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Safeguarding and Child Protection Policy 2024-25



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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Elizabeth Moran	Tel: 0161 6653030 elizabeth.moran@broadfield.oldham.sch.uk
Deputy DSL	Carol Walker	Tel: 0161 6653030 cw@broadfield.oldham.sch.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 Broadfield Primary School LGB	Gina Andrewes	
Link Governor for Safeguarding	Martin Griffin	
Channel helpline	Angela Quinn	T: 0161 227 3545 angela.quinn@manchester.gov.uk
Safeguarding Advisor for Education	David Devane	T: 0161 770 8868 / Mob: 07753715566 david.devane@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 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

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

3. Definitions

Safeguarding and Child Protection is everyone's responsibility. Safeguarding and Child Protection are not the same thing.

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

A **Child in Need** is defined under the Children 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.

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

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

Upskirting 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.

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

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education and will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

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 children missing in education, whose parents/carers has expressed and intention to remove them from school to be home-educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, students, 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 & B 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 (See early help indicators/definition)
- 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, neglect and exploitation, 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, neglect and exploitation 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)
- The fact that children who are (or are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- What to look for to identify children who need help or protection

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 Elizabeth Moran, Principal. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL 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 a personal phone number that is shared with staff.

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

elizabeth.moran@broadfield.oldham.sch.uk or cw@broadfield.oldham.sch.uk

When the DSL is absent, Carol Walker is Deputy DSL and will act as cover.

If the DSL and deputy are not available, Suzanne Despard (Assistant Principal) or Penny Rotton (EYFS lead) 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 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 should receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge.

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
- 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/carer.

6. Confidentiality

6.1 The Broadfield 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 to new school (in-year transfer and/or from Year 6 to a high school) in order to ensure 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
- The basic safeguarding principle is; if a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's social care and the police

6.2 Policy on the use of interpreters

Parents/carers/siblings of other families will not be used as interpreters for matters relating to safeguarding.

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 member of staff 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 staff 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**, home or care

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.

Parents should be informed about a referral which is made about their child unless any of these situations apply, in which case Duty and Advice will make the decision about when and how to inform parents;

-if sexual abuse is suspected

-organised or multiple abuse is suspected

-fabricated or induced illness is suspected

-risk of forced marriage

-contacting the parent will place the child, referrer or others at risk

-the child may be intimidated into changing or preventing them from giving information about the abuse

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:

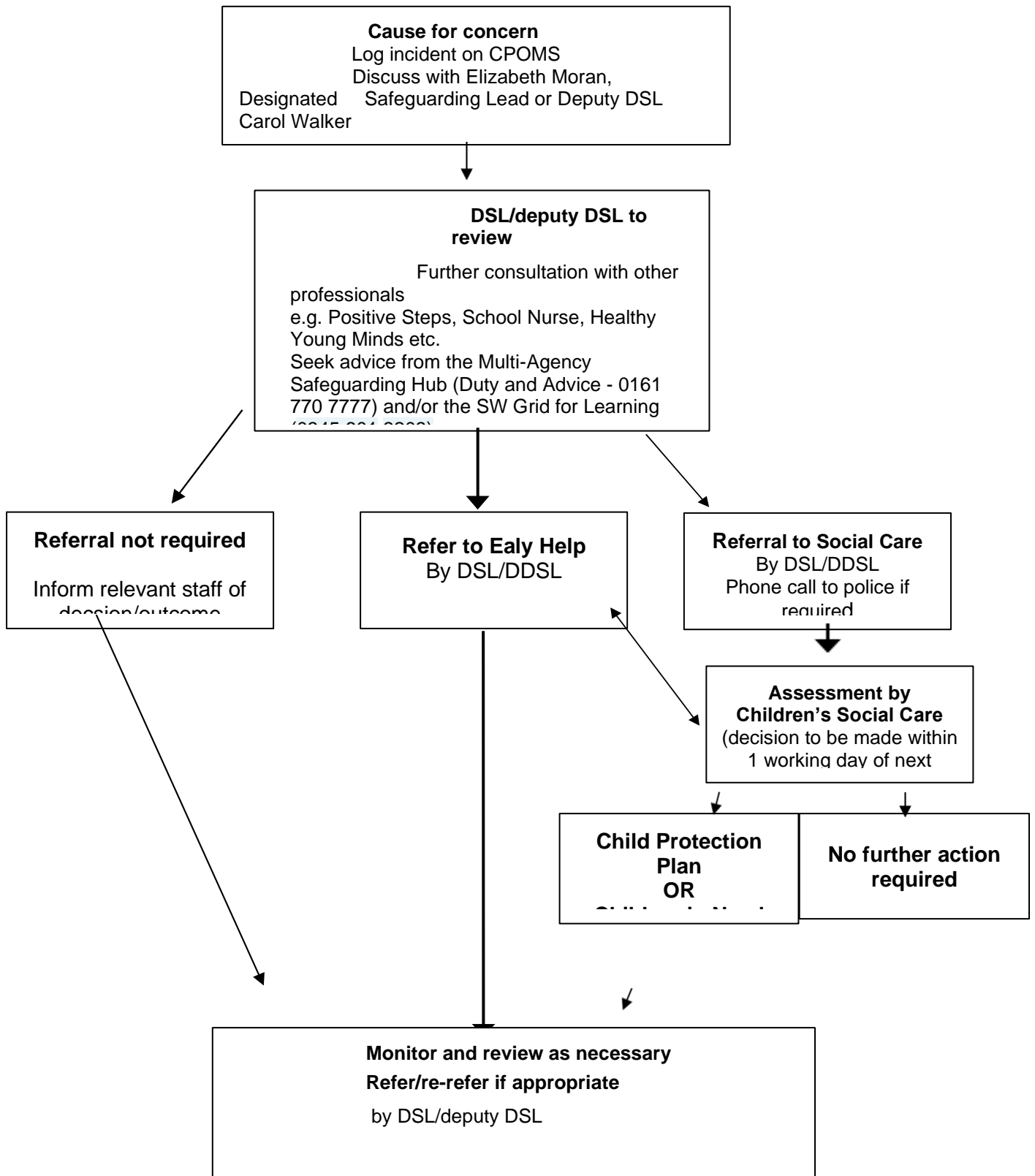
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

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 Broadfield 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 Child Protection Conferences and Core Group Meetings

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

All reports for a child protection conference should be prepared in advance of the meeting and will include information about the child's physical, emotional, intellectual development and wellbeing as well as related issues. This information will be shared with parents. The report should be completed and returned to the safeguarding team prior to the initial or review conference date, as per usual school should indicate whether or not, at this stage, they believe a child protection plan should be in place.

It's very important that the conference chair has a view from school, particularly on occasions when school are not able to send a representative to the conference meeting.

The Oldham LSCB have requested that The Three Houses Tool is completed with the child or young person to capture the child's voice to bring to the child protection conference.

The school representative will almost certainly be asked by the conference chair for this document.

