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
7. Ensuring that they, or the staff member attending case conferences, core groups, early help meetings or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared with the parents.
8. Ensuring that any pupil or student currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
9. Organising child protection induction and update training every 2 years for all school staff.
10. Have a good understanding of harmful sexual behaviour
11. Will discuss the local response to sexual violence and sexual harassment with the policy and local authority children's social care colleagues to prepare the school's policies
12. Will know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
13. Providing, with the Headteacher, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and a number of children on the child protection register (anonymised)
14. Liaising with other agencies and professionals

In line with KCSIE 2022, the DSL will also help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

#### **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 sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, online safety policy and the 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 problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- 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 radicalisation, serious violence including that linked to county lines
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children are at risk of harm inside and outside their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- Contextual safeguarding and safeguarding updates, via regular training and awareness sessions during staff briefings and staff meetings

## **Record-keeping**

- We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing.
- Records will 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
- Concerns and referrals will be kept in a separate child protection file for each child, on cpoms.
- Any non-confidential records will be readily 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.
- Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
- 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. 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.
- All safeguarding information is held electronically on cpoms. The DSL/DDSL, The Headteacher and key pastoral staff will use two factor authentication to access highly confidential files.
- Where possible files are transferred to new settings using cpoms secure transfer. If the setting does not use cpoms, files are transferred via recorded delivery and a receipt is expected.

## **Supporting Children and Young People**

The school will consider the need for an Early Help assessment when it is identified that there are low level concerns or emerging needs. Detailed information on Early Help can be found in Chapter 1 of Working Together to Safeguard Children.

It is the responsibility of the school to initiate Early Help to identify what the family's strengths and needs are. This will inform whether the setting can support the family or whether a referral to another agency is needed. This process provides a way of recording support and interventions that have been provided by the school to the child / young person and also supports a referral for additional support that may be needed from more

targeted services where a single agency has been unable to meet that need. A team around the child meeting (TAC) can be arranged to ensure that a multi-agency action plan can be developed. It is important that the child and parents voice is captured as part of this assessment and that they take ownership of the plan. This plan should be regularly reviewed up to 4 to 6 weeks until outcomes are achieved.

If at any point during the EH process, the risk increases and the school becomes concerned that the child or young person is, or is likely to suffer significant harm, then a referral will be made to children's social care.

Our criteria for referral to local authority children's services is where we have become concerned by:

- a child who is disabled or whose health or development is impaired or is likely to be further impaired without the provision of services (Children in Need)
- where we have reasonable cause to suspect that a child is suffering or likely to suffer significant harm (S47 Children Act 1989).
- Anyone can make a referral. Staff will be supported and guided by the DSL team

The school is working inline with the Wigan Multi Agency Safeguarding Arrangements (MASA) and the Safeguarding Partnership, and is guided by their direction and advice regarding referrals.

<http://www.wiganlscb.com/Docs/PDF/Professional/MASA-Document-June-2019.pdf>

In all cases the school will consider the statutory guidance for schools and colleges, Keeping Children Safe in Education, published by the DfE September 2018 and updated September 2019, with particular reference to Part 1: Information for all schools and colleges.

Our school will support all children and young people by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as our relationships, whilst not condoning aggression or bullying.
- Healthy relationships
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a child or young person, about whom there have been concerns, who leaves the school by ensuring that appropriate information is copied under confidential cover to the pupils new setting and ensuring the school medical records are forwarded as a matter of priority.

If at any point the school becomes concerned that a child or young person is at serious risk of harm they should respond appropriately. If the school is concerned that a child is at **immediate** or **imminent** risk then they should contact Greater Manchester Police on either 111 or 999. If however the school is concerned that a child is, or is likely to suffer serious harm but it is not imminent they should call Wigan Children's Social Care Referral Team on 01942 828300.

This policy recognises the guidance in KCSIE 2022 which offers the NSPCC guidance "When to call the police" This guidance is a working guide for staff in schools and other settings which we highly recommend as a working document:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

The school will make a referral to the to the police in cases where a crime may have been committed.

The DSL will ensure that children will have an appropriate adult to support and help them in the case of a police investigation or search. (KCSIE 2022)

### **Children with Special Education Needs and Disabilities (SEND)**

The school will use the same considerations for children and young people with SEND and health conditions, as detailed above. It is important to note that pupils with SEND are 3 times more likely to be abused than their peers. Additionally, the school recognises and abides by the KCSIE 2022 guidance which states that we should understand the unique risks associated with online safety and have the relevant knowledge and up-to-date capability required to keep [SEND] children safe whilst they are online at school. We also recognise that is essential to avoid making the assumption that possible signs and indicators of abuse and neglect are attributable to the child's disability. We must also take into consideration that additional barriers can exist when recognising abuse and neglect in this group of children and young people. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's SEN or disability without further exploration (the setting must consider the child first and foremost, rather than the child's SEND);
- A higher risk of vulnerability due to factors such as; a learning disability, lack of awareness, social isolation, which may contribute to risks such as online vulnerability;
- Being more prone to Peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Children and young people with SEN and disabilities can face a number of challenges to report, which must be recognised and taken into account, including; prejudice, negative responses and low expectations. Abuse involving pupils with SEND will require close liaison with the DSL and the SENCo.

### **Safeguarding Children Who Are Especially Vulnerable**

We recognise that other groups of children and young people may be especially vulnerable and need additional measures to keep them safe and to promote their welfare. Examples of this may be children who have medical needs, pupils who identify or are living in families that are LGTPQ, pupils who are Looked After/ Previously Looked After/ Privately Fostered/ SGOs, children that are Young Carers, children that have a social worker and Startwell worker, for any reason. This list is a starting point but by no means exhaustive. This cohort has been identified as a group of children who face significant barriers to education as a result of experiences of adversity, most commonly abuse and neglect. Pupils who are especially vulnerable will be known by school and work will be done by the pastoral teams to:

- Offer effective signposting
- Champion the pupil's thoughts/ feelings/ perspectives with parents and carers and support workers
- Make timely referrals for support
- Access financial support to bring about the best educational outcomes where this is available
- Support with engagement and attendance in school
- Make internal referrals where necessary for academic, therapeutic and pastoral interventions
- Where appropriate, work closely with the Virtual School Head, inline with the guidance found in: "Promoting the education of children with a social worker. Virtual School Head role extension June 2022"
- Stay safe both online and offline (KCSIE 2023)

### **Information Sharing & Confidentiality**

We recognise that all matters relating to child protection are confidential<sup>4</sup> and information is handled in line with the schools Privacy Notice for Pupils & Parents.

The Government has issued Information Sharing for Safeguarding Practitioners Guidance that included 7 'Golden Rules' of Information Sharing in safeguarding :

The Government guidance (described by the NSPCC, 2018) is:

1. Remember that the General Data Protection Regulation (GDPR) Data Protection Act 2018 and human rights law 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 if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

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<sup>4</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safe\\_guarding\\_services.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safe_guarding_services.pdf)

6. Necessary, proportionate, relevant, adequate, 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 individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
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
8. DSL to share child protection files with the nominated next educational establishment for all pupils.

We keep to strict confidentiality rules as per GDPR guidelines. We recognised however, that with regards to safeguarding, our responsibility is to at all costs, keep children safe. This includes:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and we will use this document to support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff (see appendix 8)

All staff must be aware that they have a professional responsibility to share information in order to safeguard children and cannot assume that someone else will pass on the information.

