



Safeguarding and Child Protection Policy 2025-26

Policy applicable to	All stakeholders			
Statutory/Non Statutory	STATUTORY			
Approval required by (please tick):	LGB ✓	Principal	SLT ✓	Other (specify)
Date reviewed	September 2025			
Review frequency	Annual			
Date of next review	September 2026			
Related Documents/ Policies:	DfE KCSIE 2025 and Working together to safeguard young people (2018)			
Member of staff responsible for policy	Jonathan Bell			
Published on Academy/Trust website	Academy website and trust HR site			
Equality Impact Statement: This Policy has been reviewed against equal opportunities legislation with regard to age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity and has no identified adverse impact (direct or indirect) on minority groups				

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Gemma Murphy	Tel: 0161 770 5333 G.murphy@wernethprimary.org.uk
Deputy DSL	Jonathan Bell	Tel: 0161 770 5333 j.bell@wernethprimary.org.uk
Local authority designated officer (LADO)	Colette Morris	Colette Morris Colette.Morris@oldham.gov.uk T: 0161 770 8870 / Mob: 07583 101 863 lscb.group@oldham.gov.uk
Chair of Werneth Primary School LGB	Ashley Travis	
Link Governor for Safeguarding	Rob Logan	
Channel helpline	Angela Quinn	T: 0161 227 3545 angela.quinn@manchester.gov.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Safeguarding Advisor for Education	Stacey Brackenridge	T: 0161 770 8868 stacey.brackenridge@oldham.gov.uk
SW Grid for Learning (HSB helpline)		0345 601 3203

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognizing 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 2025](#) and [Working Together to Safeguard Children \(2024\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following Government guidance and legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [Teaching online safety in schools](#), which is the Government guidance supporting schools to teach pupils how to stay safe online when studying new and existing subjects
- [DfE Information Sharing Advice for Practitioners 2024](#) produced by the DfE outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the "Seven Golden Rules for Sharing Information," which provides a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

3. Definitions

➤1. Definitions

- **Safeguarding and promoting the welfare of young people means:**
- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online ➤ Preventing the impairment of children's mental and physical health or development
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes

Child protection: A part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific young people, who are suffering, or are likely to suffer, significant harm.

A **Child in Need** is defined under the Young people Act 1989 as a child who is unlikely to achieve and maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Children in Care is a child 'looked after' (in care) if they are in the care of the Local Authority for more than defined under the Young people Act 1989 as a child who is unlikely to achieve and maintain a reasonable level of health 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a LA approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a [Kinship Care Strategy](#) to improve kinship carers' financial stability, education, training and partnership with Local Authorities and other agencies. Oldham have also set out their [Kinship offer](#).

These arrangements can be known as either family and friends care or private fostering.

- **Family and Friends Carers:** If you are a grandparent, aunt, uncle, brother, sister or family friend looking after a child who cannot be cared for by their birth parents, you are known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements for Special Guardianship Order.
- **Private Fostering:** You are a private foster carer if you are not a close relative and you are looking after a child who is under 16 (or under 18 if they are disabled) for more than 28 days in a row.

Abuse is a form of maltreatment of a young person, 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 young person'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.

Sharing of nude and semi-nude images and videos (no longer referred to as sexting) is the sharing of sexual imagery (photos or videos) by young people.

Up skirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

Duty of Care: The duty which rests upon the College and every employee, volunteer and contractor to ensure that all reasonable steps are taken to ensure the safety of a child, young person or vulnerable adult in our care. Any person in charge of, or working with young people, young people or vulnerable adults, in any capacity is considered, both legally and morally, to owe them a duty of care.

Vulnerable Adult: A person who may need community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against harm or exploitation.

Children and young people: Those who have not reached their 18th birthday.

Early Help:

Support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse:

4. Equality statement

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

We give special consideration to children who:

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

- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Roles and responsibilities

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

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. A signed record of completion is kept for all staff.

All staff are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputy DSL, the behaviour and anti-bullying policy, our Student Acceptable use of ICT policy, and the safeguarding response to children who go missing from education (Appendix 3)
- The early help process and their role in it, including identifying emerging problems and liaising with the DSL/deputy DSL
- 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 supporting the DSL/deputy DSL
- 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 sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where abuse and neglect have been suffered, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or School and/or can occur between children outside of these environments. (Contextual safeguarding)
- The fact that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL)

Section 13 and appendix 3 of this policy outline in more detail how staff are supported to carry out their role.

5.2 The designated safeguarding lead (DSL)

The DSL is Gemma Murphy. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL or DDSLs (Jonathan Bell, Sarah Chandler, Katy Gregory and Daniel Lunt) will be available during school hours for staff to discuss any safeguarding concerns. Out-of-school hours, the DSL can be contacted via the email (Including Operation Encompass alerts) and phone number on page 2.

The DSL can be contacted out of hours, for non-emergencies, using the following email address:

info@wernethprimary.org.uk

When the DSL is unavailable, Jonathan Bell (Executive Principal) is deputy DSL and will act as the day-to-day DSL.

If the DSL and deputy are not available, Sarah Chandler (Head of School) and Katy Gregory (Assistant Principal and SENCO) and Daniel Lunt (Assistant Principal) will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL is given the time, funding, training, resources and support to:

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

The DSL also keeps the Principal informed of any issues, and liaises with local authority case managers and designated officers for child protection concerns as appropriate.

The DSL is aware that children must have an 'appropriate adult' when speaking with police officers.