1. It has been agreed as part of any child protection plan or core group plan.
2. A child subject to a child protection plan is about to be permanently excluded.
3. There is an unexplained absence of a pupil who is subject to a child protection plan of more than two days from school.

7.8 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. This incident should also be reported to the LADO by the Principal.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the Local Authority Designated Officer (LADO)

7.9 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
- › Ensure the environment is open and visible so that any potential opportunities for child on child abuse are minimised

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

7.10 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, 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 (sharing inappropriate images) as part of our PSHE education and computing programmes. Teaching covers the following in relation to the sharing of inappropriate images

- › What it is (referred to as inappropriate images)
- › 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.

7.11 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 Place 2 Talk Boxes positioned around school and a list of people that children can talk to is displayed in frequently used locations throughout the 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
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.

- 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](#)
- Broadfield Primary School uses Watchguard as our primary web blocker and Smoothwall as our monitoring system
- Have a Filtering and Monitoring strategy in place, which ensures that robust filtering and monitoring systems exist to limit student's exposure to the 4 key categories of risk (described above) from the school's IT systems.

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 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 and stereotyping.
- 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 and Safer Internet Day. 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.

9.1 Curriculum coverage

Children at Broadfield are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way using the Apple, Zippy and Passport scheme and the carefully planned Relationships and Health Education. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, children with special educational needs or disabilities and children who are looked after or previously looked after.

The programme is fully inclusive and covers the following issues:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem

Children and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect, understanding and empathy for others. There is access to a range of extra-curricular activities, information and materials from a diversity of sources which not only promotes these values but supports the social, spiritual, moral well-being and physical and mental health of the pupils.

Broadfield Primary School takes account of the latest advice and guidance provided to help address specific vulnerabilities and forms of exploitation e.g. CSE, Radicalisation and Extremism, Forced Marriage and FGM.

Healthy Schools

Broadfield Primary School will work with partners to ensure that our curriculum promotes a whole healthy school approach with the aim of:

- Developing a school ethos, culture, spiritual, moral, social and cultural (SMSC) development provision and environment which encourages a healthy lifestyle for all pupils, including the vulnerable;
- Ensuring that food and drink available across the school day reinforce the healthy lifestyle message;
- Providing high quality Physical Education (PE) and sport to promote physical activity;
- Working in partnership with parents/carers, local communities, external agencies and volunteers to support the health and wellbeing of all pupils including the vulnerable.

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, neglect and exploitation 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, pastoral care team 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, (Suzanne Despard – Assistant Principal/DSL), 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

The School will follow the Trust low level concerns process, as outlined in the appendix.

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, advice would be sought 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 principal, or, where the principal is the subject of an allegation, the chair of governors.

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 are not the employer of supply teachers, at Broadfield 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 Broadfield 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. This includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

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 or exploitation 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.

Broadfield 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. Maintaining professional conduct and boundaries

Mobile phones and cameras

Staff are allowed to bring their personal phones/ cameras to school for their own use, but these should remain in their bags or cupboards during contact time with students unless used specifically for educational purposes or for school business.

Broadfield Primary School follows the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Children are not permitted to bring mobile phones into school unless there are exceptional circumstances in which case this must be agreed by the Principal.

Parents and carers are asked to switch off/not to use mobile phones when in the school building and will be asked to leave the setting if they need to use their mobile.

Parents are generally prohibited from taking any photos of children in the school setting but for special events, such as school performances, may do so on the understanding that the images are not posted on social media sites or otherwise shared.

Parental permission is sought when photographs are taken of children linked to the teaching of the curriculum.

Professional Boundaries:

Maintaining appropriate staff/student boundaries and relationships

This section looks briefly at the expectations of staff at the school in relation to appropriate professional boundaries. Adults in positions of authority have a duty to ensure that when working with young people they are aware of their duty to ensure the safety of both themselves and those they work with.

The Teachers' Standards explicitly reference the requirement for teachers to 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school'.

Specifically:

A teacher must maintain good relationships with pupils, exercise appropriate authority, and act decisively when necessary

Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position

The Trust Code of Conduct is also explicit in relation to boundaries. Specifically, the following sections:

Professional boundaries and relationships

Professional conduct and personal integrity

Staff should also be mindful of the above in respect of former students who they have worked with in a professional context. Whilst there may not be a criminal element to any such relationship, this could be considered inappropriate given the previous 'position of trust' factor.

Professional Boundaries – RAISING YOUR AWARENESS

Professional boundaries are breached when a staff member misuses their authority or control in their relationship with a student. Conduct that breaches those boundaries is often easily recognisable. However, there may be some conduct where the boundary breach is less obvious and it is your responsibility to establish and maintain professional boundaries with students.

When interacting with children, think carefully about the implications and potential consequences. For example, where a staff member may become a confidante or counsellor of a student (where it is not part of their role) a relationship is created which can blur the staff–student relationship and the roles are less defined.

Sometimes, children can intentionally or unintentionally cross boundaries with staff, such as in the way they speak or by initiating inappropriate contact, perhaps via social media. In such circumstances it is important for the staff member to remove themselves from any inappropriate contact or conversation. Outside of the workplace a staff member may have to manage a private or professional relationship with a student, such as in extra-curricular activities or as a sports coach. You are always in a position of trust and authority with students and your conduct should remain professional, no matter what the setting.

DO	DON'T
Support students during normal school hours	Share any personal details inc phone numbers, email addresses, home addresses etc.
Communicate with students via Broadfield Primary School official channels only i.e. Classroom,	Join or create any unofficial Broadfield Primary School social media groups with students
Be aware of what is visible to students when making video recordings or streaming live	Arrange to meet with students off site
Give clear instructions at the beginning of each lesson in forming students about the use of video	Open emails that look suspicious
Notify students when you are recording any live stream meetings/ lessons	Join any live conference using personal email accounts
Agree rules with students prior to live streaming in line with Broadfield Primary School Policy	Share confidential student information with non- Broadfield Primary School members of staff
Communicate any behaviour or safeguarding concerns following normal school procedures	Ignore unacceptable behaviour

18. 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).

Checking the identity and suitability of visitors

Entry to school will be controlled by doors that are secured physically. Authorised visitors to the school will be asked to sign the inventory system which logs them in and out of the premises.

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 will be expected to wear lanyards

- 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 at Broadfield to differentiate between visitors

Unidentified visitors will be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near or approaching pupils will be reported to the Police and alert other schools through appropriate systems.

Use of school premises by other organisations

Where services or activities are provided separately by another body, using the school premises, the Governing Body will seek assurances that the body concerned has appropriate policies and procedures in place in regard to safeguarding children.

Serious Case Reviews

Oldham LSCB has a legal requirement to carry out a serious case review (SCR) when a child has been seriously harmed or has died, and abuse or neglect is suspected or known to be a factor in the child's death. The purpose of the SCR is for agencies and for individual agency professionals to improve the way in which they work to safeguard and promote the welfare of children.