Sharing of information will be necessary for the purpose for which it's being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely

Key organisations who have a duty under section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

- The Local Authority
- NHS England
- Clinical commissioning groups
- NHS Trusts, NHS Foundation Trusts
- The local policing body
- British Transport Police Authority
- Prisons
- National Probation Service and Community Rehabilitation Companies
- Youth offending teams
- Bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008

We will always undertake to share our intention to refer a child or young person to Social Care with their parents/carers unless to do so could put the child or young person at greater risk of harm, or impede a criminal investigation.

As data controllers who process personal information we are registered with the Information Commissioner's Office

The school employs a counsellor who can offer confidential advice and support to children and young people. Parents are informed that unless the child (or another person) is at significant and immediate risk, all information shared with the counsellor is confidential. This arrangement is outside our usual information sharing practice but in line with counselling practice. This is always conducted with the permission of parents who sign to agree they accept this arrangement as different from usual school procedures.

### **Supporting staff**

The Deanery Church of England High School will work with partners in the safeguarding partnership to ensure positive outcomes for children and young people.

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

We will organise systems for informal and formal supervision for those staff engaged in and affected by their care of vulnerable children.

Designated Safeguarding Leads should make use of support available by the Local Authority and the partnerships Safeguarding Team.

DSLs will have oversight of Early Help and Child Protection plans with appropriate structure in place to monitor progress and outcomes in partnership with Children's Social Care and other stakeholders (check levels)

We will share information such as Early Help, CIN and CP arrangements with limited external services only and limit this information to only that which is relevant. Specifically, the organisations we commission to support us in our work that will be notified of such information is TESS, LA admissions and inclusion team, LA SEND team and our counselling service.

## Training

### All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

### Recognising Abuse and Taking Action – All Staff:

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)”.

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Set out your local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

You might also include the following link to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

#### *If a child makes a report 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
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, 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

Bear in mind that some children may:

- Not feel ready, or know how 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 a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

#### *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)*

Where 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 pastoral team/ senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.



## [Professional referrals - for children \(wigan.gov.uk\)](http://wigan.gov.uk)

Share details of any actions you take with the DSL as soon as practically possible.  
Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

### Early help assessment

If an early help assessment is appropriate, the DDSL (with our pastoral teams) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care 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/ Pastoral teams 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.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. 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, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### Training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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. The training schedule and renewal arrangements are monitored carefully.

Staff will also receive regular safeguarding and child protection updates, including on online safety, via staff briefings and through emails, staff bulletins and staff meetings.

### ***Contractors who are provided through a private finance initiative or similar contract will also receive safeguarding training.***

Volunteers will receive appropriate training.

### **The DSL DDSL**

The DSL and Deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through LA meetings, team meetings or taking time to read and digest safeguarding developments. They will also undertake Prevent awareness training.

### **Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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.

## **Recruitment and selection process - see appendix 8**

### **Disagreements, Escalation and Resolution**

Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act / not act in response to a concern raised about a child is wrong. In such cases the WSCB Case Resolution Protocol (formerly escalation policy) is used if necessary.<sup>5</sup> If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

### **Whistleblowing**

All staff can raise concerns about poor or unsafe practice and potential failures in the schools safeguarding regime. Our whistleblowing procedures, which are reflected in staff training and our Code of Conduct, are in place for such concerns to be raised with the DSL or the Head teacher.

If a staff member feels unable to raise an issue with the DSL or Headteacher, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Public Concern at Work [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk) Tel: 020 7404 6609
- Ofsted whistleblowing@ofsted.gov.uk Tel: 0300 123 3155
- The Nominated Governor for Safeguarding: Mrs E Smith

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fails to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitudes or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer / LADO following the whistleblowing policy.

As part of ongoing vigilance, staff should feel comfortable discussing safeguarding matters that happen in and outside of work –this includes safeguarding matters which happen online.

Whistleblowing regarding the Headteacher should be made to the Chair of Governors via the Clerk to the Governors: [swogant@deanery.wigan.sch.uk](mailto:swogant@deanery.wigan.sch.uk) or using extension 1234

It's acknowledged that Whistleblowers have the right to remain anonymous, however identifying yourself may assist with any further investigations.

### **Physical intervention and use of reasonable force**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child or young person is endangering him/herself or others.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children/young people. "Reasonable" in these circumstances means using no more force than necessary and staff should refer to the section on "use of reasonable force" within the behaviour policy.

Such events should be recorded by completing a serious incident log and signed by a witness; via our Team Teach log.

Staff who are likely to need to use physical intervention or reasonable force will be appropriately trained in Team Teach.

We understand that physical intervention of a nature which causes injury or distress to a child or young person may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children and young people, and all staff are aware of the safer working practice guidance<sup>6</sup> to ensure they are clear about their professional boundary.

The relevant guidance can be accessed here:

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444051/Use\\_of\\_reasonable\\_force\\_advice\\_Reviewed\\_July\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf)
- <https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools>
- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- <https://www.saferrecruitmentconsortium.org/GSWP%20May%202019%20final.pdf>

## **Prevention**

We recognise that the school plays a significant part in the prevention of harm to our children and young people by providing them with good lines of communication with trusted adults.

If early help is appropriate, the designated safeguarding lead, deputy or a designated member of pastoral staff will contact the early help hub to ensure there is no current intervention and will generally lead on liaising with other agencies, setting up an inter-agency assessment as appropriate.

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

The school will:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children and young people e.g. through safety questionnaires & participation in anti-bullying week
- Ensure that all pupils and students know there is a trusted adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, opportunities to equip children with the skills they need to stay safe from harm and to know whom they should turn to for help. In particular, this will include anti-bullying work, e-safety, road safety, pedestrian and cycle training.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## **Domestic Abuse**

We recognise the significant impact domestic abuse can have on children and young people, therefore we operate in partnership with Operation Encompass, a system which facilitates the sharing of information relating to domestic incidents where children live or frequent. Any incidents of domestic violence reported to the police will be notified to the school to effectively support the child(ren) / young person. This information comes to the school via an Operation Encompass report which is supported by a follow-up phone call for additional detail. This is logged on CPOMS.

## **Sexual violence and sexual harassment, including child-on-child Child-on-Child Abuse and Sexual Violence**

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<sup>6</sup> Available to view on the WSCB website

The Deanery Church of England High School and Sixth Form College recognises that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Child-on-Child abuse will not be tolerated or passed off as part of "banter" or "growing up". We are committed to a whole school approach to ensure the prevention, early identification and appropriate management of Child-on-Child abuse within our school and beyond.

In cases where Child-on-Child abuse is identified we will follow our protocols set out in this document, taking a contextual approach to support all children and young people who have been affected by the situation.

We recognise that Child-on-Child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation
- Sexting or youth produced digital imagery
- Upskirting
- Bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour

Some of these behaviours will need to be handled with reference to other policies in school such as the anti-bullying policy, behaviour policy and online safety policy. This is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2022) and should be read in conjunction with the Local Safeguarding Children Board's (LSCB) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

We acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents or adults in the community.

### **Understanding Child-on-Child abuse:**

Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing. Sexual harassment and sexual violence may also occur online and offline.