The DSL will liaise with other staff within school who are responsible for attendance so that they are aware of the associated risks with children being absent from education for prolonged periods and/or on repeat occasions, as this can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The school will identify those pupils who are persistently absent or those who are missing from education and work with Children's Social Care where the school absence indicates safeguarding concerns. Where there are no safeguarding concerns they will follow the protocol for [educational neglect](#).

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

5.3 The Local governing body (LGB)

The LGB will approve this policy annually to ensure it complies with the law and hold the Principal to account for its implementation.

A Safeguarding lead governor has been appointed to monitor the effectiveness of this policy in conjunction with the LGB.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate.

All governors will read Keeping Children Safe in Education. Please also refer to section 13.

All governors and trustees receive appropriate safeguarding training, including at induction. This training should equip governors with the knowledge and skills to understand their safeguarding responsibilities and contribute to a safe school environment as outlined in Keeping Children Safe in Education 2025. Organisations like the [National Governance Association](#) and The Key for School Governors offer resources and training to support governors in this area.

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers are informed of the systems which support safeguarding, including this policy, as part of their induction
- Be responsible for the safeguarding of pupils attending an alternative provision and should be satisfied that the placement meets the pupil's needs and know where the pupil attending is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.

- Obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform them of any arrangements that may put the child at risk (i.e. staff changes), so that they can ensure that appropriate safeguarding checks have been carried out on new staff.
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

5.5 The appropriate adult (AA)

How the Police conduct themselves when a person is questioned is covered by the Police and Criminal Evidence Act 1984 (PACE) Code C. In paragraph 1.7 the PACE guidance advises that "The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons. It is expected that the AA will support the student to understand what is being said to them allowing them to participate fully in the process. Where this is a member of staff, this will be reported to the DSL and recorded. In some cases, the AA may be a parent/carers.

6. Confidentiality

6.1 The Werneth Primary School has the following principles with regards to sharing information within the School/Pinnacle Learning Trust, our 3 safeguarding partners and other educational providers:

- Timely information sharing is essential to effective safeguarding including for students moving onto School in order to ensure that the post 16 provider and their staff, know who these students are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that students in this group might face and the additional academic support and adjustments that they could make to best support these students.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's 'Information Sharing Advice for Safeguarding Practitioners' includes 7 'golden rules' for sharing information, and will support the DSL/deputy DSL who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12

6.2

Policy on the use of interpreters

Where possible, leaders will use individual academy and/or Pinnacle Learning Trust staff as interpreters for families and/or children because all Pinnacle Learning Trust staff are duty bound to maintain confidentiality; treat pupils and families with dignity and mutual respect; and have proper and professional regard for the ethos, policies and practices of the school in which they teach.

Where an academy needs to use interpreters from outside of the organisation, the people acting as interpreters are expected to maintain confidentiality and demonstrate regard for the need to safeguard pupils' well-being, in accordance with statutory provisions. External interpreters will be asked to read and sign the following statement/the confidentiality statement in Appendix 5

7. Recognising abuse and taking action

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

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

Tell the DSL/deputy DSL immediately. The DSL/deputy DSL will then make a referral to children's social care and/or the police if they believe a child is suffering or likely to suffer from harm, or is in immediate danger.

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
- Type up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Typed accounts should be documented on CPOMS or via email and should be signed and dated.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the **DSL/deputy DSL** who will then involve children's social care as appropriate.

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and document these concerns in the usual way.

7.4 If you have concerns about a child

Figure 1 on page 7 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL/deputy DSL first to agree a course of action.

If in exceptional circumstances the DSL/deputy DSL is not available, **do not delay** and speak to a member of the senior leadership team for advice.

Early help

Early Help Indicators:

School staff should now be alert to any child who:

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.

- Has a parent or carer in custody (previously it was ‘family member in prison’), or is affected by parental offending
- Is frequently missing/goes missing from **education**, and/or has ongoing, unexplainable persistent absences from education

If early help is appropriate, the DSL/deputy DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. All Early Help referrals will be processed through a central referral to the Oldham Multi-Agency Support Hub (MASH).

Referral

If it is appropriate to refer the case to local authority children’s social care or the police, the DSL/deputy DSL will make the referral.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL/deputy DSL must follow up with the local authority if this information is not made available ensuring outcomes are properly recorded.

Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree to the levels for the different types of assessment as part of local arrangements (e.g. Strategy Group meetings). See appendix 4. If the child’s situation does not seem to be improving after the referral, the DSL/deputy DSL must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

All social care referrals will be processed through a central referral to the Oldham Multi-Agency Support Hub (MASH)

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL/deputy is not available, do not delay and speak to a member of the senior leadership team for advice.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which the DSL/deputy DSL and governors can call to raise concerns about extremism with respect to a pupil. An email may also be sent to counter.extremism@education.gov.uk, for emergencies only. Call 999 if:

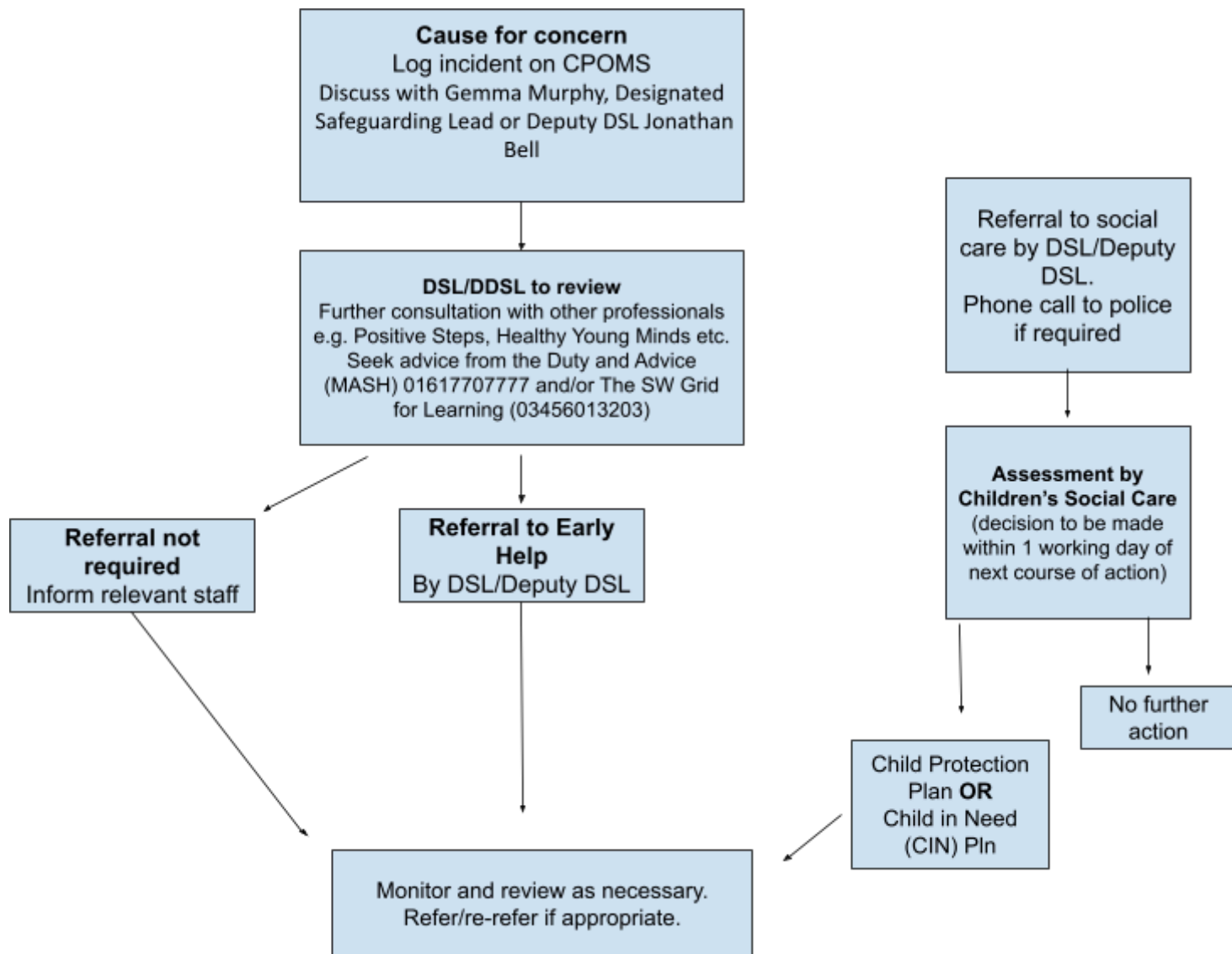
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

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 are alert to the behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, they are advised to 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, staff are advised to speak to the DSL in order to agree a course of action.
- The Werneth Primary School will always refer to the Department for Education guidance on [mental health and behaviour in schools](#) where more guidance is required.

Figure 1: procedure if you have concerns about a child's welfare

(Note – if the DSL/deputy DSL is unavailable, this should not delay action!)



NOTE: If staff have any concerns about a child's welfare they should act on it. They should not assume a colleague or another professional will take action.

7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Principal. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal/chair of governors will then follow the procedures set out in our Complaints Policy, if appropriate.

7.8 Allegations of abuse made against other pupils

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”.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

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

- You must record the allegation and inform the DSL/deputy DSL, but do not investigate it
- The DSL/deputy 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/deputy 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/deputy DSL will contact Healthy Young Minds (formerly CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent (Relationships and sex education RSE 2020)
- Ensuring pupils know they can talk to staff confidentially and can report this via various online systems (VLE/Epraise, CEOP)
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Having a visible presence of staff on duty at break times, lunchtimes and before/after

school

- Having a team of trained Student Ambassadors on duty over lunchtimes

It is clear to all victims that the law on child-on-child abuse is there to protect them, not criminalise them.

7.9 Sharing of nudes and semi-nudes (also known as 'sexting') Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Review of incident

Following a report of an incident, the DSL will determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, School, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

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

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review of incident

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review holding interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good

reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101 and/or reporting this crime online. The log number is to be recorded.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE 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
- Issues of legality
- The risk of damage to people's feelings and reputation Pupils also learn the strategies and skills

needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

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 pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Our reporting systems for pupils include reporting issues confidentially via the Worry Boxes and a list of people that children can talk to is displayed in frequently used locations throughout the school (Eg. The main entrance, lunch hall and areas near toilets, so that children can note the details of who to speak to in school). In person, pupils can report concerns to any member of staff. However, children are likely to speak to their class teacher and/or familiar staff as part of an initial conversation

Pupils are aware of the reporting systems and processes through, for example, discussion in PSHE and Computing lessons, through assemblies and through several different permanent displays around the School

It is important that our pupils feel safe in submitting any concerns as reassurances are always provided to them following any disclosures

8. Online safety and the use of mobile technology

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

issues.

