Hollingworth Academy

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# SAFEGUARDING & CHILD PROTECTION POLICY

*September 2025*

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| **Created by:** | Headteacher & SLT |
| **Approved by:** | Governing Body |
| **Date approved:** | October 2025 |
| **Next review date:** | September 2026 |

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**Academy and Local Key Contacts**

| ROLE | NAME | CONTACT DETAILS |
|---|---|---|
| Designated Safeguarding Lead (DSL) | Bobbie Robinson | 01706 292806 07850752779<br>brobinson@hollingworthacademy.co.uk |
| Deputy DSL | Kelle Murray<br>Cheryl Johnson<br>Emma Wigglesworth | 01706 292800<br>01706 292800<br>01706 292800 |
| Chair of governors | Jacqui Mellor | 01706 292800 |

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|---|---|---|
| Safeguarding link governor | Katie Digiorgi | 01706 292800 |
| Local Authority Designated Officer (LADO) for allegations against professionals | Louise Hurst | 0300 3030350<br>lado@rochdale.gov.uk<br>Louise.hurst@rochdale.gov.uk |
| Education safeguarding officer | Hayley Reynolds | 01706 925350<br>hayley.reynolds@rochdale.gov.uk |
| EHASH | Multi agency complex early help and safeguarding hub | 0300 303 0440<br>Out of hours 0300 3038875 |
| LA Prevent Officer | Muhammad Abdulaleem | 01706 926437<br>muhammad.abdulaleem@rochdale.gov.uk |
| Head of the Virtual School | Kirstie Rathbone | 01706 925126<br>kirstie.rathbone@rochdale.gov.uk |
| Attendance and Safeguarding Officer | Katie Digiorgi | 01706 925139<br>Katie.digiorgi@rochdale.gov.uk |

## Worried About a Child?

All reports or enquiries concerning the welfare or safety of a child must go straight to EHASH on 0300 303 0440 as the first port of call. This applies to reports from council staff, the public, partners and outside agencies. All referrals are then to be sent to *ehash@rochdale.gov.uk*

If a child is in immediate danger of being harmed, or if a child is home alone, the police should be called on 999.

## 1. Aims

At Hollingworth Academy we recognise safeguarding and promoting the welfare of children is everyone's responsibility and that the best interests of the child are paramount. As everyone who comes into contact with children and their families has a vital role to play, this policy has been developed to provide a shared understanding of expectations.

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

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly training in recognising and reporting safeguarding issues.

## 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2022), Working Together to Safeguard Children (2023), and the Governance Handbook.

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners via Rochdale Borough Safeguarding Children Partnership (RBSCP).

Local safeguarding partners, are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017. They are responsible for child protection policy, procedure and guidance at a local level.

The local safeguarding arrangements are led by three statutory safeguarding partners: ○ the local authority

○ the integrated care board (ICB, previously clinical commissioning group or 'CCG') ○ the police.

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent Academy Standards) Regulations 2014, which places a duty on schools and independent schools to safeguard and promote the welfare of students at the academy/academy.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the CounterTerrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our academy to take positive action to deal with particular disadvantages

affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

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

This policy also complies with our funding agreement and articles of association.

Policy documents and pathways relating to local processes and procedure can be found by visiting;

https://rochdalesafeguarding.com/p/resources-and-tools

## 3. Definitions

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

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- **Essentially, safeguarding is how you ensure the safety of the children in your care. It is the responsibility of every professional that comes into contact with a child, not simply those who work in education.**

**The term Abuse** is defined as;

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

**Exploitation** is a form of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

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

- The local authority (Rochdale LA)
- NHS Greater Manchester Integrated Care for an area within the LA
- The chief officer of police for a police area in the LA area

In Rochdale, our partnership is the RBSCP and our local safeguarding procedures are found at; Rochdale Safeguarding Partnership Board – **Language:**

"the way the 'world' talks about us, acts as a guide to how others view us, and gives us a narrative to identify with"

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

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

## 4. Equality statement

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

- Have special educational needs (SEN) or disabilities or health conditions (see section 10).
- Are young carers.
- May experience discrimination due to their age, disability, sexual orientation, sex, gender, race, religion and belief (Which are deemed as protective characteristics within the Equality Act 2010).
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual or criminal exploitation, so-called honour-based violence or abuse, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Have a social worker (see section 11).
- Are looked after or previously looked after (see section 12).
- Are absent or missing from home or education repeatedly and/or for prolonged times.
- Whose parent/carer has expressed an intention to remove them from the academy to be home educated.