The school (via the Senior Designated Person for Child Protection) will make a referral to Oldham LSCB serious case review panel (via the Safeguarding Adviser for Schools) if we have any concerns about a child and believe that the above criteria for a SCR may be met.

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. The school will contact 101 to report the child as missing from school obtaining a log/reference number.

Monitoring arrangements

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

19. Links with other policies

This policy links to the following policies and procedures:

- Behaviour and Anti-Bullying
- Emotional and Mental Wellbeing
- SEND
- E-safety Policy
- RHSE
- Equality Statement
- RHSE
- Staff Code of Conduct
- Complaints
- Health and Safety
- Attendance and punctuality
- Student ICT Acceptable Use
- Accessibility
- Invacuation & Lockdown
- Educational Visits

➤Trust Online Search Protocols

These appendices are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education 2022*.

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

HR Safer Recruitment and DBS Checks

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. Searches will not be carried out on current members of staff, unless they apply for a position within the Trust.

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 assure themselves 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:

- 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).
- Obtain a separate children's barred list check if they will start work in regulated activity before the DBS certificate is available and carry out a risk assessment.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities
- Verify the person's right to work in the UK, including EU nationals. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years after the employment has ceased. We aim to follow the guidance provided on the gov.uk website
- 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 the interview, where possible. 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 young people.

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 Broadfield 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, neglect and exploitation, 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 into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL/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 and the legal age will rise from 16 to 18 from February 2023 after the introduction of the Forced Marriage Act 2023. 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 fmu@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 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.

Sexualised behaviour and sexual related behaviour (the use of sexual name calling, use of sexualised language and swearing, incidents relating to pornography) may be considered sexual harassment and the incident should be investigated by a Designated Safeguarding Lead and/or Senior Leader.

The sharing of nude images is a separate category.

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.

Where there is an incident involving sexual violence, sexual assault, sexual harassment, sexualised behaviour and/or sexual related behaviour, parents/carers will be required to discuss the matter with a Senior Leader and/or DSL. Where possible, these meetings should be held in person and involve the perpetrator so that they can be educated on what is appropriate behaviour.

The parents/carers of the victim must also be informed of the incident and support will be offered, as appropriate, to the victim.

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 radicalisation

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 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 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 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.

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	
----	--

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)	
--	--

Have you contributed to the Danger Statement?	Y/N
--	-----

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:**

Appendix 5: Confidentiality statement for the use of external interpreters

Name of Person:	
Date:	
Academy:	Broadfield Primary School
Statement: <ul style="list-style-type: none">● I know that I must treat any information shared by Broadfield Primary School staff, children and/or families as confidential.● I will not discuss any information shared by Broadfield Primary School staff, children and/or families outside of the academy (this included social media).● I understand that I must uphold public trust in the academy and maintain high standards of ethics and behaviour, within and outside Broadfield Primary 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 Broadfield Primary 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).**

Harmful Sexual Behaviour Protocol

Contents

1. Introduction
2. Definition
3. Specific Principles and Tools
4. AIM 3 and under 12s Model
5. Initial contact – Advice and information Service
6. Assessment
7. Multi-agency Plan and Provision of Services
8. Criminal Justice
9. Educational Settings
10. Governance

Appendices

Appendix A: The Range of Sexual Behaviours/ Clarifying the Degree of Concern

Appendix B: Harmful Sexual Behaviour (HSB) Flowchart

Appendix C: Pathway of Response

Appendix D: Further Information and Resources

1. Introduction

- 1.1 This protocol is for use whenever there is any suspicion, allegation or observation of a child or young person carrying out HSB or being at risk of doing so. It has been refreshed in light of the overarching Strategy and is now jointly overseen by the Youth Justice Service Management Board (YJMB) and the Exploitation sub-group of the Community Safety and Safeguarding Partnership.
- 1.2 Staff from across Children's Services are able to support children and families at a preventative level, where there are concerns about HSB. They can access training and support for this work, via the specialist worker. Where the presenting concerns are deemed to be beyond usual safe and healthy behaviour and there are concerns about harm to others and/or a relevant admission or conviction. As a result, they will be allocated to staff from Children's Social Care (CSC) and the Youth Justice Service (YJS) who have undertaken the required specialist training for joint assessment and any agreed intervention.

2. Definition

Child: anyone who has not yet reached their 18th birthday. 'children' and 'young people' are used throughout this protocol to refer to anyone under the age of 18.

Harmful Sexual Behaviours: For this protocol and among partner agencies, these are defined as sexual behaviours expressed by children, that are developmentally inappropriate, may be harmful towards themselves or others, and/or are abusive towards another child, young person or adult. The definition is deliberately broad, and this protocol encourages an appropriate response at all levels, including prevention, early intervention and a specialist targeted response.

3. Specific Principles and Tools

3.1 This protocol focuses on the needs of the child or young person, who is, or may be causing harm. Separate consideration will be given to the victim's support and safeguarding needs, in accordance with usual safeguarding procedures. This will include calling a separate strategy meeting to address the victim's welfare. Where the victim is aged over 18, safeguarding adult principles and procedures will apply.

3.2 Many children and young people who carry out HSB have themselves been victims of abuse, neglect or other trauma. It is vital to view them as children first, to address their needs in a holistic way, at the earliest opportunity and, in doing so, involve all relevant agencies, in ensuring safety while promoting positive change. They may benefit from a trauma-informed approach to meeting their needs.

3.3 The Hackett continuum can be used by CSC Advise and Duty to inform decision-making about how to proceed with a request for service. Please see Appendix A.

3.4 Specific AIM 3 assessment and intervention with a young person who has admitted carrying out HSB is undertaken by two trained staff, usually from CSC and YJS. These staff will be allocated, on a rota basis in agreement with management across both services who have a lead in regard to HSB.

At the time this protocol was produced, Andrea Worthington andreaworthington@oldham.gov.uk has the Strategic Lead for HSB and AIM within CSC alongside Clare Griffiths claregriffiths@positive-steps.org.uk from Oldham Youth Justice Service.

Operational Leads are:

Rima Zafrin rima.zafrin@oldham.gov.uk – CSC

Claire Rinaldi claire.rinaldi@oldham.gov.uk – CSC

4. AIM 3 and under 12s Model

The AIM 3 Assessment model incorporates new research and practice issues, such as technology assisted sexual behaviours, and a change in practice towards the development of a model that does not determine risk simply as low, medium, or high.

AIM 3 consists of a 25-item assessment framework designed to help practitioners consider relevant targets for intervention, in addition to quantifying risk and levels of supervision. It is not an actuarial risk assessment tool (Leonard and Hackett, 2019)

The framework provides guidance on the relevant information and how to analyse this to develop a profile of the young person, their sexual behaviours, their general functioning, and their context. Through case formulation, the young person's specific needs and risks are identified, leading to more targeted interventions to reduce the likelihood of a repetition of the HSB.