### **Child-on-Child abuse behaviour:**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB). We are adopting the NSPCC definition of HSB as: -

"Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult." We will also use Simon Hackett's continuum model to demonstrate the range of sexual behaviours. (Appendix F of our ***Behaviour Policy***)

### ***Vulnerable groups***

We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable. This can include: experience of abuse within their family; living with domestic violence; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010. Whilst research tells us girls are more frequently identified as being abused by their peers and, girls are more likely to experience unwanted sexual touching in schools this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience Child-on-Child abuse, but they do so in gendered ways.

### ***Indicators***

These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### ***Responding to Alleged Incidents / Responding to reports of sexual violence and sexual harassment***

All reports of Child-on-Child abuse will be made on a case by case basis with the designated safeguarding lead or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

The immediate response to a report

- We will take all reports seriously and will reassure the victim that they will be supported and kept safe.
- All staff will be trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead or social care) staff will however only share the report with those people who are necessary to progress it.
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element the school will follow advice on searching, screening and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. For all searches, another appropriate adult will be present with the child.
- The DSL will be informed as soon as possible.

### ***Risk Assessment***

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and

- All the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them; Risk assessments will be recorded (written or electronic say where these are filed) and be kept under review.

The designated safeguarding lead (or a deputy) will ensure they are engaging with MASH.

### ***Action following a report of sexual violence and/or sexual harassment***

Following an incident, we will consider

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school staff; and other related issues and wider context?

### ***Follow up Actions***

Children sharing a classroom:

Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim.
- We will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from the school.

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

### ***Options to manage the report***

#### *Manage internally*

1. In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support (you may wish to give details here).

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored (by the DSL/ DDSL or pastoral team on CPOMS).

2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH following locally agreed protocols. Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

#### *Reporting to the Police*

Any report to the police will generally be made through the MASH as above. The designated safeguarding lead (and their deputies) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim

and their anonymity. Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school take do not jeopardise the police investigation.

#### *The end of the criminal process*

If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following our behaviour policy. If the perpetrator remains in school we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable. Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. We will ensure all children involved are protected, especially from any bullying or harassment (including online). Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using this behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Advice will be sought from key partner agencies around issues such as information sharing and respecting the wishes of the victim, where possible.

#### **Physical Abuse**

While a clear focus of Child-on-Child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond under this behaviour policy. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

#### **Online Behaviour**

Many forms of Child-on-Child abuse have an element of online behaviour including behaviours such as cyberbullying and sexting. Policies and procedures concerning this type of behaviour can be found (in anti-bullying policy and our online safety policy)

### **Prevention & Creating a supportive environment in school and minimising the risk of child-on-child abuse**

The Deanery Church of England High School and Sixth Form College, actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- Educating all Governors, Senior Leadership Team, staff and volunteers, pupils and students, and parents about this issue. This will include training all Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. This includes
  - (a) Contextual Safeguarding;
  - (b) The identification and classification of specific behaviours; and
  - (c) The importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing.
- Educating children about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum.
- Pupils/Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of peer-on-peer abuse.
- Ensuring that all peer-on-peer abuse issues are fed back to the school's safeguarding team so that they can spot and address any concerning trends and identify pupils/students who maybe in need of additional support.
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- Working with Governors, Senior Leadership Team, all staff and volunteers, pupils/students and parents to address equality issues, to promote our school values, and to encourage a culture of faith, hope, love, wisdom, courage and integrity amongst all members of the school community;
- Creating conditions in which our pupils/students can aspire to and realise safe and healthy relationships;
- Creating a culture in which our [pupils/students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
- Responding to cases of peer-on-peer abuse promptly and appropriately.

### **How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports:**

- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

### **Sharing of nudes and semi-nudes (‘sexting’) Our responsibilities when responding to an incident**

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated and may be considered to be “experimental sexting” the identified motives of which are: romantic, sexual attention



seeking or "other" reasons which cover natural curiosity or misplaced humour. See Appendix 9 for clarification regarding the process of sexting/ nudes/ semi-nudes.

**This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.**

What to do if an incident comes to your attention:

- Report it to the Designated Safeguarding Lead (DSL) or Deputy.
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).
- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), staff must report it to the DSL immediately.

The DSL/ DDSL will talk to the young person following all reports of nudes/ semi-nudes and make appropriate arrangements so that the young person is protected and supported. Relevant referrals will be made based on the nature of the report, to the police/ CSE. Parents will be involved in all discussions and referrals in all but exceptional circumstances.

We have a zero tolerance to sexual violence and sexual harassment at The Deanery Church of England School; failure to challenge risks creates an environment where inappropriate behaviours become normalised therefore we will always challenge such behaviour.

#### **Initial review meeting**

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

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

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

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

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through our school placed engagement police officer or ringing 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE (RSE) programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- 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 and when it may be deemed as online sexual harassment
- 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 the sharing of 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.

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with managing other safeguarding risks, schools should be alert to changing in children's and young person's behaviour that could indicate that they are in need of protection. Staff should use their professional judgement in identifying children and young people who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Our school safeguarding policy will therefore comply with the schools duty under Section 26 of the Counter Terrorism and Security Act 2015 in accordance with the Department of Education advice for schools specific guidance for schools:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

Our school safeguarding policy will be aligned with and reflect the processes described in the Wigan's Prevent Policy and Procedure (link to be added to refreshed policy)

## **Exploitation – CSE, Criminal, Human Trafficking, Modern Day Slavery, County Lines**

Our school will ensure that the Designated Safeguarding Lead and other key staff are trained in spotting the possible signs of exploitation outlined in Appendix one and two (this is not an exhaustive or definitive list)

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## **Female Genital Mutilation**

The Female Genital Mutilation Act 2003 was amended by the Serious Crime Act 2015 where the law was extended to:

- A non-UK national who is 'habitually resident' in the UK and commits such an offence abroad can now face a maximum penalty of 14 years imprisonment. It is also an offence to assist a non-UK resident to carry out FGM overseas on a girl who is habitually, rather than permanently, resident in the UK. This follows a number of cases where Victims were unable to get justice as FGM was committed by those not permanently residing in the UK.
- A new offence is created of failing to protect a girl from the risk of FGM. Anyone convicted can face imprisonment for up to seven years and / or and unlimited fine.
- Anonymity for the Victims of FGM. Anyone identifying a Victim can be subject to an unlimited fine.
- School staff must report to the police any reports of FGM on a girl under 18 years of age.

The school recognises and adheres to its mandatory duty to report any suspected or known cases of FGM about a female under 18 years old to the police.

Our Designated Safeguarding Lead will maintain up to date knowledge of the Greater Manchester Safeguarding Partnership Protocol to Female Genital Mutilation. We will use guidance issued here:

<http://nationalfgmcentre.org.uk/wp-content/uploads/2019/06/FGM-Schools-Guidance-National-FGM-Centre.pdf>

## **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. We recognise our responsibility as a school, in reinforcing the importance of online safety when communicating with both pupils and parents.

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, ie: 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, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology

- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- 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. Online monitoring and filtering software will be audited annually.

This section summarises our approach to online safety and mobile phone use. ***Also refer to our online safety policy and mobile phone policy, which you can find on our website***

KCSIE 2022 emphasises that it is essential that we adopt a whole school approach to online safety. We are committed to whole school online safety training which is regularly updated, including governors - who should ensure online safety is an interrelated theme in devising and developing a whole school approach to safeguarding. We regularly audit how effectively our filters for online safety are in school and review our processes to ensure we can efficiently report and block materials without risk to pupils.