Staff at Hollingworth Academy will provide safe spaces for all students, including those with protected characteristics, to speak out and share concerns

## 5. Roles and Responsibilities

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

We are committed that our academy plays a crucial role in preventative education. This is in the context of a whole-academy approach to preparing students for life in modern Britain and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy.
- Pastoral and peer support systems.
- Planned programme of relationships, sex and health education (RHE/RSHE), appropriate to the age and developmental stage of our children, which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships.

- Boundaries and consent.
- Stereotyping, prejudice and equality.
- Body confidence and self-esteem.
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
- How to recognise an abusive relationship.
- What constitutes sexual harassment and sexual violence and why they're always unacceptable.

### 5.1 All Staff

To ensure all members of our academy community fully understand their safeguarding responsibilities, it is our expectation that staff read and ensure they understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping children safe in education 2023 (publishing.service.gov.uk), and review this guidance at least annually.

There may however, be limited circumstances where senior leadership determine that an individual staff member or group of staff would obtain a better understanding of their safeguarding responsibilities by instead reading the condensed version of part 1, which is held at Annex A Keeping children safe in education 2023 (publishing.service.gov.uk). This would only be appropriate in exceptional circumstances, following approval by the Governing Board and with additional training provided to supplement and reinforce key messages to these staff groups.

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 (guidance for safe working practice), the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the attendance policy and the safeguarding response to children who go missing from education.

› The early help assessment process and their role in it, including identifying emerging needs, liaising with the DSL, and sharing information with other professionals to enable the right support to be offered to families at the earliest opportunity.

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

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

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

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

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

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

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

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

› All staff should be aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the academy/college, inside and outside of home and online Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

### 5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team. Our DSL is Bobbie Robinson. The DSL takes lead responsibility for child protection and wider safeguarding in the academy.

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

When the DSL is absent, the DDSL Andrew Harwood, Asima Jabeen, Kelle Murray and Cheryl Johnson will act as cover. Their contact details are on the first page of this policy.

Outside of term time, Hollingworth Academy has the following arrangements in place in respect of safeguarding contacts. Our safeguarding team can be contacted on 07518298713 and e-mails can be sent to DSL@hollingworthacademy.co.uk.

We recognise the highly challenging role of the DSL and will ensure our DSL will be given the time, funding, ongoing training, adequate resources and wider support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour in children and local pathways to access advice, undertake safety planning and support all children involved.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Promote and encourage a culture of listening to children and taking account of their wishes and feelings.
- Maintain clear and confidential records of safeguarding and child protection concerns, actions and planning. Hold and share relevant information in line with relevant data protection legislation.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Cannel programme, Disclosure and Barring Service, LADO, and/or Police)
- Act as a point of contact for partner agencies and families.
- Promote positive relationships with parents and families and support their ability to fully engage in the processes in order to uphold the welfare of the children, even when families may be facing difficult situations.
- Have a good understanding of harmful sexual behaviour in children and local pathways to access advice, undertake safety planning and support all children involved.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Know who its cohort of children who have or have had a social worker are, and to promote a culture of high aspiration for this cohort as well as to champion reasonable adjustments to ensure they reach their full potential.
- Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the academy or college.

The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and DDSL are set out in their job description.

### 5.3 The Governing Board

The governing board will:

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

- Receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole academy approach to safeguarding ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Their training should be regularly updated.

- 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.

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

- Provide appropriate oversight and challenge to ensure the academy has the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and ensure a review of the effectiveness of these procedures takes place periodically to keep up with evolving cyber-crime technologies.

- Ensure:
    - The DSL has the appropriate status and authority to carry out their job, including time, funding, training, resources and support.
    - Online safety is a running and interrelated theme within the whole-academy 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 academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). *Appendix 3 of this policy covers this procedure.*
    - That academy safeguarding responses recognise that children with SEND, or certain medical or physical health conditions, can face additional barriers to abuse or neglect being recognised.