Foregoing the previous risk levels, the scoring of factors as 0, 2 or 4 acts as a guide for the assessor. Each domain has a maximum of 20 points available, with scoring ranging from 0 to 100. Totalling up scores across domains is categorised in a colour-matrix: red scores of 14-20, which may indicate an area of relative need or risk requiring specific or immediate intervention; amber, scores of 6-12, which may indicate the need to lower risk and meet needs requiring intervention in the medium term; green, score of 0-4, which may indicate an area of relative strength in the individual's presentation/context, something which may be utilised to support interventions with the individual. The assessor is to use their professional judgment to reach a final decision about the individual's risk level, with the use of AIM 3 having the potential to act as a guide for risk management, interventions and safety planning (Leonard and Hackett, 2019).

The AIM 3 model allows assessment to be more fluid, capable of being updated and adapted as progress takes place, or significant new stressors or risks are added to the profile. This encompasses a visual graph which represents to children, young people and families, their strengths and needs that have been identified. This will support in identifying the right interventions



AIM3 graph.xlsx

Whilst acknowledging the importance of historical information, AIM 3 looks at the impact of historical factors on the current presentation and functioning of the individual being assessed. This allows for a more dynamic assessment, whereby historical factors are considered for their relevance to the individual at the present time (Leonard and Hackett, 2019) The unique characteristics of victims (e.g. race, gender, learning disabilities) should be considered when using the AIM3 (Leonard and Hackett, 2019).

The AIM 3 model heavily supports utilising knowledge already gathered on a child or young person, who has sexually harmed and using other assessments and analytical work to inform the AIM 3 assessment. The assessment will be informed by Lead professional and all professionals involved in the case. This could be a support worker, education worker, mentor, or anyone else deemed suitable.

The relevance and appropriateness of completing an AIM 3 assessment will be determined by Strategic Heads of Service, Operational Lead's within CSC, YJS and the Criminal Courts.

- The lead agency in the case shall be responsible for undertaking the AIM 3 assessment in the first instance
- Where an AIM 3 assessment is required as part of an out of court disposal (OOCOD) or criminal proceedings, the assessment will be led by a YJS case manager.

- Where it is agreed that a welfare AIM assessment is necessary, the AIM assessment will be led by CSC.
- The lead professional is responsible for completion of the AIM assessment and AIM report within agreed timescales.
- Any issues or barriers to completion, will be reported in the first instance to Operational Leads across CSC and YJS, who will address the issue with the Case workers line manager. If unresolved, this will escalate to Strategic Leads for AIM in CSC and YJS.

Working with young people who sexually harm others, is a fundamental part of work undertaken by CSC and YJS. It is therefore imperative to have a competent and adequately trained staff group across both services to undertake assessments and to intervene appropriately.

A review of trained staff across CSC and YJS will be made annually. This will establish if further training on AIM 3 is required. This will ensure a healthy pool of assessors are available at any given time to complete this work when the need arises and avoid any unnecessary delay in the process.

Heads of Service and Operational Lead Will ensure trained staff across CSC will work closely with the Workforce Learning & Development team on the timing, delivery, and staff attendance, regarding all future AIM 3 and HSB training.

The YJS Head of Service and Operational Lead Manager will ensure training is arranged for staff as often as necessary and will work collaboratively with YJS staff across Greater Manchester to organise this.

5. Initial contact – Advice and information Service

4.1 All agencies

When concerns arise about a child's HSB, Hackett's sexualised behaviour continuum provides examples of presenting sexual behaviours within four age categories. Many factors influence sexual development and so when using the Hackett's sexualised behaviour continuum to categorise behaviour, staff need to consider the familial and wider context including background information and any Adverse Childhood Experiences (ACE's). The tool must be used within the context of the guidance provided here and staff should also draw on other information available. The Lead Professional from CSC and YJS can provide support and consultation in deciding an appropriate level of response.

'Developmentally Typical' behaviours between children or young people of similar age or developmental ability reflect safe and healthy sexual development, influenced by natural curiosity and consensual activities. Parents/carers and/or any agency working with the child can help equip them with the information and skills they need to form healthy and positive sexual relationships.

'Problematic' behaviours are beyond safe and healthy development and may come to attention because of the type of activity or the context. Gathering further information will help to establish any risk to the child displaying harmful sexual behaviour, using the checklist at Appendix A. Discussion with the agency's safeguarding lead will include consideration of a single agency referral, Early Help Assessment or CSC request for service or notification to existing Social/Youth Justice Service Worker.

'Harmful' behaviours cause the greatest concern, sometimes including secretive, compulsive, coercive, degrading or threatening activities and sometimes taking advantage of developmental or power differences. They indicate a need for immediate action, beginning with contacting the parents/carers unless indicated otherwise, and contacting CSC directly on 0161 770 7777 and notifying existing CSC and YJS worker immediately.

4.2 Police

Police will liaise directly with CSC at the earliest opportunity concerning any allegations of HSB by and/or against under 18s, including those not subject to further action. A care plan will be completed by the police for each case where HSB is documented and sent to the child.mash@oldham.gov.uk inbox

4.3 Children's Social Care Duty Assessment and Intervention Team:

Upon receipt of a request for service, duty will check available systems, evaluate thresholds, consider referral history and refer to the Hackett continuum and Appendix A to decide how to proceed. In all cases, where a child or young person has a mental health difficulty, they will discuss the possibility of direct work with the Lead Professional from CSC and YJS. Possible next steps are:

1. No further action – Duty will discuss further support and guidance in signposting the referring agency to assist in addressing the concerns.

2. Early Help - if sexual behaviours are inappropriate/problematic but not abusive, and the Child in Need threshold has not been reached, there is potential for ongoing Early Help support which should include the following:

- Providing support to parents/carers with advice and further information.
- Increased monitoring, supervision and/or support for the child.
- Completing an Early Help Assessment.
- Documentation of the 'voice of the child', in particular how they feel living in the environment
- Consideration given to any difficulties with emotional functioning and additional needs/diagnosis
- Signpost to further resources as outlined in Appendix D
- Safety plan for the child and family

3. Single Assessment where problematic harmful sexual behaviours are present, consult with the Lead Professional from CSC Service and YJS.

4. Strategy meetings – if there is reasonable cause to suspect that that a child has suffered, or is likely to suffer, significant harm. Invite the Lead Professional from CSC and YJS as well as professionals from the police, health, education and any other relevant support agency having contact with the child. If the case is not yet open to the YJS an invitation to a strategy discussion must still be sent to triage@positive-steps.org.uk

During the meeting, consider the vulnerability and safeguarding needs of the alleged perpetrator. Note that separate strategy meetings may be needed for the alleged perpetrator and the victim if under 18.

5. Notify existing team (where the case is already open) for consideration of an AIM 3 Strategy meeting. Invite/consult with the Lead Professional from CSC and YJS.

6. Section 47

The assessor will consider the safeguarding needs of both the alleged perpetrator and other children, particularly in the same household, and whether the child suspected of the HSB can remain in the home safely. Carry out checks with relevant organisations and share information as appropriate to enable them to manage the risks.