To address this, our school aims to:

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

The 4 key categories of risk:

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

1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
2. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
3. **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
4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- A focus on reinforcing the importance of online safety, including making parents aware of what you ask children to do online (e.g. sites they need to visit or who they'll be interacting with online). This includes information being available on the school website at <https://www.wernethprimary.org.uk/Parents/Online-Safety/>
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Werneth Primary School uses NetSupport, which ensures that:
 - the DSL carries 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 College community.
 - take appropriate action to meet the cybersecurity standards and guidance on generative AI for users in education settings.
- Carry out an annual review of our approach to online safety, supported by a risk assessment that considers and reflects the risks faced by our school community

9. Preventative education

Schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. This is underpinned by:

- Our Behaviour Policy
- Our pastoral support system- including our work with external agencies
- Our planned programme of PHSE delivered weekly, tackling issues such as: healthy relationships; friendships; different families; recognising and valuing diversity; bullying; boundaries; consent; body

confidence and image; stereotyping; and sexual harassment

- Our planned programme of Computing delivered weekly, tackling issues such as: online safety and managing personal information; how to communicate online; cyber security; online relationships (including cyber-bullying); how to stay safe online; and how to evaluate the reliability of online information.
- A range of assemblies and/or enrichment days/weeks/events to promote safeguarding for children. These include Anti-bullying Week, Safer Internet Week and Crucial Crew (for Year 6). These activities will be complemented by further enrichment activities to meet an identified need and/or address an issue that affects children locally and/or nationally.

10. Notifying parents and carers

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

Other staff, such as Phase Leaders or other members of the Senior Leadership Team, will only talk to parents about any such concerns following consultation with the DSL/deputy DSL.

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

In the case of allegations of abuse made against other children, the DSL/deputy DSL will notify the parents of all the children involved.

11. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) and disabilities 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 disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities including specialist work with our special Educational Needs Coordinator (SENCO) and/or other agencies. We also have access to specialist external services for SEN pupils as and when required, including the Oldham QEST (Quality of Education Support Team), Speech and Language Therapist and Educational Psychologist Service.

12. Pupils with a social worker

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

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

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

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

13. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, (Katy Gregory – Assistant Principal/DDSL), 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:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with the virtual school headteacher 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

14. Complaints and concerns about school safeguarding policies

14.1 Low-Level Concerns (see appendices)

So called 'Low level concerns'

Where school has conducted basic enquiries into an allegation and/or concern about a member of staff and established that there is little or no evidence that the allegation/concern has foundation, this will lead to a no further action outcome.

Where this is the case, the case manager (likely to be the Principal and/or Deputy DSL) will discuss this with the Oldham LADO (in line with paragraph 351 of KCSIE, 2021). The Case Manager and the LADO should:

- record the decision and justification for it (Recording this process on CPOMS as an 'Action' linked to the initial allegation/concern raise; and
- agree on what information should be put in writing to the individual concerned and by whom.

Transferable risk

Allegations that may meet the harms threshold can also relate to incidents and/or behaviour that happens outside of school/work. This includes behaviour that may have happened outside of school or School, that might make an individual unsuitable to work with children, this is known as **transferable risk**.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

It is important that policies and procedures make clear to whom allegations should be reported and that this should be done without delay. A "case manager" will lead any investigation. This will be either the headteacher or principal, or, where the headteacher is the subject of an allegation, the chair of governors or chair of the management committee and in an independent school it will be the proprietor.

14.2 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 Complaints Policy).

The School will consider whether any member of staff has behaved or may have behaved in a way that indicates they may not be suitable to work with children. This may include incidents of domestic abuse or other incidents not involving children.

Whilst schools and Schools are not the employer of supply teachers, at The Werneth Primary School we will ensure all allegations are dealt with properly.

For further information, please refer to the PLT Disciplinary Policy.

14.3 Other complaints

Safeguarding-related complaints regarding pupils will be handled by the Principal and/or DSL who will in turn involve any other School staff or external agencies where relevant.

Complaints relating to our premises will be handled by the Principal with the involvement/support of the Pinnacle Trust Estates Team.

14.4 Whistle-blowing

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

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

For information about how the school will respond to such concerns and what protection is available to staff who report another member of staff, please refer to The Werneth Primary School Whistleblowing policy.

15. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and using our online recording system CPOMS.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely on CPOMS 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 7 years after the child has left education. This is typically to the age of 25.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns transfers to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Werneth Primary School shares information with other agencies when this is appropriate, in line with our local safeguarding procedures. Information shared via email is done so using the encryption service EGRESS and via CPOMS for schools that use this system.

In addition:

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

16. Training

16.1 All staff

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

This training will be regularly updated and will:

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

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

Staff also receive regular safeguarding and child protection updates (for example, through emails and staff briefing) as required.

Contractors will also receive a safeguarding information document on arrival to the School.

Volunteers will receive appropriate training, if applicable to their role.

16.2 The DSL and deputy DSL

The DSL/deputy DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through LSCB meetings/email group, Safeguarding and Wellbeing forum groups and keeping up-to-date with the latest safeguarding developments).

They will also undertake Prevent Awareness training.

16.3 Governors

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

16.4 Recruitment – interview panels

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

17. Monitoring arrangements

This policy will be reviewed **annually** by the Senior Leadership Team. After every review, it will be approved by the Local Governing Body (LGB).