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the academy 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 academy about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

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

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

Section 15 of this policy has information on how governors are supported to fulfil their role.

### 5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

› Communicating this policy to parents/carers when their child joins the academy and via the academy website.

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

› Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly.

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

› Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL.

### 5.5 Virtual School Heads

The Virtual School Head is the statutory lead **(Children and Families Act 2014**) within the local authority. They have a strategic responsibility for ensuring that arrangements are in place to improve educational experiences and outcomes of children in care and young people previously cared for. Their role has now also been extended to include those children who have currently, or have previously had a social worker.

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

## 6. Confidentiality

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

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

The academy follows the DfE guidance; information sharing advice for safeguarding practitioners and data protection toolkit for schools

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

## 7. Recognising Abuse and Taking Action

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

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

### 7.1 If A Child Is Suffering or Likely to Suffer Harm, Or in Immediate Danger

Within the academy, referrals should usually be made via the DSL, who is the person with the complete safeguarding picture in relation to children. Therefore, if you believe a child is suffering or likely to suffer from harm, you should **immediately** locate the DSL in person to share this information.

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

Referrals in Rochdale should be made via telephone in the first instance, to the Complex Early Help and Safeguarding Hub (EHASH) on 0300 303 0440. Advice will be provided about what actions need to be taken,

which may include submission of a multi-agency referral form (MARF). Further information can be found at Rochdale LA website - reporting concerns about a child

### 7.2 If a Child Makes a Disclosure to You

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- 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.
- Find the DSL and share the information straight away. It is not sufficient to leave a note on a desk.
- Write up your conversation as soon as possible, using the child's own words. Provide facts, be clear if you are stating your professional opinion. Include information about impact on the child – e.g. if they are tearful, appear anxious, appear unaffected. Ensure details are precise – date, time, location and give context including what happened prior to the disclosure, was there an identified trigger etc.
- Pass on the record to the DSL. Alternatively, if appropriate, make a referral to the local authority 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.
- Consider what follow up support the child may require in the academy and who would be the most appropriate person to offer this.

Bear in mind that disclosure is rarely straightforward and some children may:

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

None of this should stop you from having 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

Honour based Violence and abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBVA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBVA, or already having suffered HBVA.

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

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

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

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Teachers can obtain support from the DSL, who will also contact the EHASH.

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

Staff must never examine students.

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

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures held at; RBSCP multi agency FGM procedure

**Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

- In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Should you become alerted to the possibility that a child may be expected to marry in any situation, you should refer to your safeguarding duties as in section 7.1.

### 7.4 If You Have Concerns About a Child (As Opposed to Believing a Child Is Suffering or Likely to Suffer from Harm, Or Is in Immediate Danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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 senior leadership team and/or take advice from local authority children's social care by telephoning EHASH. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. 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 (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### Early Help

If early help is appropriate, the safeguarding team 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.

The safeguarding team will keep the case under constant review, and the academy 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 safeguarding team 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.

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

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

### 7.5 If You Have Concerns About Extremism

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

If in exceptional circumstances a member of the safeguarding team is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

### 7.6 If You Have a Mental Health Concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to a member of the safeguarding team to agree a course of action, which may include referral to local support services or additional pastoral support within the academy.