KCSIE 2023 clearly states that the DSL must be responsible for understanding the filtering and monitoring systems and process in place across the school. It is the responsibility of the Governors to review the DfE's Filtering and Monitoring standards and liaise directly or appoint the Headteacher/ DSL to liaise on their behalf, with our IT staff and service provider how best to support our school in meeting those standards. See Appendix 9

At the Deanery we use Sophos antivirus, Sophos firewall and Netsupport for monitoring and filtering. All searches that breach these tools are sent as an alert to Heads of Year (for pupils) and to the Head's PA (for staff). Concerns for pupils are then triaged and flagged on CPOMS. Concerns for staff are triaged and flagged to the DSL/ Headteacher by the Head's PA.

KCSIE 2022 states that Cybercrime is criminal activity committed using computers and/or the internet and includes:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.

This section should be read alongside our internal Online Safety policy (for governors and staff) which outlines our responsibility to appropriately filter and monitor technology on school devices and the school network.

### **Children Missing Education**

Responsibilities for Children Missing from Education (CME):

We recognise that Children missing from education and children whose parents/ carers have expressed an intention to educate them at home, are at greater risk.

- Schools must enter pupils on the admission register at the beginning of the first day on which the setting has agreed, or been notified, that the pupil will attend. If a pupil fails to attend on the agreed or notified date, the school should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity
- Schools must monitor pupils' attendance through their daily register. Settings should agree with their local authority the intervals at which they will inform local authorities of the details of pupils who fail to attend regularly, or have missed ten school days or more without permission. Schools should monitor attendance closely and address poor or irregular attendance.
- Schools must also arrange full-time education for excluded pupils from the sixth school day of a fixed period exclusion. This information can be found in the *Exclusion from maintained schools, academies and pupil referral units in England* statutory guidance.
- Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Further information about schools' safeguarding responsibilities can be found in the Keeping Children Safe in Education.

Making reasonable enquiries for Children Missing Education;

- The term 'reasonable enquiries' grants schools and local authorities a degree of flexibility in decision-making, particularly as the steps that need to be taken in a given case will vary. The term 'reasonable' also makes clear that there is a limit to what the school and local authority is expected to do.
- In line with the duty under section 10 of the Children Act 2004, the expectation is that the school and the local authority will have in place procedures designed to carry out reasonable enquiries. The type of procedures may include the appropriate person checking with relatives, neighbours, landlords – private or social housing providers – and other local stakeholders who are involved. They should also record that they have completed these procedures. If there is reason to believe a child is in immediate danger or at risk of harm, a referral should be made to children's social care (and the police if appropriate).

Staff report immediately to the D/DSL, if they know of any child who may be:

- Missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)
- Missing education – (compulsory school age (5-16) with no school place and not electively home educated)

The Local Authority requires Schools to complete the '**Children Missing Education**' referral form. **(Appendix 5)** This form should be completed once the setting has completed reasonable enquires, but failed to locate the child following 10 days of absence. The first part should be completed by school and submitted to the Early Help Hub [EHH@wigan.gcsx.gov.uk](mailto:EHH@wigan.gcsx.gov.uk) . The EHH will then complete further checks to ensure all lines of enquiry have been exhausted, before it is agreed the child is removed from roll. If the parent/carer of a child with an education, health and care (EHC) plan has expressed their intention to educate their child at home, local authorities will need to review the plan and work closely with parents/carers (KCSIE 2023). Likewise, if the parent of any other vulnerable pupil child has expressed their intention to educate their child at home, we would alert the relevant authority (social worker, VST, startwell worker etc) and work closely with our Elective Home Education co-ordinator to ensure all concerns were co-ordinated and a robust plan to support was in place.

Making these enquiries may not always lead to establishing the location of the child, but will provide a steer on what action should be taken next, for example, to contact the police, children's social care and, in cases where there may be concerns for the safety of a child who has travelled abroad, the Foreign and Commonwealth Office.

Where a pupil has not returned to school for ten days after an authorised absence, or is absent from school without authorisation for twenty consecutive school days they can only be removed from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the pupil's whereabouts after jointly making reasonable enquiries. Local authorities and schools should agree roles and responsibilities locally in relation to making joint enquiries. This only applies if the setting does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

The designated teacher for LAC and care leavers to discuss any unauthorised / unexplained absence of a Looked After Children with the Virtual School Team, when required.

Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised / unexplained absence, and after reasonable attempts have been made to contact the family, the DSL follows the WSCB procedure and refers to Children's Services as appropriate. We recognise the difference in terminology between 'children missing education' and 'children absent from education'. Children being absent from education for prolonged periods and/or on repeat, acts as a warning sign to a range of safeguarding issues. We work closely with pupils who are persistently absent and children missing education as each pupil is at risk of abuse. We also recognise the importance of working closely with persistently absent pupils (also referred to as children being absent from education) as this helps prevent the risks of them becoming a child missing education in future (KCSIE 2023)

Where there are no known welfare concerns about a pupil, follow procedures for recording school absence in line with *DfE School attendance; Guidance for maintained schools, academies, independent schools & local authorities -September 2018*. Should a pupil's attendance become a cause for concern it is advisable to intervene early to prevent entrenched non-school attendance. School should make contact with the Early Help Hub (EHH) to initiate an Early Help, if appropriate. This will evidence and identify the barriers impacting on the pupil's engagement with school.

### **Young Carers**

A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol.

Our school recognises the impact that being a Young Carer can have on pupils, and the importance of identifying those young people so that appropriate support can be provided.

Where a pupil / student at our school is identified as having additional support needs due to being a young carer, or where a multi-agency approach may be required, our school uses the Early Help Framework and routes into the StartWell Service.

### **Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or report.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

### **Monitoring & Evaluation**

Our Child Protection policy and procedures will be monitored and updated by:

- Governing Body visits to the school
- SLT drop ins and discussions with children, young people and staff
- Pupil / student surveys and questionnaires
- Scrutiny of exclusion and attendance data
- Scrutiny of Governing Body minutes
- Logs of bullying / racist / behaviour incidents for SLT and Governing Body to monitor

- Review of parental concerns and parent / carer questionnaires
- Review of the use of intervention strategies such as nurture room and isolation room.

This policy should be read in alongside other policies relevant to the safety and welfare of our pupils.

## Glossary

A Child	A person who has not yet reached their 18 <sup>th</sup> birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"> <li>• repeated</li> <li>• intended to hurt someone either physically or emotionally</li> <li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li> </ul>
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the Victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The Victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability - a physical or mental impairment, which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
County Lines	This is a term used to describe one form of criminal exploitation and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or Peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: <ul style="list-style-type: none"> <li>• psychological</li> <li>• physical</li> <li>• sexual</li> <li>• financial</li> <li>• emotional</li> </ul>
Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.



