Child Protection and Safeguarding Policy

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Policy statement and principles

We recognise that all adults, including temporary staff, volunteers, the Trust Board and The Local Advisory Committee have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

Everyone who comes into contact with children and their families has a role to play in safeguarding and promoting the welfare of children. Schools and college staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. The Trust adheres to the principle of a "child centred approach" where there is a "clear understanding of the needs and views of children." This policy is one of a series in the Trust's integrated safeguarding portfolio.

All staff believe that The Oak Trust should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. This policy is available on the schools' websites.

Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the Trust's responsibility to safeguard and promote the welfare of children is of paramount importance
- 'Children' includes everyone under the age of 18
- safer children make more successful learners
- representatives of the whole-school community of pupils, parents(see terminology on Page 6), staff, the Local Advisory Committee and the Trust Board will be involved in policy development and review
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers, the Local Advisory Committee and the Trust Board and are consistent with those of Oldham Safeguarding Children's Partnership (OSCP).

Policy principles

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- All staff will reassure children that their concerns and disclosures will be taken seriously

and that they will be supported and kept safe
- Pupils and staff involved in child protection issues will receive appropriate support
- Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.

Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the Trust's commitment with regard to child protection to pupils, parents/carers and other partners
- To work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child
- To contribute to broader, multi-agency strategic discussions about safeguarding children

Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the Trust, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the designated safeguarding lead at each school within the Trust.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Education Act 2002
- The Education Regulations 2016
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2023
- Keeping Children Safe in Education 2024
- What to do if you're worried a child is being abused 2015
- The Domestic Abuse Act 2021
- PACE Code C2019
- Guidance for safer working practice for those working with children and young people in educational settings 2022
- Prevent Duty guidance: Guidance for specified authorities in England and Wales 2023

Roles and responsibilities

The Local Advisory Committee (Governing Body) of each Academy will implement the Academy's Policy on Safeguarding and Child Protection and appoint a named Designated Safeguarding Lead (DSL). It is good practice to have a Safeguarding team. The DSL will ensure that all processes and policies are adhered to. The Local Advisory Committee will also pay due regard to the relevance of the Oldham Safeguarding Children's Partnership within the local authority and act in accordance with the local context. Any breaches of the policy, and all reportable incidents will be immediately reported to the Chief Executive Officer of the Trust. The Headteacher Reports form part of the Local Advisory Committee agenda and will always have Safeguarding as a standing item.

Each Local Advisory Committee will ensure that:

I. The Academy's Policy is understood and implemented by employees of the Trust and others working for the Academy;

II. Appropriate, regular updates and training are available to all staff in line with current requirements;

III. All staff and volunteers working within their Academy will complete relevant Safeguarding training and will confirm they have **read, understood and will adhere** to the Academy's Safeguarding and Child Protection Policy and most up to date document 'Keeping Children Safe in Education'. This record is to be maintained on site to ensure any new staff sign as appropriate;

IV. All staff take responsibility for Safeguarding and follow all processes for Safeguarding children;

V. All new employees at the Academy will receive appropriate Safeguarding induction and training;

VI. All updates to 'Keeping Children Safe in Education' are made available to Local Advisory Committee members and staff and that any changes are immediately

reflected in the Academy's documentation and processes and;

VII. The Single Central Record is monitored every term by the Local Advisory Committee and annually by the Trust.

All staff members should be aware of systems within the Trust which support safeguarding. This includes:

- The Child Protection and Safeguarding Policy
- The Code of Conduct for Employees in School

The Designated Safeguarding Lead (DSL):

- takes lead responsibility for safeguarding and child protection (including online safety) in school
- has the status and authority within the school to carry out the duties of the post, which include:

  - ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publicly available
  - advising and supporting staff on child protection and safeguarding matters
  - encouraging a culture of listening to children
  - managing safeguarding referrals to children's social care, the police, or other agencies
  - keeping detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions (including where referrals were or were not made)
  - liaising with the headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for children to have an appropriate adult in relevant circumstances
  - taking part in strategy discussions and inter-agency meetings
  - liaising with the "case manager" and the designated officer(s) at the local authority where allegations are made against staff
  - making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
  - transferring the child protection file to a child's new school
  - undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

The Deputy Designated Safeguarding Lead(s):

Is/are trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the Deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume the functions above.