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour and Anti-Bullying
- Emotional and Mental Wellbeing

- SEND
- Staff code of conduct
- Complaints
- Health and safety
- Attendance and punctuality
- Student ICT Acceptable use
- Equality Information Statement
- Relationship and Sex education
- Supporting pupils with medical conditions
- Accessibility
- Invacuation/Lockdown
- Educational Visits

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025.

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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

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

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

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

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

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

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

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

We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice as set out below. The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

Safer recruitment- reporting to Governors

Governors and Trustees are aware of the procedures for Safer Recruitment (as outlined in Appendix 2 of the Child Protection and Safeguarding Policy). Governors will *ensure* (wording) that leaders have followed these procedures by discussing and minuting the Safer Recruitment processes either before or after staffing appointments are made. The Safeguarding Link Governor would usually take a lead in this process, but all Governors can seek assurances that Safer Recruitment policy and procedures are implemented.

New staff

When appointing new staff, we will:

- Schools should consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online
- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- 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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

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

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

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

Trainee/student teachers

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

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

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

Governors

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

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

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/Collaborative provision settings

Where we place a pupil with an alternative/Collaborative provision provider, Positive Steps Oldham will liaise with the provider(s) to ensure they have carried out the appropriate safeguarding checks on individuals working there. This information will be shared with The Werneth Primary School.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that the policies and procedures of the provider are shared with the school before the placement begins, to ensure they are in place to protect children from harm.

Appendix 3: specific safeguarding issues

Children missing from education

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

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

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

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

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

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

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Children who witness domestic abuse are also victims.

Witnessing domestic abuse can have a lasting impact on children. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs 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.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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.

If a member of staff suspects CSE, they will discuss this with the DSL/deputy DSL. The DSL/deputy 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.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (e.g. County Lines; see below), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late and
- Children who regularly miss school or education or do not take part in education.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Homelessness

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

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

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

So-called ‘honour-based’ abuse (including FGM and forced marriage)

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating

- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- 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 stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

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

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

If a member of staff suspects that a pupil is being forced into marriage, they will immediately report this to the DSL/deputy DSL.

The DSL/deputy DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

(LADO)

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Serious violent crime

Key indicators that may signal that children are at risk from, or are involved with, serious violent crime include:

- Unexplained gifts or new possessions - these can indicate that children have been approached by or involved with individuals associated with criminal networks or gangs
- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

Sexual violence

It is important that school and School staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

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

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and Schools should be considering when any of this crosses a line into sexual violence - it is

important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats and
 - upskirting

Schools should consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

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

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:

- These children can be targeted by other children
- It's vital schools provide a safe space for these children to speak out and share their concerns with members of staff

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and

7.9 set out more detail about our school's approach to this type of abuse.

Children who have experienced sexual violence can display a wide range of responses, so schools should remain alert to the possible challenges of detecting those signs and show sensitivity to their needs

***Please see Appendix 6 for how to respond to incidents involving sexual related behaviours, sexual violence and sexual harassment.**

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 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 nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Preventing extremism and radicalisation

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL/deputy DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website 'Educate Against Hate' and charity 'NSPCC' say that signs that a pupil is being radicalised can include:

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

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

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

Staff should **always** take action if they are worried.

The Prevent duty

All schools and Schools are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and Schools' wider safeguarding obligations.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or School may be asked to attend the Channel panel to help with this assessment.

An individual's engagement with the programme is entirely voluntary at all stages.

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 School. Visitors should be ready to produce identification.

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

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

Visitors are expected to sign the visitors' book and wear a visitor's lanyard/badge:

- The lanyard will be green for visitors that have issued their DBS and
- The lanyard will be red for visitors that have not issued their DBS

All other staff wear a blue lanyard in the School to differentiate between visitors.

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

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, parents/carers will be contacted immediately and all efforts will be made to contact the child, including through the use of their mobile phone/online social media accounts if possible. When it is deemed reasonable and given an appropriate timescale, the school will contact 101 to report the child as missing from school, obtaining a log/reference number.

Appendix 4: Professional Report for Child Protection Conference

Please note: New Template

NAME (of person presenting the report)	NAME OF ORGANISATION	ROLE WITHIN ORGANISATION
Your email address and office telephone number or mobile number		
Email address:		
Tel number:		

CONFERENCE DETAILS		
Date:	Time:	Venue:

CHILDREN SUBJECT TO CONFERENCE

Name	Gender	Date of Birth	Ethnicity	First Language	Disability	NHS number

GP Details:	
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PREVIOUS CHILD PROTECTION PLANNING		
Local Authority	Dates	Category

ADDRESS HISTORY	
Current Address (Perm/Temp)	
Previous Addresses	

FAMILY NETWORK (to be used to formulate Genogram)					
Name	DOB	Address & Length of time at address	Relationship to child	Previously known to Children's Services? (Y/N)	Significant Person (Y/N)

PLO-LEGAL/COURT ORDERS: (current or previous)	
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Have you contributed to the Danger Statement?	Y/N
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SUMMARY OF PAST HARM

WHAT ARE WE WORRIED ABOUT NOW? (Current Harm)
WHAT IS WORKING WELL? (What is working well now and what has worked well in the past)
COMPLICATING FACTORS (What makes the family's life and parenting experience harder?)

VIEWS OF THE CHILD/REN (What has the child told you about their daily lived experience?)