	It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done.
Gangs & Youth Violence	<p>Defining a gang is difficult. They tend to fall into three categories; Peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some Peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.</p> <p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation.</li> </ul>
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Neglect	<p>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• Protect a child from physical and emotional harm or danger.</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>
Child-on-child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their Peers who are the same or similar age; everyone directly involved in Child-on-child abuse is under the age of 18.
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (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. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Radicalisation & Extremism	<p>Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p> <p>Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.</p>
Relationship Abuse	<p>Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.</p>
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing impairment of children’s health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>• taking action to enable all children to have the best outcomes.</li> </ul>
Sexting	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.</p> <p>They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.</p>
Sexual Abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children</p>
Trafficking	<p>Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.</p>

## Appendix 1

### **Recognising signs of child abuse**

#### *Signs of Abuse in Children:*

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

- ✦ Significant change in behaviour
- ✦ Extreme anger or sadness
- ✦ Aggressive and attention-seeking behaviour
- ✦ Suspicious bruises with unsatisfactory explanations
- ✦ Lack of self-esteem
- ✦ Self-injury
- ✦ Depression
- ✦ Age inappropriate sexual behaviour
- ✦ Child Sexual Exploitation.
- ✦ Children who are missing from education or whose parents/ carers have expressed an intention to educate them at home.

#### *Risk Indicators*

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

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

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

In an abusive relationship the child may:

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

The parent or carer may:

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

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

#### *Recognising Physical Abuse*

The following are often regarded as indicators of concern:

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

### *Bruising*

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

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

### *Bite marks*

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

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

### *Burns and Scalds*

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

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

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

### *Fractures*

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

### *Scars*

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

### *Recognising Emotional Abuse*

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

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach

- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

### Recognising Signs of Sexual Abuse

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

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

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

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

### Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

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

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

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour. Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

### Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of Victim resistance.

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

### Recognising Neglect

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

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

### Child Sexual Exploitation

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

Signs include:

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

### Criminal Exploitation / County Lines

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be Victims of Criminal Exploitation / County Lines

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewelry
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly disheveled
- Having hotel cards or keys to unknown places

**The following information outlines clearly and in specific detail, specific safeguarding issues, in accordance with KCSiE 2022 and in addition to the above issues. Some information may be repeated from other parts of this document, but it is useful to have such guidance in one place for ease of access:**

### **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.

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.

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, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- 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

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.

### **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 copying videos or images.

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.

### **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. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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 children (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 nude and semi-nude 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 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.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. 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 (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't 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, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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.

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. The Deanery Church of England High School works with GMP in receiving timely Operation Encompass Reports, logging these reports and acting upon them.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

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

The DSL/ Pastoral teams/ DDSLs will be aware of contact details and referral routes in to 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. Routes to support homelessness in Wigan are found here: [Homelessness \(wigan.gov.uk\)](http://wigan.gov.uk/homelessness)

### **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)
- FGM being known to be practised in the girl's community or country of origin
- 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/carers 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.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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 refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **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.

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.

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

Sexual violence and sexual harassment can occur:

- Between 2 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 any form of abuse or neglect. 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
- 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.

### **Serious violence**

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

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

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

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

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

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

All visitors will be required to verify their identity to the satisfaction of staff and to leave 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 sign the visitors' book and wear a visitor's badge.

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 or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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 disseminate extremist views, and 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.

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

If a child is not collected at the end of the session/day, we will:

- Attempt to contact all adults on our system
- Encourage the pupil to use their mobile phones to contact all adults known on our system
- Attempt to take the child home, with 2 or more appropriate adults
- Contact social care/ GMP if necessary

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Inform parents within 1 hour

Inform the police within 1 hour

## **Appendix 2**

### Forced Marriage (FM)

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

### Female Genital Mutilation (FGM)

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

#### *4 types of procedure:*

Type 1 Clitoridectomy – partial/total removal of clitoris

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

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

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

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

Belief that:

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

Circumstances and occurrences that may point to FGM happening

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

Signs that may indicate a child has undergone FGM:

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

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

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action without delay.

To: All Schools and Academies

**Our reference:** HRESC

**Your**

**reference:**

**Please ask**

HR Employment

**for:**

Service Centre

**Extension:**

2333

**Direct line:**

01942 827333

**Date:**

4<sup>th</sup> August 2023

Dear Colleague

**DBS Checks for School Visitors**

I write to confirm the situation regarding safeguarding checks for Wigan Council employees who visit and work in schools and settings.

I can confirm that any visitor who is employed directly by Wigan Council will have had their post assessed for eligibility for a DBS check, including an assessment of the work they do directly in schools and settings. I can therefore confirm that council employees would not have been employed without an acceptable clearance being received. Therefore, if your visitor is a current Wigan Council employee you can be assured that they have received the appropriate clearances in line with the national safeguarding guidance and this letter will provide the evidence you will require for your records. You should of course check their Wigan Council badge to confirm their identity.

I hope you find this advice useful. If you have any questions or wish to clarify any areas, please contact me. As lead counter signatory, I am available to provide advice on any DBS issues you may have.

Yours sincerely,

Alison Hibbert  
Lead Counter Signatory



# Bridgewater Community Healthcare



NHS Foundation Trust Human Resources

Bevan House  
Beecham Court  
Smithy Brook Road  
Wigan  
WN3 6PR

Wigan Borough Head Teachers  
9<sup>th</sup> February 2017

Tel: 01942 482965

Dear Head Teacher

**RE: DBS Checks**

Bridgewater Community Healthcare NHS Foundation Trust operates a Report and Barring Service (DBS) Policy based on the requirements of the Police Act 1997 and the mandatory pre-employment checking procedure requirements of the Department of Health. The Policy ensures that enhanced DBS checks are mandatory for every staff member who has access to children or vulnerable adults as part of their normal duties or standard DBS checks for staff who have access to health care records. New staff are not allowed to start in post until their DBS and all other relevant pre-employment checks have been completed. Such checks must be satisfactory and in line with national NHS safe recruitment standards.

In line with the requirements of this Policy, all staff working with children or vulnerable adults are subject to enhanced DBS checks prior to being offered a contract of employment.

All Trust staff are required to display their identification badges on their person at all times to confirm to Schools and other providers that they are subject to this safeguarding process.

Where a DBS report provides information about allegations and/or convictions relating to children or an allegation is made about an existing member of staff, the nominated Senior Officer will share that information with the Local Authority Designated Officer in accordance with the requirements of Safeguarding Vulnerable Groups Act 2006.

If you have any further queries, please do not hesitate to contact the Trust's Human Resources Department via the contact details detailed at the top of this letter.

We are more than happy to work with you and members of your Team to confirm/validate our staff members' identification when they present at your premises.

Yours sincerely

**Paula Woods**  
**Assistant Director Workforce**

**CHILDREN MISSING EDUCATION CHECKLIST**  
**June 2022 V5**

As outlined in the statutory guidance for Local Authorities 'Children Missing from Education' are children of compulsory school age who are not a registered pupil at a school or are not receiving suitable education other if they are not registered at a school.

Where a pupil has not returned to school for ten days without authorisation the school and the local authority have a responsibility to jointly make reasonable enquiries to establish the whereabouts of the child. The appropriate completion of this checklist ensures that the Local Authority and school have fulfilled this responsibility.

It is school's responsibility to follow up all unexplained and unexpected absences in a timely manner and every effort should be made to establish the reason for a pupil's absence. If you require advice and guidance, please contact the Children Missing Education inbox [CME@wigan.gov.uk](mailto:CME@wigan.gov.uk). Where there are concerns in relation to safeguarding or child protection issues contact the Children First Partnership Hub on 01942 828300.

It is important that one checklist is completed for each child within the family, please do not include all children on one.