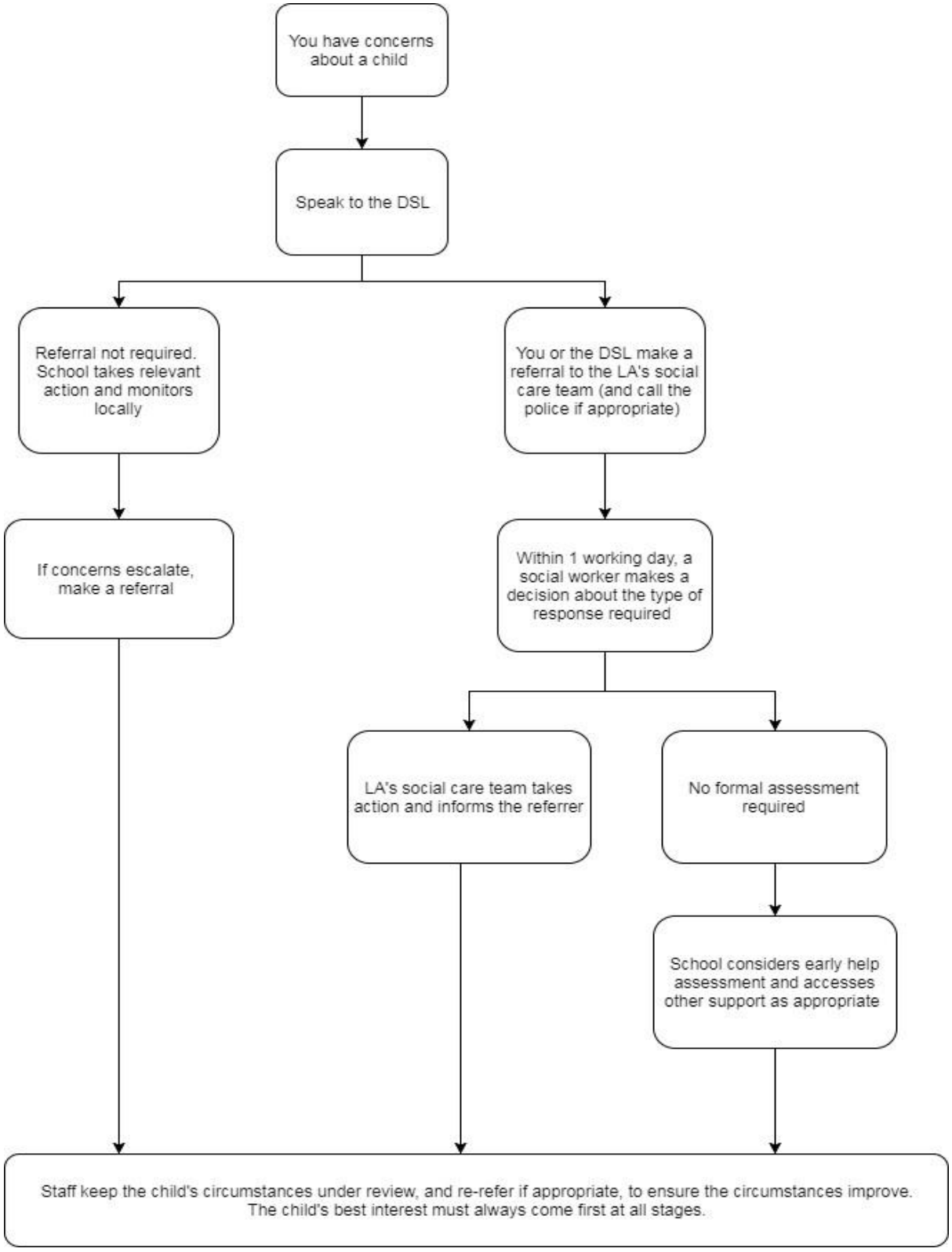
The member of the safeguarding team will take appropriate action to ensure the support necessary is put in place, this could be:

- Consultation with the MHST practitioner in the academy
- SPOA referral
- EBNA pathway
- Referral to EHASH
- Consultation with duty team at CAMHS
- In school support from the YMHFA team
- Signposting to online agencies such as kooth.com, Young Minds, #thrive
- Ring 999

In all cases parent/carer will be contacted and advice given if they are concerned or worried to contact their GP, access Oldham Hospital A&E department or in case of an emergency to contact 999. Parent/carer will also be offered Early Help if required.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)




### 7.7 Concerns About a Staff Member, Supply Teacher, Volunteer or Contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

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

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO). The contact details for the LADO are on the first page of this policy.

### 7.8 Allegations of Abuse Made Against Other Students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

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

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

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

See appendix 4 for more information about child-on-child abuse.