OBSERVATIONS OF THE CHILD/REN
VIEWS OF THE PARENTS/CARERS/SIGNIFICANT OTHERS



WHAT NEEDS TO HAPPEN? (How can we reduce the worries and risk of harm?)
VIEWS AND RECOMMENDATIONS

Date report completed:	
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Appendix 5- Confidentiality statement for the use of external interpreters

Name of person:

Date:

Academy:

I know that I must treat any information shared by <name of academy> staff, children and/or families as confidential

I will not discuss any information shared by <name of academy> staff, children and/or families outside of the academy (this includes social media)

I understand that I must uphold public trust in the academy and maintain high standards of ethics and behaviour, within and outside <name of school>

I know that I must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions and GDPR.

I know that I must not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs I will ensure that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.

I will ensure proper and professional regard for the ethos, policies and practices of <name of school>.

I have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

Signed:

Date:

Appendix 6

Categorising incidents that are sexual related, sexual violence and/or sexual harassment- Agreed June, 2023

This guidance has been devised in order to provide clarity on how to categorise incidents involving sexual related behaviour, sexual violence and/or sexual harassment.

In order to create consistency in decision making among DSLs, these categorisations will relate to the Brook traffic light system (see link below).

https://proceduresonline.com/trixcms2/media/14391/brook_traffic_light_tool.pdf

When there is an incident involving sexual related behaviour, sexual violence and/or sexual harassment, DSLs should be informed immediately and **recognise that the age of the child will affect whether a behaviour is deemed to be:**

-Green- behaviours that reflect safe and healthy sexual development. They are: displayed between children or young people of similar age or developmental ability reflective of natural curiosity, experimentation, consensual activities and positive choices

- Green behaviours provide opportunities to give positive feedback and additional information
- Where a green behaviour occurs, it is likely to be categorised as 'Sexual related behaviour' but DSLs should discuss this with another DSL trained person (in school or DSL within The Pinnacle Learning Trust) to agree this.
- Most 'green' behaviours will require the DSL to have a discussion with parents/carers to explain what has happened and may involve the parents/carers of other children involved.

-Amber- behaviours that have the potential to be outside of safe and healthy behaviour. They may be: of potential concern due to age, or developmental differences of potential concern due to activity type, frequency, duration or context in which they occur

- Amber behaviours signal the need to take notice and gather information to assess the appropriate action
- Where an amber behaviour occurs, it could be categorised as 'Sexual related behaviour' (Eg. Age 0-5 years- talking about sexual activities seen on TV/online) but may constitute 'Sexual violence' (Eg. Age 9 -13 years physical or cyber/virtual sexual bullying involving sexual aggression)
- DSLs should discuss this with another DSL trained person (in school or DSL within The Pinnacle Learning Trust) and should seek further advice from the Oldham MASH telephone triage service on 0161 770 7777
- **ALL 'amber' behaviours will require the DSL to have a discussion with parents/carers to explain what has happened and may involve the parents/carers of other children involved.**

-Red- behaviours are outside of safe and healthy behaviour. They may be: excessive, secretive, compulsive, coercive, degrading or threatening involving significant age, developmental, or power differences of concern due to the activity type, frequency, duration or the context in which they occur

- Red behaviours indicate a need for immediate intervention and action
- Where a red behaviour occurs, it could be categorised as 'Sexual related behaviour', 'Sexual violence' and/or 'Sexual harassment'. DSLs should use the definitions set out in the Child Protection and Safeguarding Policy to determine what category to use and DSLs should discuss this with another DSL trained person (in school or DSL within The Pinnacle Learning Trust).
- **ALL 'red' behaviours will require the DSL to have a discussion with parents/carers to explain what has happened and may involve the parents/carers of other children involved.**
- Where a 'red' behaviour occurs, it is likely to meet the threshold for Social Services involvement and/or Police involvement. DSLs should seek further advice from the Oldham MASH telephone triage service on 0161 770 7777 to know how to respond to incidents of this type.

***Please note that staff should seek further advice and guidance from the DSLs in their academy to understand how these categories can/should relate to responding to incidents that involve SEND learners as perpetrators. It may be necessary for the DSL to discuss this with the Duty and Advice Team (MASH).**

Appendix 7 The Pinnacle Learning Trust's Procedure for dealing with Safeguarding Allegations against Colleagues (including low- level concerns) Policy

1. Introduction

1.1 The Pinnacle Learning Trust believes that creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold as outlined in Keeping Children Safe in Education) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

1.2 Implemented correctly, this should encourage an open and transparent culture; enable the Trust to identify concerning, problematic or inappropriate behaviour early; and minimise the risk of abuse. A culture of vigilance will help to ensure that adults working in or on behalf of the Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

1.3 Any behaviours that fall short of the guiding principles outlined in the Keeping Children Safe in Education guidance must be shared responsibly and with the right person. All concerns that do not meet the harm threshold must be recorded and dealt with appropriately as a low-level concern.

1.4 Reference to 'child' or 'children' in this document, includes all pupils and students regardless of their age, including those over 18.

1.5 The guidance relates to colleagues who are currently working for the Trust regardless of where the alleged abuse took place or how small the allegation may be. This guidance should be read in conjunction with the Trust's Disciplinary Policy and Procedure and Academy Safeguarding Policy. Where appropriate, allegations against a former colleague will be referred to the police.