During the first 10 days of absence (reason unknown), school must complete this referral form and checklist. Once completed if the child's whereabouts remains unknown, please make a referral to the Children Missing Education [CME@wigan.gov.uk](mailto:CME@wigan.gov.uk) within 5 days or earlier if all checks have been completed.

**At any point if you feel a child is at risk of significant harm, FGM, human trafficking or sexual exploitation refer immediately to social care please contact 01942 828300**

Please note that if the child is residing or located in the Wigan Borough, they are not a CME and should not be removed from school roll. Policies in relation to school attendance should be followed in these cases.

**CHILD'S INFORMATION:**

Child's Name:		DOB:
Child's Address:		
Previous Address: (if known)		
School:		
Parent/carer's names:		
Parent/carer's address:		
Contact names & numbers: (include emergency)		
Any known siblings & school:		
Reason for CME checks:		
Any other agencies involved:		
Known vulnerability/risk factors Do you feel this child is at risk of harm or neglect <b>Y/N</b> please provide detail:		
Is this child Gypsy Roma Traveller? <b>Y/N</b>		
Is this child parents service personnel? <b>Y/N</b>		
Has this child had any Missing from home episodes? <b>Y/N</b>		
Is this child known to the Youth Justice System? <b>Y/N</b>		
Does this child have any SEN/learning needs? <b>Y/N</b>		
Are there any other vulnerabilities you are aware of? Please provide detail;		
Date:		

**All boxes must be completed, of not relevant please enter N/A**

**CHECKLIST:**

<b><u>Name of Member of staff completing form</u></b>			
<b><u>School checklist</u></b>	<b><u>Dates/ Times</u></b>	<b><u>Outcomes</u></b>	<b><u>Name</u></b>
School to attempt to contact parent on first day of absence.  This includes Truancy Call, First Day calling, Text, Email, all emergency			

contacts. Please detail all contact methods - whether a message was left, if the phone is working, is there an international dialling tone.			
School to check possible whereabouts with staff and pupils?  This should include checking with family friends, all staff members, the child's friends, social media Contact all emergency contact numbers you hold in school.			
Visit to address(es) by school.  Leave card if no answer Does the property look empty? Is someone at home but not answering the door? NB if school policy does not permit home visit a police welfare check to be requested			
Contact made with involved agencies within 5 working days (Social Care, EMAS team, School Nurse etc)			
Contact made with agencies to understand when they last had contact/saw the child (no consent needed) - Social care - school nurse (when did health have any contact with the child)			
School to contact the new school or Local Authority the child is believed to have moved to? What were the outcomes? <a href="https://www.gov.uk/find-local-council">https://www.gov.uk/find-local-council</a>			
NB – Has the child been seen? State when & by whom If not seen, what further action has been taken? (Refer to CME Policy Doc for advice)			

**ALL BOXES MUST BE COMPLETED, IF NOT RELEVANT PLEASE ENTER N/A**

Please submit this referral to  
[CME@wigan.gov.uk](mailto:CME@wigan.gov.uk)

## Appendix 5

### **KS3 and KS4 PSHE Overview**

**All PSHE for KS3 and KS4 will follow the following themes where possible.**

Term 1: Core Theme 1: HEALTH AND WELLBEING

Term 2: Core Theme 2: RELATIONSHIPS

Term 3: Core Theme 3: LIVING IN THE WIDER WORLD

The below plan consists of an overview of the content that each year will cover during their form time PSHE sessions. This does not include days off timetable where years will be taken out of lesson for up to 1 day where sessions will be delivered by external parties. The topics outlined are fluid. They will be changed and adapted to suit relevancy and topical issues.

### **Year 7**

<b>Autumn Term</b>		
<b>Core Theme 1: Health and Wellbeing</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Autumn Half Term 1	Conwy Trip Mental Health	How to manage transition How to maintain physical, mental and emotional health and wellbeing
Autumn Half Term 2	Social Media	The role and influence of the media on lifestyle

<b>Spring Term</b>		
<b>Core Theme 2: Relationships</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Spring Half Term 1	Puberty and Emotions	How to recognise and manage emotions within a range of relationships
Spring Half Term 2	Values: Respect and Equality (Respect)	To respect equality and be a productive member of a diverse community

<b>Summer Term</b>		
<b>Core Theme 3: Living in the Wider World</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Summer Half Term 1	Aspire	How to develop employability, team working and leadership skills and develop flexibility and resilience
Summer Half Term 2	Politics and Debate	About the economic and business environment

## **Year 8**

<b>Autumn Term</b>		
<b>Core Theme 1: Health and Wellbeing</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Autumn Half Term 1	Healthy Lifestyle	How to maintain physical, mental and emotional health and wellbeing
Autumn Half Term 2	First Aid Options Workshop	How to respond in an emergency, including administering first aid

<b>Spring Term</b>		
<b>Core Theme 2: Relationships</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Spring Half Term 1	Deanery against bullying	How to deal with risky or negative relationships including all forms of bullying (including the distinct challenges posed by online bullying) and abuse, sexual and other violence and online encounters
Spring Half Term 2	Changes and Loss	About managing loss including bereavement, separation and divorce

<b>Summer Term</b>		
<b>Core Theme 3: Living in the Wider World</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Summer Half Term 1	Values: Responsible Citizen (Trust)	About rights and responsibilities as members of diverse communities, as active citizens and participants in the local and national economy
Summer Half Term 2	Laws and Debate	About rights and responsibilities as members of diverse communities, as active citizens and participants in the local and national economy

## Year 9

<b>Autumn Term</b>		
<b>Core Theme 1: Health and Wellbeing</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Autumn Half Term 1	Safety and Help	How to assess and manage risks to health; and to keep themselves and others safe How to identify and access help, advice and support
Autumn Half Term 2	Sex Ed Drugs and Alcohol	How to make informed choices about health and wellbeing matters including drugs, alcohol and tobacco; maintaining a balanced diet; physical activity; mental and emotional health and wellbeing; and sexual health*  About parenthood and the consequences of teenage pregnancy*

<b>Spring Term</b>		
<b>Core Theme 2: Relationships</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Spring Half Term 1	Healthy Relationship	How to develop and maintain a variety of healthy relationships within a range of social/cultural contexts and to develop parenting skills
Spring Half Term 2	I say yes	About the concept of consent in a variety of contexts (including in sexual relationships)  How to identify and access appropriate advice and support

<b>Summer Term</b>		
<b>Core Theme 3: Living in the Wider World</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Summer Half Term 1	Managing Finance	How personal financial choices can affect oneself and others and about rights and responsibilities as consumers
Summer Half Term 2	Aspire 2 (GCSE Ready)	How to make informed choices and be enterprising and ambitious

## Year 10

<b>Autumn Term</b>		
<b>Core Theme 1: Health and Wellbeing</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Autumn Half Term 1	Body Image and Media	How the media portrays young people; to recognise its possible impact on body image and health issues
Autumn Half Term 2	Business and Enterprise: Christmas Markets	To further develop study and employability skills (including time management, self-organisation and presentation, project planning, team-working)

<b>Spring Term</b>		
<b>Core Theme 2: Relationships</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Spring Half Term 1	Healthy Relationships	The characteristics and benefits of positive, strong, supportive, equal relationships
Spring Half Term 2	Unintended Pregnancy	To understand the consequences of unintended pregnancy and of teenage parenthood (in the context of learning about parenting skills and qualities and their importance to family life)