**Procedures For Dealing with Allegations of Child-On-Child Abuse**

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will discuss the incident with relevant staff within the academy, eg Head, Pastoral Officer etc to gain a picture of what happened. The academy should utilise relevant guidance and tools, (eg NSCPCC Hackett continuum Understanding sexualised behaviour in children | NSPCC Learning) to assess the level of severity in the behaviour and must record their decision and rationale for any outcome.
- The DSL may consult with Youth Justice Team and partner agencies about any concerns related to developmentally inappropriate sexual behaviour at weekly virtual triage meetings.
- Where there is an allegation of developmentally inappropriate behaviour that is harmful or abusive, or if there is a pattern of sexualised behaviour, the academy must contact EHASH for telephone consultation. If it is clear that a criminal offence has taken place eg sexual assault, the academy must seek advice from EHASH about how this should be reported to the Police.
- The DSL will put a safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport/travel to and from the academy, less structured times of the academy day e.g. break time, lunch, after school activities, outdoor learning and educational visits, assembly and transition times where children may mix more widely. The academy can seek input and specialist advice from Youth Justice Team, who have expertise in harmful sexual behaviour. The Local Authority have suggested the following document when considering safety planning for children after such an incident has taken place: Safety planning in education: A guide for professionals supporting children following incidents of harmful sexual behaviour (csacentre.org.uk)
- The DSL will contact relevant support services, e.g. children and adolescent mental health services (CAMHS), HCRG Care (previously Virgin care) as appropriate. The academy may seek advice from the Early Help Locality Team about which services may be relevant to support the needs of the children impacted.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will refer all cases of harmful sexual behaviour, including sexual violence and harassment between peers to EHASH for consideration of threshold for a harmful sexual behaviour strategy meeting.

- The DSL is able to consult with Youth Offending and partner agencies about any concerns related to harmful sexual behaviour at weekly virtual triage meetings.

**Creating A Supportive Environment in the Academy and Minimising the Risk of Child-On-Child Abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.

- Ensure our curriculum helps to educate students about respectful behaviour and consent.

- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below).

- Ensure staff reassure victims that they are being taken seriously.

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners. This may include the use of technology, AI, Chat GP and other online platforms.

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

- Ensure staff are trained to understand:

    - 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 the academy, 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 student 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 in order to effectively safeguard that child also.

○ 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 ○ That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will work closely with behaviour leads to provide support at the same time as taking any disciplinary action (if relevant) in respect of children that have harmed others.

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

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

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

### 7.9 Sharing of Nudes and Semi-Nudes ('Sexting')

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

You must **not**:

› View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.

› Delete the imagery or ask the student to delete it.

› Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

› Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.

› Say or do anything to blame or shame any young people involved.

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

The law criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people. Therefore, the academy will endeavour to ensure wherever possible that this does not happen, however it must be appreciated that sharing of nude, semi-nude images of children is in fact breaking the law. As an academy we understand that this can often be the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful behaviour'. We understand this will be different for all children and young people. Situations will be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. We will also consult with agencies and refer to existing guidance.

Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)

#### Initial Review Meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate academy 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 student(s).

› If a referral needs to be made to the police and/or local authority 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 students 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 students involved (in most cases parents/carers should be involved).

The DSL will make an immediate contact into EHASH if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the 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 student in the images or videos is under 13.
- The DSL has reason to believe a student 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, the DSL may wish to make a referral to the weekly HSB triage meeting or consult with EHASH for advice and support. All decision making must be recorded within the academy safeguarding records.

If none of the above apply then the DSL, must still consult with EHASH for advice about whether a harmful sexual behaviour strategy meeting is appropriate. DSLs are able to contact YOS for advice and support.

**Further Review by the DSL**

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

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

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

**Referring To the Police**

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

**Recording Incidents**

All incidents of sharing 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**

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes.

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.

Students 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 students so they are aware of the processes the academy will follow in the event of an incident.

### 7.10 Reporting Systems for Our Students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

› Put systems in place for students to confidently report abuse.

› Ensure our reporting systems are well promoted, easily understood and easily accessible for students.

› Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

› When sensitive topics are being delivered, students are reminded of the staff in the academy that can help

› The DSL and DDSL's are displayed on the screens and displays around the academy.

› Daily on the student bulletin there is information to signpost students to the DSL.

## 8. Online Safety and The Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. We take a whole academy approach to ensuring we protect and educate students, students, and staff in their use of technology and have in place established mechanisms to identify, intervene in, and escalate any concerns where appropriate.