2. Policy Statement

2.1 The Trust has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all its children and young people, specifically ensuring it protects those who are suffering or are likely to suffer significant harm. This policy has been developed to address the legal duties set out in: 'Keeping Children Safe in Education, Working Together to Safeguard Children and the 'Childcare Act'.

2.2 If a colleague has a concern (even a low-level concern) that a person may have behaved inappropriately (including another colleague) they should:

- Report this directly to Principal/Safeguarding Lead
- Make a written record of their concerns, observations or the information received
- Maintain confidentiality and guard against publicity while an allegation is being considered or investigated
- Give consideration to the Trust's Whistleblowing Policy where applicable

They should not:

- Keep the concern to themselves, promise confidentiality or attempt to deal with the situation themselves
- Make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or incident
- Discuss the allegation/incident with colleagues other than the Principal/Safeguarding Lead

- Take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim(s) or potential witness(es), or inform the alleged perpetrator or parents/carers

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another colleague
- Disclosure made by a child, parent or other adult within or outside the academy
- Pre-employment vetting checks

2.3 All colleagues and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the academy's Safeguarding practice. They should feel able to raise concerns with the Senior Leadership Team. If staff need further advice regarding a concern about Safeguarding practice, they can also seek support from the NSPCC whistleblowing helpline: 0800 028 0285 or help@nspcc.org.uk.

2.4 Allegations that may meet the harm threshold

The Trust uses the guidance from “[Keeping Children Safe in Education](#)” in respect of all cases in which it is alleged that a colleague (including volunteers, agency staff and contractors) 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.

2.5 If the Trust believes that, or is in any doubt as to whether, a concern meets the harm threshold, the Principal will consult the Local Authority Designated Officer (LADO). Any allegation of abuse will be dealt with quickly, in a fair and consistent way that provides effective child protection, while also supporting the individual who is the subject of the allegation.

The Principal will lead the investigation, or the Chief Executive Officer where the Principal is the subject of the allegation. The procedures for dealing with allegations will be applied with common sense and judgement.

2.6 Procedure for dealing with allegations Initial consideration

Some cases may not meet the harm threshold set out above and in these cases the low-level concerns process will be followed. However, an allegation may be so serious that the low-level concerns process would be inappropriate and, in this case, the Local Authority Designated Officer (LADO) will be informed immediately. They will consult the police and children's social care services as appropriate. This includes allegations against former colleagues.

2.7 Suspension

Where appropriate, careful consideration will be given to whether suspension of the individual is justified or whether alternative arrangements can be put in place, whilst the investigation takes place. Advice should be sought from the LADO, police and/or local authority children's social care services, and HR as appropriate. Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, a Suspension Risk Assessment will be completed, and if there are no other options available and there is no reasonable alternative, suspension will apply.

The Trust counselling details and a named contact who will offer support will be provided and confirmed in writing.

Where it is decided on the conclusion of a case that an individual who has been suspended can return to work, HR/Principal will consider how best to facilitate that. Consideration will also be given to the individual's contact with the child/young person or children/young people who made the allegation.

2.8 Responding to the concern/allegation

In all but the most serious cases referred to above, the Principal, or designated alternative, will respond to any concern by completing a low-level concerns form (Appendix A). Sections 1-4 of the form should be completed with the person who is raising the concern, in order to gather all of the information. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous then that should be respected as far as is reasonably possible.

2.9 As part of the investigation, the Principal should speak to the individual concerned about the concerns that have been raised and will allow them the opportunity to respond. Sections 5-9 of the Low-Level Concerns Form (Appendix A) will be completed. It may be necessary as part of the investigation to speak to any relevant witnesses. Witnesses can give important evidence that might help decide the outcome. Details of any witness statements should also be recorded in section 5 of the Low-Level Concerns Form (Appendix A).

2.10 Once the information has been gathered, the Principal/Safeguarding Lead/HR will need to determine if the concern meets the harm threshold as outlined in Section 1 of Part 4 of the Keeping Children Safe in Education (KCSIE) and outlined above in section 2.4. Where the Principal believes the harm threshold has been met, they must inform the Local Designated Officer (LADO). If in doubt, the Principal should consult the LADO for advice.

2.11 Initial LADO Discussion

The purpose of an initial discussion is for the LADO, Principal and HR to consider the nature, content and context of the allegation and agree on a course of action. The Safeguarding Lead will provide support, if required, at this point to help determine the level of risk in child protection terms. The LADO may ask for relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children/young people.

2.12 There may be situations when Principal/HR will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children/young people or there is evidence of a possible criminal offence. If in doubt the Principal/HR should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

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

- Is inconsistent with the [Trust Code of Conduct](#), including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites

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

2.14 No Further Action

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both HR and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The form as outlined in Appendix A should be finalised. A copy of the letter and the Low-Level Concerns Form will be uploaded to the CPoms Staff Safe software by HR or the Principal as per the below steps:

Login into CPoms Staff Safe.

Click on the left hand tab and choose My Progress.

Click on + Log a confidential note.

Choose the staff member from the drop down box.

Choose the 'notify staff member' (this will be Linda Burrows for HR or the Principal if HR are recording the note), this will alert them to the note which has been created.

Type a brief summary on the 'note text box' and attach the low-level Concerns Form by clicking on the paperclip.

Click the tick in the 'low-level Concerns box'

Click on 'create note' to save and complete the process.

An automatic time and date is produced from the software.

2.15 Strategy Meeting

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion would be convened in accordance with Working Together to Safeguard Children. In a strategy discussion the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim. The LADO will support the Principal and HR making a decision about the next steps.