6.1 Early Help Assessment

Inappropriate and problematic sexual behaviours (as per Hackett continuum) are often an expression of further underlying problems or vulnerabilities. Consider the need for prevention or early intervention work with the child and their family as appropriate, whether through your own agency, a single agency referral or the Early Help Assessment process. Consent will need to be given. Consider any learning or neurodevelopmental needs such as a diagnosis of Autism and consult with Children with disability team for advice and guidance.

6.2 Single Assessment

When assessing the child's needs, consider them as primarily in need of support and/or safeguarding, with the HSB a part of this overall picture. Remember that lack of parenting concerns does not in itself indicate that there is no role for Social Care.

The assessor will give separate consideration to the needs of both the alleged perpetrator and other children, particularly in the same household. Invite all professionals involved, including education, to a meeting, in line with usual case co-ordination guidelines, to share information and co-ordinate the plan to safeguard children involved. Invite or consult with the HSB Lead for CSC and YJS.

In the assessment of need and the report, the assessor will outline:

- a. The nature and extent of the HSB: Refer to where it features on the Hackett Continuum of Harm and specify any age/developmental differences between alleged perpetrator and victim, emotional distress caused to victim(s) and any coercion or violence used. State the alleged perpetrator's response to the allegations and examine the needs met by the behaviour
- b. The context of the abusive behaviours – where, when and how it was discovered and the reaction of carers
- c. The child/young person's learning needs and any neurodevelopmental needs, such as autism spectrum conditions. Examine the relevance of this for the harmful sexual behaviour
- d. The voice of the child, including how they feel about living in their current environment and/or placement at the time the behaviour was reported
- e. Emotional functioning of the child and the family and how this will be addressed
- f. Mental and physical health needs of the child and family
- g. Any family or wider social factors and exposure to ACE's that have contributed to the HSB
- h. Parent/carers' capacity to adequately supervise the child/young person to prevent further harm. Consideration to be given to the challenge of parent/carers attitude towards the HSB reported. The impact of the harmful sexual behaviour on other family members
- i. Ongoing education and accommodation arrangements in relation to the risk of further harm
- j. Agree with the family a proportionate safety plan or schedule of expectations that sets out who will support and supervise the child/young person alleged to have carried out the harmful sexual behaviour, and what changes need to be made to prevent further harm.
- k. multi agency decision making to be recorded on the child's record

6.3 Referral/Allocation pathway (See Appendix B)

Where abusive and/or violent sexual behaviour (as per the Hackett continuum, see Appendix A) is established to have taken place, use the AIM 3 framework to inform the assessment and plan. Where problematic sexual behaviour (as per the Hackett continuum) has taken place, consider the

need for such an assessment tool, considering the Appendix A checklist, as well as contextual factors. Clearly record an evidenced based decision on proceeding or not with an AIM 3 assessment.

- a. The allocated Team Manager will refer to the HSB Lead for CSC and YJS of any presenting child or young person with indicators of abusive and/or violent behaviours.
- b. Contact the manager of the available trained assessor to discuss allocation to that worker as lead assessor
- c. Discuss appointment of a co-assessor, depending on who is most appropriate in relation to skills base, capacity and existing involvement for the child/young person – e.g., a keyworker, a YJS worker (if the lead assessor is from CSC), and vice versa.
- d. The assessor should ensure they are given access to all relevant records in relation to the child/young person to inform the assessment process.

Desktop AIM completion (please see supporting documents below)

Please note a desktop AIM can be completed in regard to HSB that has progressed criminally or is to be dealt with on a welfare basis. Desktop AIM completion enables support needs to be addressed at the earliest opportunity and intervention to be put in place from a prevention perspective. Previously, AIM assessments would not take place until an admission of guilt or the finalisation of Court proceedings. However, a desk top AIM through the completion of the documentation below ensures that needs are addressed within a timely manner and the child and family are supported, without having to wait for criminal matters to be finalised.

AIM Strategy Meeting Referral Form

Please send completed form to:

Andrea Worthington- andrea.worthington@oldham.gov.uk

Rima Zafrin [-rima.zafrin@oldham.gov.uk](mailto:rima.zafrin@oldham.gov.uk)

Claire Rinaldi – claire.rinaldi@oldham.gov.uk

Nicola Holmes- nicolaholmes@positive-steps.org.uk

Referrer's name:		Role of Referrer:	
Contact Telephone Number (inc Extension + Mobile):		Date:	
Agency:			
Address:			
Name of child/YP :	Home address + phone No or Placement Details	Male or Female	DOB
Any diversity needs for the child/young person:			
YP's/Family's first Language?			
Will an interpreter be required? Yes No			
Other household members/parent's/carers/significant others			
Name	Relationship	Male or Female	DOB





Completion of a desktop AIM assessment is decided through referral into an AIM strategy meeting (see above referral form). After interviews have taken place with the child and family, the scoring and analysis document is completed, and the scores are then implemented onto the graph (both documents are above). The graph can be used to highlight support needs and strengths when communicating with the child and family and also used to demonstrate progress through review.

7. Criminal Justice

7.1 Out of Court Disposal Panel

For those aged 12 years and over who admit to HSB an AIM3 risk assessment may be requested to inform the appropriate course of action. Based on the assessment, the Out of Court Disposal Panel can decide to issue the young person with a

Community Resolution, a Caution with Voluntary Programme, a Youth Conditional Caution or recommend that the young person be charged to Court.

a. The Police Investigating officer will consult with the child if needed and agree to refer the case to the Out of Court Disposal Panel for a decision. The offence must have been admitted by the young person for this to be an option.

b. The YJS will allocate a worker as AIM 3 assessor. CSC may also allocate a Social Worker, depending on whether the case meets the threshold for an AIM assessment, once the Single Assessment or Section 47 Enquiry has been completed and had oversight from a manager. If there is no Social Worker, the CSC Operational Lead will allocate a co-assessor depending on who is most appropriate in relation to need, skills base, capacity and any existing involvement with the young person.

7.2 Referral Order

If a child or young person pleads guilty at Court for a first offence and is sentenced to a Referral Order, an AIM3 assessment should be carried out alongside the Asset Plus assessment, prior to the Referral Order Panel meeting, to inform the report and intervention plan.

7.3 Youth Rehabilitation Order

If the child is appearing in the Crown Court for a first offence, where all sentencing options are available, or is due to appear at the Magistrates Court, for an offence that is not their first offence and they have had a Referral Order previously, the Court is likely to grant an adjournment. The YJS will be tasked in carrying out an Asset Plus assessment and AIM 3 assessment as well as Pre-Sentence Report (PSR) (the findings for all can be included within the PSR, it is not essential for the completion of two separate reports) for a matter involving HSB. The Court should grant a minimum adjournment of 6 weeks, which is the recommended timeframe for completion of an AIM 3 assessment.