To address this, our academy aims to:

› Have robust processes in place to ensure the online safety of students, staff, volunteers and governors.

› Protect and educate the whole academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').

› Set clear guidelines for the use of mobile phones for the whole academy community.

› Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

› Updated guidance makes it clear that all staff receive training on the expectations, applicable roles and responsibilities in relation to the filtering and monitoring of online information.

› The designated safeguarding lead should take lead responsibility for understanding the filtering and monitoring systems and processes in place. However, each school/academy will have a designated Governor and member of SLT that maintain oversight of this.

› Within this policy you will find information on appropriate filtering and monitoring on academy devices and academy networks.

› The guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

**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, misinformation, disinformation (including fake news) conspiracy, racism, misogyny/misandry, homophobia, biphobia, self-harm, suicide, anti-Semitism, radicalisation and extremism

› **Contact** – being subjected to harmful online interaction with other users, such as peer on 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 students 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 students are encouraged to do so, including where they are a witness rather than a victim.

› Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year. Staff are also alerted to the additional mitigations that may need to be in place for children with greater vulnerabilities and ensure that they are also effectively safeguarded.

› 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, in line with the Guidance for Safe Working Practice, for example that:

- Staff are allowed to bring their personal phones to the academy for their own use, but will limit such use to non-contact time when students are not present.
- Staff members' personal phones will remain in their bags or cupboards during contact time with students and care must be taken to secure personal devices so that children are unable to access them.
- Staff will not take pictures or recordings of students on their personal phones or cameras.

› Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academy, use of the academy's ICT systems and use of their mobile and smart technology.

› Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.

› Make sure all staff, students and parents/carers are aware that staff have the power to search students' 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 academy'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 academy community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our academy's policy on online safety and the use of mobile phones, please refer to our online safety policy.

## 9. 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 disclosure.

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 EHASH and seek their advice

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

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

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

## 10. Students With Special Educational Needs, Disabilities or Health Issues

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

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

We offer extra pastoral support for students with SEN and disabilities, which includes an allocated SEND support worker, all SEND students have a learning plan which is shared with all staff, alternative arrangements at break/lunch time, access to mentors, before and after school provision.

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

## 11. Students With a Social Worker

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

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- Page 10 of the following document outlines our academy's responsibility for these children in relation to improving their attendance: .Summary table of responsibilities for school attendance (publishing.service.gov.uk)
- The provision of pastoral and/or academic support.

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

## 12. Looked-After and Previously Looked-After Children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and consults with social care and the Rochdale virtual school head, Kirstie Rathbone on 01706925209 in respect of safeguarding concerns for these children

We have appointed a designated teacher, Andrew Harwood, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

## 13. Complaints and Concerns About Academy Safeguarding Policies

### 13.1 Complaints against staff

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

### 13.2 Other Complaints

If parents, carers or other individuals wish to raise a complaint with the academy, they will be directed to do so via the academy complaints procedure. The academy will deal with all complaints seriously.

### 13.3 Whistle-blowing

- All staff are made aware of their professional duty to raise concerns in relation to safeguarding, which may include the attitudes or actions of colleagues.
- We have a whistleblowing procedure, which outlines how anyone who makes a 'protected disclosure' is protected from being treated unfairly or being dismissed. This procedure is shared with all staff in their Induction and reminders are issued on an annual basis as part of safeguarding training.

## 14. 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. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern, reflecting the lived experience of the child.
- 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.

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 academy.

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 academy 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 student file.

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

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

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

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

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

At Hollingworth we have a form for recording concerns about a child; these are readily available in all workrooms and are on yellow paper. If there is a safeguarding concern, staff should follow the academy's Child Protection Protocol which states that they must record all the information on the yellow 'Cause for Concern' form, date and sign this and return to one of the Safeguarding Team. Safeguarding records pre 2020 are held in locked filing cabinets in the Designated Safeguarding Lead's office which has restricted access. All safeguarding information is now held electronically via CPOMS. There is also a safeguarding electronic file held on the academy's one drive, again this is hidden and only accessible to the Safeguarding Team and the Headteacher.