<b>Summer Term</b>		
<b>Core Theme 3: Living in the Wider World</b>		
<b>Term</b>	<b>Topic</b>	<b>PSHE Spec</b>
Summer Term 1 Half	Terrorism, A normal part of life?	To think critically about extremism and intolerance in whatever forms they take (including religious, racist and political extremism, the concept of 'shame' and 'honour based' violence)
Summer Term 2 Half	Cults Positives and Negatives of Social Media	How to recognise a 'cult'; how it differs from other types of group; how cults recruit; how to seek help if they are worried for themselves or for others <b>How social media can offer opportunities to engage with a wide variety of views on different issues</b>



## **Year 11**

<b>Autumn Term Core Theme 1: Health and Wellbeing</b>		
<b><u>Term</u></b>	<b><u>Topic</u></b>	<b><u>PSHE Spec</u></b>
Autumn Half Term 1	Social Life	About personal safety and protection, how to reduce risk and minimise harm in different settings (including social settings, the workplace, the street, on roads and during travel)
Autumn Half Term 2	Use of Legal and illegal substances	the short and long-term consequences of substance use and misuse for the health and mental and emotional wellbeing of individuals, families and communities, including the health risks related to second-hand smoke

<b>Spring Term Core Theme 2: Relationships</b>		
<b><u>Term</u></b>	<b><u>Topic</u></b>	<b><u>PSHE Spec</u></b>
Spring Half Term 1	Awareness of Negative Relationships	To develop an awareness of exploitation, bullying, harassment and control in relationships (including the unique challenges posed by online abuse and the unacceptability of physical, emotional, sexual abuse in all types of teenage relationship)
Spring Half Term 2	'Normal' Family Abortion and Opinions	The reasons why parents choose to adopt/foster or to place children for adoption/fostering <b>A</b> bout abortion, including the current legal position and the range of beliefs and opinions about it

<b>Summer Term Core Theme 3: Living in the Wider World</b>		
<b><u>Term</u></b>	<b><u>Topic</u></b>	<b><u>PSHE Spec</u></b>
Summer Term 1 Half	Financial Literacy Debt Gambling/Support	To recognise and manage the influences on their financial decisions, (including managing risk, planning for expenditure, understanding debt and gambling)
Summer Term 2 Half	Careers and Employability	About the range of opportunities available to them for career progression, including in education, training and employment

## **Appendix 6**

### **Recruitment and selection process**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

## **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## **Pre-appointment vetting checks**

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. We will explicitly tell job applicants that we will conduct online searches as part of due diligence checks before or at the time of their interview.

## **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- 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
- 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 of professional standing from the professional regulating authority in the country where the applicant has worked

**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**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- 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
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
  - We believe 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 obtain the DBS check for self-employed contractors.
- 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.

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 who are new to working in regulated activity
- 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 retain a record of this risk assessment
- 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).
- Right to work in the UK- Other checks deemed necessary if they have lived or worked outside the UK

### **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. We continue to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil.

### **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 7 Allegations Against - Staff Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors**

This part of the KCSIE 2022 guidance has two sections covering the two levels of concerns and allegations:

1. Concerns / allegations that **may** meet the harm threshold.
2. Concerns / allegations that **do not** meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.

### **Section 1. Allegations that may meet the harms threshold**

This section is based on KCSIE 2022 para 353: 'Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused 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 there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and 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 assistant 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/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **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, or to cause harm to the subject of the allegation
- **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 case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. 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 designated officer – 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 designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (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), 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. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. 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 within 1 working day, and the individual will be given a named contact 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 designated officer 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 designated officer 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.
- 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 teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

- 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

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, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school 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 teachers and all contracted staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to 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**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

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

The case manager will discuss with the local authority's designated officer 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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.



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

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

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, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) 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, 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer 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.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## 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.

## Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Report made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children

- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Creating an open culture so that all stakeholders can approach and feel supported by the Headteacher/DSL and that such reports are dealt with sensitively and confidentially by them.

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

[\[Developing and implementing a low-level concerns policy: A guide for organisations which work with children\]](#)

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

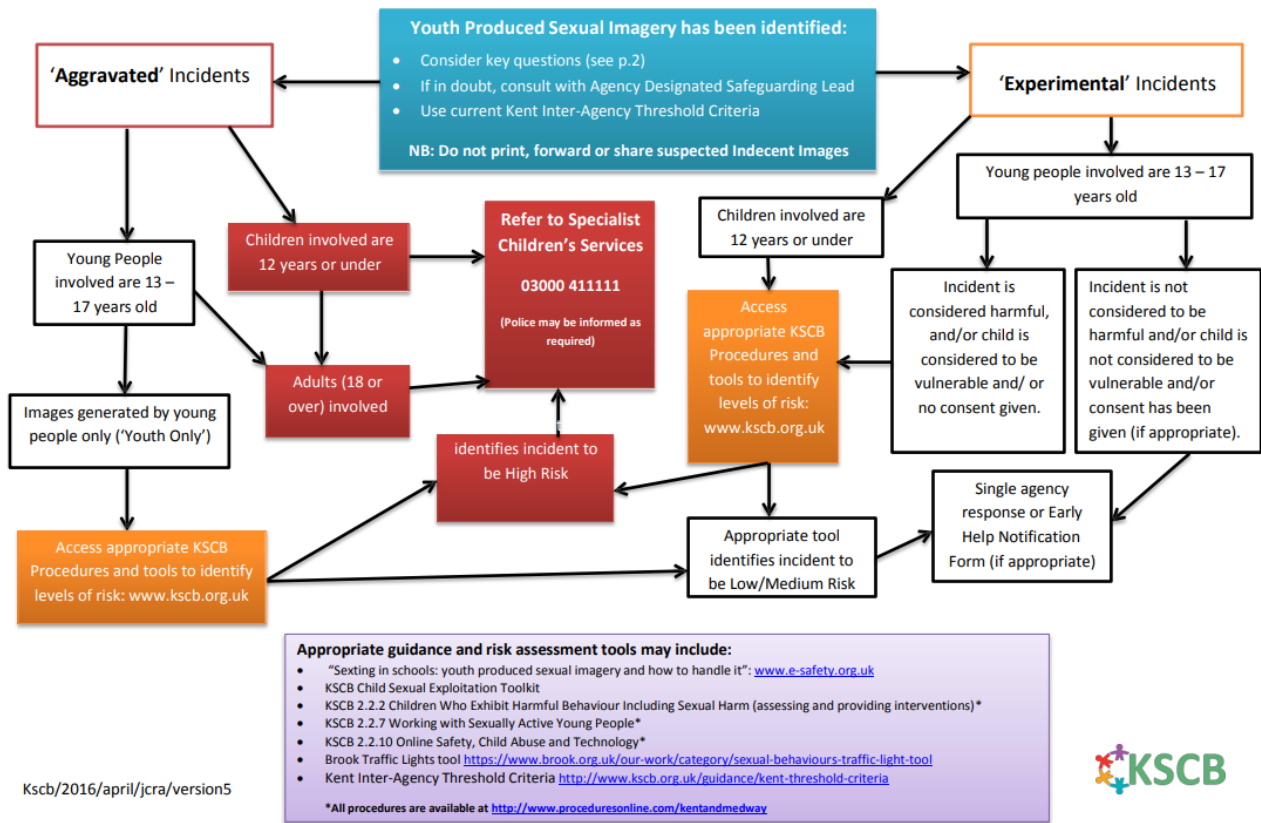
### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

**Appendix 8 – Sexual Imagery Process**

**Responding to Youth Produced Sexual Imagery**



Kscb/2016/april/jcra/version5

\*\* Please note the references in this document is for Kent LA, but the process is good and will be used as a guide for our school.