7.4 Custodial Sentence

If the young person is sentenced to custody, then all assessments which evidence their vulnerability will be used to inform the assessment of vulnerability which is shared with the custodial setting. YJS and the secure estate should work in partnership to deliver the suggested intervention plan for the child or young person in respect of their HSB

7.5 MAPPA

Under the Criminal Justice Act 2003, Multi-Agency Public Protection Arrangements (MAPPA) protect the public from serious harm by sexual (and violent) offenders. Occasionally, a young person may be referred to MAPPA either as a Registered Sex Offender (Category 1) or as a sex offender sentenced to 12 months or more in custody or to hospital order (Category 2). Most cases will be managed at Level 1 by the YJS, within internal Risk Management Meetings, but where the young person presents a high or very high risk and needs multi agency oversight, they are

managed at Level 2 by a multi-agency partnership including CSC, Police and Health. Exceptionally, where strategic oversight is necessary because of cross-border, media or public interest issues, they are managed at MAPPA Level 3.

7.5 Registration

Under the Sexual Offences Act 2003, young people cautioned or convicted of a sexual offence may be required to register with Police within 3 days (or on transfer from custody). Their details are kept on the Violent and Sex Offender Register (ViSOR) for a period of time depending on the sentence or disposal; time spent on the register is usually reduced by half for children.

7.6 Transition between custody and community

The YJS case manager will call a multi-agency planning meeting well in advance of any such transitions. They will also call a multi-agency planning meeting to ensure robust risk assessment, safety planning and intervention work can be carried out.

7.7 If a young person is found not guilty or their case is discontinued, a further Strategy or multi-agency professionals' meeting should be called to consider any outstanding risk. In this instance, an AIM 3 assessment may still be offered to the young person and their family depending on risk and level of engagement.

8. Educational Settings

8.1 Designated Safeguarding Leads and Head Teachers: Please read this protocol in conjunction with DfE statutory guidance 'Keeping Children Safe in Education 2023 Part 5 'Sexual Violence & Sexual Harassment'. On Sexual violence and sexual harassment between children in schools and colleges, particularly part four, "Responding to reports of sexual violence and sexual harassment" (page 16).

8.2 Ensure you have access to adequate information from other professionals to inform your decision making when you are aware that HSB has taken place.

8.3 When there is a report of sexual violence or sexual harassment the designated safeguarding lead or deputy should complete an immediate written risk and needs assessment. The risk assessment should be recorded and regularly reviewed by school. When assessing risk of further harm caused by a child/young person's sexual behaviour, consider the needs of both the child/young person and any victim, if they are a pupil at the school. Take account of the victim and the victim's parents' views when planning safety and making related decisions. Where appropriate, consider the impact on the victim of being taught in the same lesson as the alleged perpetrator; move the alleged perpetrator to an alternative class or provision when any ongoing emotional distress to the victim is considered possible.

8.4 Where a managed move or exclusion is being considered, discuss this with the multi-agency team to ensure any issues regarding ongoing safety and rehabilitation can be considered, as well as the impact of such a move on the wider plan.

8.5 Consider the potential for bullying toward the alleged perpetrator resulting from other pupils learning of the HSB and take steps to reduce the risk of this where necessary.

Sexual behaviours range from those that are developmentally expected, consensual and exploratory to those that are violent and highly abusive, with many types of behaviours in between. Be as specific as possible when describing the nature of the behaviour under discussion, rather than resorting to overly generalised terms. The following continuum shows the range and definitions within the umbrella term harmful sexual behaviour:

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

(Simon Hackett, 2010 taken from NSPCC Harmful Sexual Behaviours Framework)
<https://learning.nspcc.org.uk/research-resources/harmful-sexual-behaviour-hsb-framework-audit>

Appendix A : Clarifying the degree of concern (Checklist)

When considering how concerned to be about children or young people’s sexual behaviour use the following questions to clarify your concerns.

More positive responses entail greater concern since the harm for both the child carrying out the behaviour and any potential victims is likely to be more significant.

1. Is the behaviour occurring more often than would normally be expected for the developmental stage?
2. Is the behaviour getting in the way of the child’s development? In what ways, and to what degree (be specific)?
3. Did or does the child use coercion, intimidation, or force in the process of carrying out the sexual behaviour?
4. Were or are any of the children involved emotionally distressed by what has happened?
5. Did or does the behaviour occur between children of divergent ages or developmental abilities?
6. Has the behaviour persisted even after intervention from staff or caregivers?

(Questions adapted from Chaffin et al., 2002)

Appendix B: Harmful Sexual Behaviour Flowchart.

Allocation to Assessors

- Clarification with referring agency in respect of the young person and their family's understanding of the referral.
- What to do if the young person is denying the referral behaviour and awaiting trial though remembering AIM 3 is not focused only on the referral behaviour.
- Arrange strategy discussion and invite universal services (police, health, education, YJS, CAMHS etc)

Information

- Identification and allocation to co-worker assessors, consideration of any Individual/diversity characteristics which may impact on the assessment and engagement of the young person and their parent/carer.
- Identifying areas for further clarification/information.

Interviewing

- Contacting all relevant professionals and agencies who have contact/information about the young person, their family.
- Important to gain as much information as possible from the victim perspective, accessing victim statements, ABE interviews. MG5 summary of offence if applicable
- Clarify what the HSB is and in cases is a sexual offence is stated, seek further information beyond the offence wording and undertake pattern mapping.

Analysis/Scoring

- AIM co assessors should plan the interviews with the young person and their parent/carer
- Consider what gaps in information exist which need to be covered in the interview. (Assessment should cover pre-natal to present day experiences)
- Consider any individual characteristics which may impact on the interview such as learning needs, culture, religious, gender, language or physical disabilities
- Complete interviews with young person and their parents/carers. Minimum criteria for interview (1) child and parent/carer 2) child alone 3) parent/carer alone