2.16 Disciplinary Procedure

If the matter requires investigation via the [Trust's Disciplinary Procedure](#), HR in conjunction with the Principal will inform the individual facing the allegation as soon as possible, after consulting the LADO. The investigation and hearing, if relevant, will follow the Trust's Disciplinary Procedure, but will refer back to this procedure throughout the process. The academy will consider carefully whether the circumstances of a case warrant the individual being suspended from contact with children in their role or whether alternative arrangements can be put in place until the allegation or concern is resolved/investigated in line with the Trust's Disciplinary Procedure. All options to avoid suspension will be considered prior to taking that step (see further information on suspension in 2.7).

2.17 The following definitions are used when determining the outcome of an allegation investigation.

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

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

2.18 Confidentiality

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

HR will take advice from the LADO, police and children's social care services and consult with the Principal to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

2.19 Resignations

If the accused colleague resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. Any investigation regarding Safeguarding will be concluded regardless of whether the colleague resigns from their role or not. A referral to the DBS must be made if the criteria is met. It is important that every effort is made to reach a conclusion in all cases of allegations regarding the safety or welfare of children/young people, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it.

2.20 Following a criminal investigation or a prosecution

The police will inform the employer and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances the LADO should discuss with HR/Principal whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

2.21 Referral to the DBS/TRA

If the allegation is substantiated and the individual is dismissed or the academy ceases to use the individual's services, or the individual resigns or otherwise ceases to provide their services, the Principal/HR will seek advice from the LADO as to whether the academy should make a referral to the DBS for consideration of inclusion on the barred lists and, in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

2.22 The academy has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe a colleague has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the individual. A referral should be made as soon as possible after the resignation or removal of the individual.

2.23 In respect of malicious or unsubstantiated allegations

If an allegation is:

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

2.24 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with HR/Principal/Safeguarding Lead to determine whether there are any improvements to be made to the academy's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend an individual, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated.

2.25 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 only be kept for the duration of employment.

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.

Disciplinary Sanctions will be kept for the duration as outlined in the Trust Disciplinary Policy.

2.26 Reporting and Reviewing Trust Statistical Data

Any Low-Level Concern should be reviewed by the Principal at least annually, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Principal should decide on a course of action, which could be managed through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, a referral to the LADO will be made. HR advice should be sought for the correct guidance and process.

Consideration should also be given to whether there are wider cultural issues within the Academy that enabled the behaviour to occur and where appropriate policies should be revised or extra training delivered to minimise the risk of it happening again.

Statistics on safeguarding allegations, including low-level concerns will be shared at the Audit and Risk Committee meetings, along with the result of any disciplinary proceedings. HR will provide the figures for Audit and Risk annually.

Records relating to disciplinaries will be recorded in the HR software, with notes of the sanction, dates and outcomes.

2.27 References

Part three of the Keeping Children Safe in Education guidance outlines that references should include substantiated safeguarding allegations. Low-level concerns must not be included in references unless they

relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. **However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.**

3 RESPONSIBILITIES AND COMPLIANCE

The Trustees are responsible for ensuring that appropriate safeguarding policies and procedures are in place in the Trust. They will monitor the effectiveness of this procedure through annual statistics presented at the Audit and Risk Committee.

The Chief Executive Officer has overall responsibility for maintaining the safeguarding provision across the Trust.

The Chief Operating Officer has responsibility for Safer Recruitment and allegations against staff.

The Academy Principals have overall organisation, control and management within their Academy. They are responsible for ensuring that safeguarding concerns are investigated in accordance with the Academy Safeguarding Policy and these procedures.

The Academy Safeguarding Leads will review the process and guidance annually when updating the Academy Safeguarding Policy and will agree any amendments with the Trust Head of HR. The procedures may be updated at other times when legislation or Trust/Academy practice requires changes to be made.

Appendix A – Low-Level Concerns Form

This document should be used when ‘low-level’ concerns as defined in Section 2 of Part 4 of Keeping Children Safe in Education 2021 are reported. This document does not replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low-level or when formal disciplinary procedures are required in relation to the low-level concern.

1. Name of individual raising the concern Leave blank if concern was raised anonymously or the individual wishes to remain anonymous	
2. Date the concern was raised	
3. Name and role of individual about whom concern has been raised	

4. Details of the concern(s) reported (give description and context) A 'low-level' concern is any concern - no matter how small, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the allegations threshold set out in Section 1 of Part 4.	
5. Details of steps that have been taken to investigate this concern Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. Review the Code of Conduct and Safeguarding Policies to determine if there has been a breach.	
6. Set out the response to the concern	
7. Is this concern 'low- level' or should it be treated as an allegation against staff and managed in accordance with Section 1 of Part 4? To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from the Safeguarding Lead, HR or discuss the matter with the LADO. Set out the reasons for reaching the conclusion, including the advice provided by the advisors and any discussions with the LADO	
8. Have 'low-level' or other concerns been raised about this individual previously? If so, please provide dates, brief details and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold set out in Section 1 of Part 4.	<div style="text-align: right;">Yes</div> <div>[] No []</div>
9. Details of further action required Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.	
Completed by:	Name:
	Position:
Date:	
Signature:	

This record will be uploaded to CPoms Staff Safe. Please note that low-level concerns will be treated in confidence as far as possible, but The Pinnacle Learning Trust may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Records will only be kept for the duration of employment.