## **Appendix 9 DfE Guidance March 2022: Meeting digital and technology standards in schools and colleges.**

You should identify and assign roles and responsibilities to manage your filtering and monitoring systems

### ***Importance***

Schools and colleges should provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It's important that the right people are working together and using their professional expertise to make informed decisions.

### ***How to meet the standard***

Governing bodies and proprietors have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

To do this, they should identify and assign:

a member of the senior leadership team and a governor, to be responsible for ensuring these standards are met

the roles and responsibilities of staff and third parties, for example, external service providers

We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school, college, or trust. However, it must be clear who is responsible and it must be possible to make prompt changes to your provision.

### ***Technical requirements to meet the standard***

The senior leadership team are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports

They are also responsible for making sure that all staff:

- understand their role
- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

Senior leaders should work closely with governors or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider.

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support.

The DSL should take lead responsibility for safeguarding and online safety, which could include overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The IT service provider should have technical responsibility for:

- maintaining filtering and monitoring systems

- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

You should review your filtering and monitoring provision at least annually

### ***Importance***

For filtering and monitoring to be effective it should meet the needs of your pupils and staff, and reflect your specific use of technology while minimising potential harms.

To understand and evaluate the changing needs and potential risks of your school or college, you should review your filtering and monitoring provision, at least annually.

Additional checks to filtering and monitoring need to be informed by the review process so that governing bodies and proprietors have assurance that systems are working effectively and meeting safeguarding obligations.

### ***How to meet the standard***

Governing bodies and proprietors have overall strategic responsibility for meeting this standard. They should make sure that filtering and monitoring provision is reviewed, which can be part of a wider online safety review, at least annually.

The review should be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider and involve the responsible governor. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

Your IT service provider may be a staff technician or an external service provider.

### ***Technical requirements to meet the standard***

A review of filtering and monitoring should be carried out to identify your current provision, any gaps, and the specific needs of your pupils and staff.

You need to understand:

- the risk profile of your pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what your filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of your pupils
- teaching requirements, for example, your RHSE and PSHE curriculum
- the specific use of your chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies you have in place
- what checks are currently taking place and how resulting actions are handled

To make your filtering and monitoring provision effective, your review should inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked

- monitoring strategies

The review should be done as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, like remote access or BYOD
- new technology is introduced

There are templates and advice in the reviewing online safety section of Keeping children safe in education.

Checks to your filtering provision need to be completed and recorded as part of your filtering and monitoring review process. How often the checks take place should be based on your context, the risks highlighted in your filtering and monitoring review, and any other risk assessments. Checks should be undertaken from both a safeguarding and IT perspective.

When checking filtering and monitoring systems you should make sure that the system setup has not changed or been deactivated. The checks should include a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

You should keep a log of your checks so they can be reviewed. You should record:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

You should make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

You can use South West Grid for Learning's (SWGfL) testing tool to check that your filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content

Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning

### ***Importance***

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. You need to understand the coverage of your filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements in Keeping children safe in education (KCSIE) and the Prevent duty.

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves



### ***How to meet the standard***

Governing bodies and proprietors need to support the senior leadership team to procure and set up systems which meet this standard and the risk profile of the school or college.

Management of filtering systems requires the specialist knowledge of both safeguarding and IT staff to be effective. You may need to ask your filtering provider for system specific training and support.

### ***Technical requirements to meet the standard***

Make sure your filtering provider is:

- a member of Internet Watch Foundation (IWF)
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocking access to illegal content including child sexual abuse material (CSAM)

If the filtering provision is procured with a broadband service, make sure it meets the needs of your school or college.

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts
- school owned devices
- devices using the school broadband connection

Your filtering system should:

- filter all internet feeds, including any backup connections
- be age and ability appropriate for the users, and be suitable for educational settings
- handle multilingual web content, images, common misspellings and abbreviations
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them
- provide alerts when any web content has been blocked

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff, such as the senior leadership team or the designated safeguarding lead.

Your filtering systems should allow you to identify:

- device name or ID, IP address, and where possible, the individual
- the time and date of attempted access
- the search term or content being blocked
- Schools and colleges will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. A DPIA template is available from the ICO.

The DfE data protection toolkit includes guidance on privacy notices and DPIAs.

The UK Safer Internet Centre has guidance on establishing appropriate filtering.

Your senior leadership team may decide to enforce Safe Search, or a child friendly search engine or tools, to provide an additional level of protection for your users on top of the filtering service.

All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material
- Dependencies to the standard

Check that you meet:

- Broadband internet standards
- Cyber security standards (as outlined in our Online Safety Policy)

You should have effective monitoring strategies that meet the safeguarding needs of your school or college

### ***Importance***

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.

Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

### ***How to meet the standard***

Governing bodies and proprietors should support the senior leadership team to make sure effective device monitoring is in place which meets this standard and the risk profile of the school or college.

The designated safeguarding lead (DSL) should take lead responsibility for any safeguarding and child protection matters that are picked up through monitoring.

The management of technical monitoring systems require the specialist knowledge of both safeguarding and IT staff to be effective. Training should be provided to make sure their knowledge is current. You may need to ask your monitoring system provider for system specific training and support.

### ***Technical requirements to meet the standard***

Governing bodies and proprietors should support the senior leadership team to review the effectiveness of your monitoring strategies and reporting process. Make sure that incidents are urgently picked up, acted on and outcomes are recorded. Incidents could be of a malicious, technical, or safeguarding nature. It should be clear to all staff how to deal with these incidents and who should lead on any actions.

The UK Safer Internet Centre has guidance for schools and colleges on establishing appropriate monitoring.

Device monitoring can be managed by IT staff or third party providers, who need to:

- make sure monitoring systems are working as expected
- provide reporting on pupil device activity
- receive safeguarding training including online safety
- record and report safeguarding concerns to the DSL

Make sure that:

- monitoring data is received in a format that your staff can understand
- users are identifiable to the school or college, so concerns can be traced back to an individual, including guest accounts

If mobile or app technologies are used then you should apply a technical monitoring system to the devices, as your filtering system might not pick up mobile or app content.

In the online safety section of Keeping children safe in education there is guidance on the 4 areas of risk that users may experience when online. Your monitoring provision should identify and alert you to behaviours associated with them.

Technical monitoring systems do not stop unsafe activities on a device or online. Staff should:

- provide effective supervision
- take steps to maintain awareness of how devices are being used by pupils
- report any safeguarding concerns to the DSL

School and college monitoring procedures need to be reflected in your Acceptable Use Policy and integrated into relevant online safety, safeguarding and organisational policies, such as privacy notices.

Schools and colleges that have a technical monitoring system will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. A DPIA template is available from the ICO.

The DfE data protection toolkit includes guidance on privacy notices and DPIAs.

***Dependencies to the standard***

Check that you meet:

- Cyber security standards