Safety Planning, Interventions & AIM 3 Report

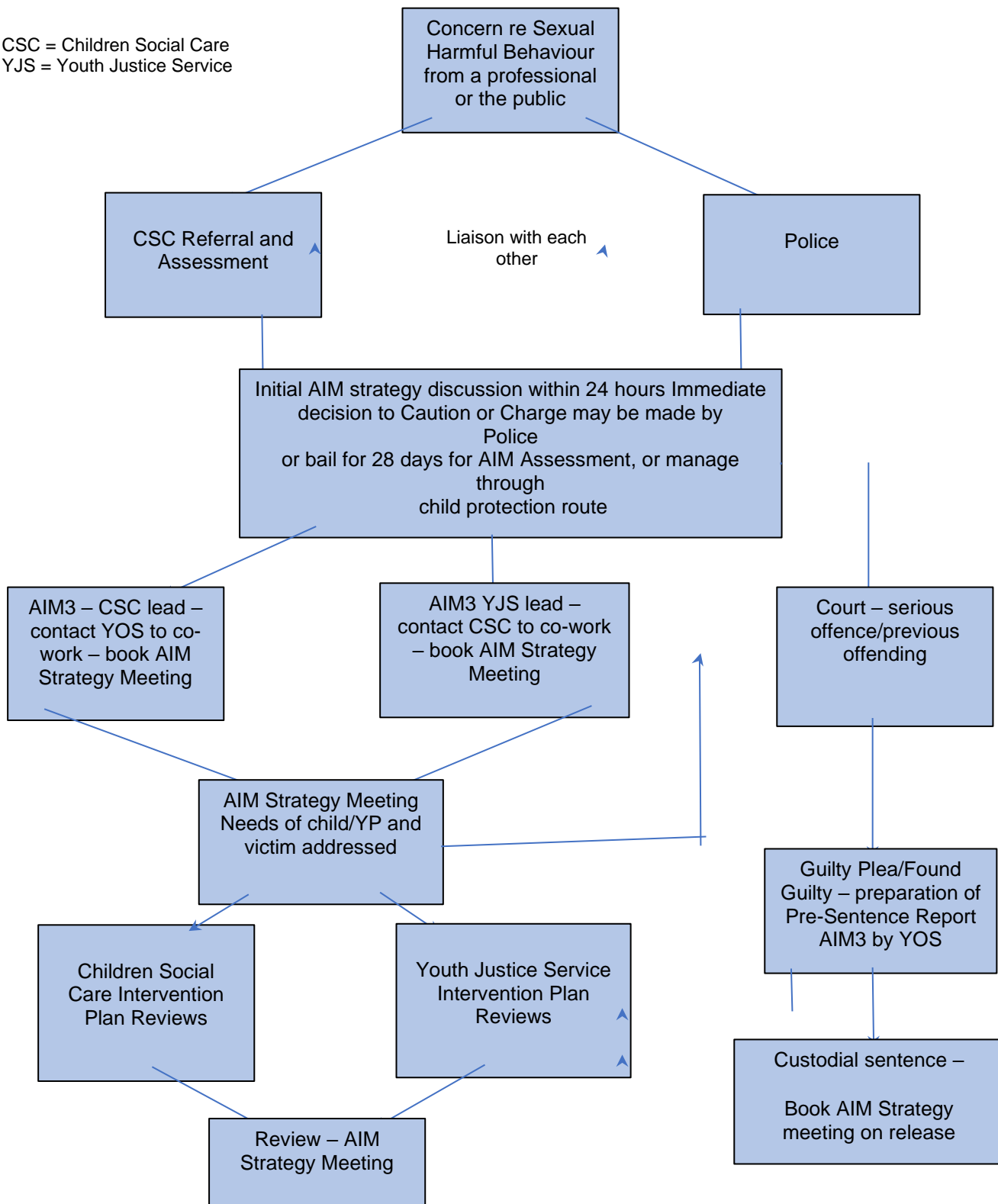
- Review and score the AIM3 Factors following the interviews.
- Complete the AIM 3 scoring, analysis and summary sheet.
- Enter AIM3 scored into Excel spreadsheet for graph profile.
- Review and amend the pattern mapping exercise.
- Analysis of the Domain and Factor scores and the AIM3 graph profile of the young person.

Collate the information and analysis of the AIM3 profile of the child to develop recommendation for intervention, to manage immediate risks, and implement long and short-term safety planning.

The Lead professional (Welfare AIM = CSC, Criminal/OOC AIM = YJS) writes the AIM report and shares the first draft with their co-worker for consideration of amendment/addition. Once agreed, sends to their line manager for gatekeeping and oversight.

Share report with family and all relevant professionals and upload to the

CSC = Children Social Care
 YJS = Youth Justice Service



Appendix D: Further information and resources

To explore further, the following links can be helpful to use or pass on.

a) Advice for Young People

- Think U Know is a good starting point and has good introductory videos Children and young people
- Young people's sexual health services: if you are under 25 contact Ask Brook, www.askbrook.org.uk
- Contraceptive and sexual health information: visit FPA on www.fpa.org.uk

b) Advice for Parents/Carers (see also section d)

- Think U Know is a good starting point and has good introductory videos Think U Know – Parents,
- Parents Protect!: 0808 1000 900 or www.parentsprotect.co.uk
- Helping you understand the sexual development of children under the age of 5 (Parents Protect)
- Helping you understand the sexual development of children aged 5-11 (Parents Protect)
- Healthy bodies guides to puberty and sexual development for parents of CYP with learning disabilities (Vanderbilt)
- Growing up, sex and relationships – a guide for young disabled people and a guide to support parents of young disabled people (Contact)
- Nude selfies – a parents' guide (Think U Know)

c) Sexual behaviour and development

- Brook Traffic Light Tool (Brook)
- Child's play? Preventing abuse among children and young people (Stop it Now!)
- Healthy sexual behaviour (NSPCC)
- Healthy and unhealthy relationships (Childline)
- PANTS sexual harm prevention resources for conversations and work with children (NSPCC)

d) Online safety and pornography resources

- What's the problem? A guide for parents of children and young people who have got in trouble online (Parents Protect)
- Think U Know – Parents, Children and young people, professionals
- Keeping children in care safe online (Think U Know)
- Keeping children safe - Online porn (NSPCC)
- Keeping children safe - Online safety advice for parents (NSPCC)
- Your guide to social networks your kids use (NSPCC)

e) Sexting

- Sexting in schools and colleges: Responding to incidents and safeguarding young people (UK Council for Child Internet Safety 2016)
- Sexting: how to respond to an incident
- Searching, screening and confiscation: Advice for headteachers, school staff and governing bodies
- Keeping children safe - Sexting (NSPCC)

f) NICE Guidance for professionals

- NICE Guidance on harmful sexual behaviour includes recommendations on:
 - multi-agency approach and universal services
 - early help assessment
 - risk assessment for children and young people referred to harmful sexual behaviour services
 - engaging with families and carers before an intervention begins
 - developing and managing a care plan for children and young people displaying harmful sexual behaviour

- developing interventions for children and young people displaying harmful sexual behaviour
- supporting a return to the community for 'accommodated' children and young people

g) Advice and guidance for schools and colleges

Peer on peer abuse

- Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads (DfE, 2017)

h) Child Protection

- The Greater Manchester Safeguarding Partnership (GMSP) are a joint set of procedures agreed by LSCBs in the North west (Section 5.11.3 Harmful Sexual Behaviours Presented by Children and Young People). They include information and guidance on all aspects of safeguarding and child protection based on current legislation, national policy and research, including a section on Harmful Sexual Behaviour
- NSPCC Helpline: 0800 800 5000 (England and Wales) or www.nspcc.org.uk
- Child Exploitation and Online Protection Centre (CEOP): 0870 000 3344 or www.ceop.police.uk
- Stop it Now!: 0808 1000 900 or www.stopitnow.org.uk

i) Multi-agency Public Protection Arrangements

- <https://mappa.justice.gov.uk/connect.ti/MAPPA/groupHome>

- 1 True Relationships & Reproductive Health. (2012) Brook Limited Company is a registered charity
- 2 The AIM Project (Assessment, Intervention, Moving On) is a registered charity and provides training for use of its models and approaches.