If there are concerns regarding a child, the Safeguarding Team hold weekly meetings to discuss individual cases. If there are sufficient concerns and evidence to warrant a referral, this is then passed to the Designated Safeguarding Lead to complete a detailed EHASH referral and submit this to the EHASH team. The DSL will contact EHASH to discuss the concerns before submitting the referral.

If a child joins the academy, then a form is completed by the previous school and one of the questions asked is "are there or have there been any child protection concerns?" and it asks the school to contact our Designated Safeguarding Lead to discuss this further and arrange for transfer of files. If a child transfers to another school, then the Designated Safeguarding Lead will pass on records to the new school within 5 days.

For the transition to Post 16 education, indications are given to the colleges following application of those children who have or have had child protection concerns. The files are passed onto the safeguarding staff at the colleges in the first week of term.

If a child leaves the academy and there is no record of the new school, a referral to the CME Team will be completed.

All Child Protection Files are sent separate to the main education file and are either hand delivered and signed for or posted recorded delivery.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and preemployment checks.
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 15. Training

### 15.1 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 academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole academy 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 students.

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

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

The academy will ensure that contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, as applicable.

### 15.2 The DSL and DDSL

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

In addition to this, they must attend advanced and contexual safeguarding training either via the Education Safeguarding Officer, RBSCP or another provider e.g. NSPCC, at least annually.

In addition, they will update their knowledge and skills at regular intervals (for example, through ebulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

### 15.3 Governors

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

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

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

### 15.4 Recruitment – Interview Panels

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

See appendix 2 of this policy for more information about our safer recruitment procedures.

## 16. Monitoring Arrangements

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

## 17. Links With Other Policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct (Guidance for safe working practice)
- Whistleblowing
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices

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

## Appendix 1: Types Of Abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.

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

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and

CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child criminal exploitation (CCE)13

- Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines.
- Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.
- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.
- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside.

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

### 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 academy'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.
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online, in line with advice from HR and with prior knowledge from the candidate.

**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 academy 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 academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. These records are stored confidentially, and access is granted on a need to know basis. We follow requirements and best practice in retaining copies of these checks, as set out below.

**New staff**

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

- Verify their identity, including sight of birth certificates and any name change documentation.
- 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 from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

› Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, Headteachers, Principals and Deputy/Assistant Headteachers.

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

› responsible, on a regular basis (3 or more times in a month) 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

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

› We believe the individual has engaged in relevant conduct; or

› 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 academy 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 academy.

**Trainee/Student Teachers**

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

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

**Volunteers** We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will seek HR advice and retain a record of this risk assessment.

**Governors**

All trustees, local governors and members 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.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- 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 student 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, in line with the Rochdale alternative provision guidance for school's.

**Adults Who Supervise Students 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 student 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.

**Students Staying with Host Families**

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

## Appendix 3: allegations of abuse made against staff

### Section 1: Allegations That May Meet the Harms Threshold

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 he or she may pose a risk of harm to children, and/or

› behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the academy.

› If we are in any doubt as to whether a concern meets the harm threshold, we will consult out 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 Until the Case Is Resolved

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

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

› redeployment within the academy 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 academy 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.

The case manager will seek advice from the academy's HR support and the LADO 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 fact finding in line with local procedures to obtain key information about the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), after taking HR advice, carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. In addition to discussion with HR, advice will be also sought from the LADO, police and/or children's social care services, as appropriate
- 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 suspension is considered necessary**, agree and record the rationale for this with the LADO and HR. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern and the individual will be given a named support officer at the academy and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO and HR what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO and HR to initiate the appropriate action in the academy and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Advice should be taken from HR in respect of whether referral to Occupational Health or other support services may be beneficial.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing.
- 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. The HR service should support the academy with this requirement.

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

Where the police are involved, wherever possible, the academy 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 academy'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 academy, 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 and HR team 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 academy, while the academy carries out the investigation.
- We will involve the agency fully, but the academy 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.

**Organisations Or Individuals Using School Premises**

Incidents occurring when an individual or organisation uses a school's premises. As with all safeguarding allegations, schools should follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

## Timescales

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

## Specific Actions

**Action Following a Criminal Investigation or Prosecution**

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

**Conclusion Of a Case Where the Allegation Is Substantiated**

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

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

**Individuals Returning to Work After Suspension**

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

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 academy.