Appendix 8: 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 (if concerns are about the Principal this should be reported to the Chief Executive Officer, and concerns about the Chief Executive Officer should be raised with the Chair of the Trust Board)
- 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.

<p>1. Name of individual raising the concern</p> <p>Leave blank if concern was raised anonymously or the individual wishes to remain anonymous</p>	
<p>2. Date the concern was raised</p>	
<p>3. Name and role of individual about whom concern has been raised</p>	
<p>4. Details of the concern(s) reported (give description and context)</p> <p>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</p>	

<p>not meet the allegations threshold set out in Section 1 of Part 4.</p>	
<p>5. Details of steps that have been taken to investigate this concern</p> <p>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.</p>	
<p>6. Set out the response to the concern</p>	
<p>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?</p> <p>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</p>	
<p>8. Have ‘low-level’ or other concerns been raised about this individual previously?</p> <p>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.</p>	<p>Yes [] No []</p>
<p>9. Details of further action required</p> <p>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.</p>	

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.

Safeguarding and Health and Safety Information for Visitors, Contractors and Stakeholders

Welcome to Broadfield Primary School

At our school we are committed to ensuring that all our pupils achieve their full potential and become lifelong learners. Our enthusiastic and dedicated staff provide a well planned and challenging education of a high standard. We celebrate diversity and teach children to recognise and respect people's differences as well as similarities

Together we can achieve"

This booklet is designed to help you best serve the needs of our pupils and to ensure you have a safe visit to Broadfield.

Safeguarding

Broadfield Primary School is committed to safeguarding and promoting the welfare of pupils and expects all staff, volunteers, contractors and visitors to share this commitment.

All visitors must make themselves familiar with the latest version of 'Keeping Children in Safe in Education Part 1'. This document is available on request from the office.

We will endeavour to safeguard children by:

- Valuing them, listening to and respecting them
- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- Recruiting staff and volunteers safely ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately

We recognise that some children may be victims of neglect, physical, sexual or emotional abuse – and all our staff are well placed to identify such abuse and offer support to children in need.

Rules of confidentiality mean that it may not always be possible or appropriate to feedback to staff who report concerns to them.

We recognise that all matters relating to child protection are confidential. The Headteacher or Designated Person will disclose personal information about a pupil to other members of staff on a 'need to know' basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being, or that of any other.

If you have a concern that a child is being harmed or is at risk of harm or if you receive a disclosure (intentionally or unintentionally) you must contact the Designated Safeguarding Lead (The Headteacher).

If you have any concerns or worries, please tell one of the following members of staff immediately.

- **Senior Designated Person for Child Protection (Headteacher) – Elizabeth Moran (0161 665 3030)**
- **Deputy Designated Person for Child Protection (Deputy Headteacher) – C Walker (0161 665 3030)**
- **Nominated Governor for Child Protection – M Griffin (c/o school 0161 665 3030)**

Useful Numbers if the above members of staff are not available

- **Multi agency Safeguarding Hub (MASH) Work Hours 9-5pm – 0161 770 7777**
- **Emergency Duty Team (Out of Hours) 0161 770 6936**
- **Police uniformed 101**
- **Forced Marriage Unit 020 7008 0151**
- **Local Authority Designated Office (LADO) 0161 770 8870**
- **CEOP website ceop.police.uk**
- **Prevent Officer (David Bull)-770 4196**

Broadfield Code of Conduct

All staff, volunteers, contractors and visitors are expected to adhere to a code of conduct in respect of their contact with pupils and their families.

Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the behaviour policy.

Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation.

Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE and LA guidance.

Except in cases of emergency, first aid will only be administered by qualified First Aiders. Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. For example, the door to the room in which 1:1 coaching is taking place should be left open or the teacher should ensure that they and the child are clearly visible e.g. the use of the conservatory.

All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

Home visits to pupils (which should be undertaken with another member of staff) or private tuition of pupils should only take place with the knowledge and approval of the Headteacher.

Staff supervising off-site activities or school journeys will be provided with a school mobile telephone as a point of

contact for parents and/or parents will be contacted by school.

Staff should only use the school's digital technology resources and systems for professional purposes. Staff will only use the approved school email or other school approved communication systems to communicate with pupils or parent/carers and only communicate with them on appropriate school business. Staff will not disclose their personal telephone numbers and email addresses to pupils or parent/carers.

Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

Personal mobile phones should not be in the classroom and mobile phones with cameras should not be in areas where children are vulnerable to any invasion of their privacy.

Health and Safety

It is the legal duty of all employees to ensure that they do not endanger themselves or anyone who may be affected by their work activities, and to co-operate with their employer and Broadfield Primary School in meeting statutory requirements.

Our full Health and Safety Policy is available on the school website or by request. We would encourage you to be familiar with it, especially as a regular visitor to Broadfield.

All staff, volunteers, contractors and visitors must conform and work to the requirements of all current safety legislation and codes of practice.

On arrival at Broadfield, all visitors and contractors must sign in on the electronic screen. You will then be issued with a pass which must be worn visibly throughout the duration of your visit. On leaving the building you should return the pass and sign out electronically.

All contractors must have completed a Permit to Work in advance with the School Business Manager before any works may commence. Contractors are asked to review the School Asbestos Register before commencement of any works.

Emergency Evacuation

If you discover a fire:

- Break the glass of the nearest alarm call point.
- Lead and assist pupils to leave the building
- Leave the premises by the nearest available exit, closing all windows and doors.
- Report fire by calling 999 from your mobile phone or dial (9) 999 if using a landline.

If you hear the alarm:

- If away from your normal place of work DO NOT return to your work area.
- Lead and assist pupils to leave the building.
- Leave the premises by the nearest available exit, closing all windows and doors.
- Report fire by calling 999 from your mobile phone or dial (9) 999 if using a landline.

Broadfield School Assembly Point is at the rear of the building on the bottom left hand playground. All visitors should report to a member of the office staff.

Do not re-enter the building until instructed to do so by a fire service officer or the Headteacher.

First Aid

Broadfield has a number of trained first aiders who are able to deal with most minor injuries and medical conditions.

These are listed at various points around school. All accidents / injuries will be recorded on the relevant first aid slip or accident form. Please report to the school reception if you need any assistance during your visit.

All accidents at Broadfield must be reported to the School Business Manager, including 'near miss' incidents.

Vehicles

Broadfield Primary will not accept responsibility for the safety and security of your vehicle whilst on the premises. Please ensure that you drive slowly within the school car park and that you do not block in any other cars.

Smoking

Broadfield Primary operates a non-smoking policy at all times, this includes school premises and grounds.

If you require any further information

Please contact Diane Brown School Business Manager 0161 665 3030

I have read and understood Broadfield's safeguarding and health & safety information and agree to work within the expectations outlined in their policies and procedures.

Name: _____ Signature: _____

Date: _____