**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 academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

### Confidentiality and Information Sharing

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

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

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

### Record-Keeping

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

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 academy 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

› Seek HR advice if unsure what should be disclosed in a reference.

### Learning Lessons

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

### Non-Recent Allegations

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

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

Where an adult makes an allegation to the academy 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

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.
- Disclosure made by a child, parent or other adult within or outside the academy.
- Pre-employment vetting checks.
- Safeguarding concern or allegation from another member of staff.

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 academy 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.
- Using inappropriate or offensive language
- Humiliating students.

### Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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 academy's safeguarding system.

### Responding to low-level concerns

If the concern is raised via a third party, the DSL 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 DSL will use the information collected to categorise the type of behaviour and determine any further action, after taking advice from the Headteacher.

### 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 LADO.

› Retained at least until the individual leaves employment at the academy.

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 LADO 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 4: Specific Safeguarding Issues

### Children missing from education

A child who is absent from or goes missing from education, particularly repeatedly or for prolonged periods, 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, HBVA 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 academy without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. We will seek advice from the LA Children Missing Education Officer, Jane Booth.

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

### Child Sexual Exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others 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. The DSL will seek advice from the multi-agency Complex Safeguarding Team if they are concerned that a child is at risk of sexual exploitation.

### Domestic Abuse

In line with the Domestic Abuse Act 2021, children who live in a household where there is domestic abuse and/or violence that occurs between family members are themselves identified as being victims, due to the serious, long-lasting emotional and psychological impact this can have. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can be coercive and controlling behaviours. 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships. This can include sexual harassment. The Domestic abuse Act covers all children over the age of 16.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

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

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

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

### So-Called 'Honour-Based' Abuse (Including FGM And Forced Marriage)

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

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

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

### FGM

A member of the safeguarding team 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 student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student 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 student 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. The academy should always seek advice from EHASH if they are concerned.

**Forced Marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and contact EHASH
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student

to support services and provision 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. The local authority Equality and Community Cohesion Officer, Muhammad Abdulaleem can assist schools in providing appropriate training.

We will assess the risk of children in our academy 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 students to stay safe online at the academy 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 students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a student 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 student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

### Child-On-Child Abuse

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

Our academy 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.

This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

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

### Sexual Violence and Sexual Harassment Between Children In Schools

Sexual violence and sexual harassment can occur:

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

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

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours, creating a culture where sexism, misogyny and misandry are not tolerated.
- Utilising research and evidence-based practice to support respectful and safe academy culture.
- 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 academy's approach to this type of abuse.

**Serious Youth 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.

Children may carry weapons, including knifes, either because they have been manipulated or forced to do so, or because they feel this will help them to protect themselves. If a child is known or suspected to be carrying a weapon, the DSL must be informed and the Rochdale knife protocol for schools followed.

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

**Private Fostering**

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

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

- children from other countries sent to live in the UK with extended family;
- host families for language schools;
- parental ill-health;
- where parents who have moved away, but the child stays behind, including where families may have had unsuccessful applications to remain in the UK following Brexit;
- teenagers estranged from their families.

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

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

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

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

Further information is available at: Private fostering information from Childrens Act

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being privately fostered, they will report this to the DSL, who will seek advice from the EHASH.

**Checking The Identity and Suitability of Visitors**

All visitors will be required to verify their identity to the satisfaction of staff.

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 in on the touch screen, have their photograph taken and wear a visitors lanyard displaying photograph and name that identifies them as a visitor, distinct from staff ID.

Lanyards are either red or yellow. Red identifies that the visitor is not DBS checked and must be accompanied by a member of staff at all times. Yellow lanyard indicates that the organisation sending the professional has provided prior written confirmation that an appropriate level of DBS check has been carried out.

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

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

**Additional Advice And Support**

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point:

**Abuse**

Supporting practice in tackling child sexual abuse – CSA Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

**Child Exploitation**

Safeguarding children who may have been trafficked

**Information Sharing**

Government information sharing advice Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

**Online Safety Advice**

Childnet - Provides guidance for schools on cyberbullying

**Radicalisation**

Prevent duty guidance Home Office guidance