The Safeguarding Local Advisory Committee Member (LAC)/Trustee
The role of the safeguarding LAC/Trustee is to provide support and challenge to the DSL and the leadership of each school on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- understanding the requirements of the Keeping Children Safe in Education 2024
- supporting and challenging the DSL on the standards of safeguarding in each school
- confirming that consistent and compliant safeguarding practice takes place across each school
- reporting to the board of trustees about the standard of safeguarding across the Trust

Good practice guidelines and staff code of conduct

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the Trust's child protection policy, the code of conduct for employees and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care

Abuse of position of trust

Staff within the Trust are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

The Trust's Code of Conduct for Employees in School sets out our expectations of staff and is provided to all staff on the 'Every' System.

Children who may be particularly vulnerable

Some children may have an increased risk of abuse, neglect and exploitation Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social

exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced married or being drawn into extremism
- experience or have experienced bereavement or mental health difficulties
- are in care or privately fostered, or have returned home to their family from care
- have experienced multiple suspensions and are at risk of, or have been, permanently excluded

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children is appropriately safeguarded.

Children who are absent from education

Attendance, absence and exclusions are closely monitored. A child being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and a child with unexplainable and/or persistent absences from education can be an indicator of abuse, neglect and exploitation, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor attendance, unauthorised

absence and exclusions and take appropriate action including notifying the local authority, particularly where children are absent or go missing on repeated occasions, on an increasing basis and/or are missing for periods during the school day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy who will alert other relevant agencies as necessary.

As per the government aspiration to have a Senior Mental Health Lead in each school by 2025, schools in the Oak Trust are engaging with training to ensure the staff in their schools are equipped with the skills to support young people's mental health.

Alternative Provision

Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

Children who are lesbian, gay, bi or trans (LGBT)

The fact that a child or young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT, or are perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

The 2024 Cass review of gender identity services for children and young people identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs.

When supporting a gender questioning child, as recommended by statutory guidance, we take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Whistle blowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Trust's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. Complaints about any of the Headteachers within the Trust should be reported to the Chief Executive Officer.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors or volunteers, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education (DfE, 2024)* and in the school's safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers policy and procedures.

Safeguarding concerns or allegations made about staff who no longer work at the school, or historical allegations will be reported to the police with advise from the LADO.

Low-level concerns

The procedure for dealing with low-level concerns raised in relation to teachers, any other members of staff, including agency staff, contractors or volunteers depends on the situation and circumstances surrounding the concern.

The Oak Trust promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the schools (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This is designed to:

- promote and maintain a culture of openness, trust and transparency where staff are clear about the behaviours expected of themselves and their colleagues
- ensure staff feel comfortable to raise low-level concerns; and
- provide for efficient and proportionate handling of those concerns when raised.

Recognising low-level concerns

Low-level concerns are defined as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the schools within the Trust may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
  humiliating children.

The importance of sharing low-level concerns

For our culture of openness, trust and transparency to prevail, all staff should share any low-level concerns they have. Serious case reviews and safeguarding practice reviews have all too often evidenced how low-level concerns felt and/or expressed by staff relating to individuals who were later found to have sexually abused children at a school were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.

To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.

How to share low-level concerns

All staff are encouraged to report low-level safeguarding concerns regarding colleagues so that the identified behaviours can be investigated and managed appropriately. The welfare of the child is paramount and so staff must report their concerns immediately.

All low-level concerns in relation to staff, supply staff, contractors and volunteers should be reported immediately to the Headteacher. Concerns about the Headteacher should be reported to the CEO of the Oak Trust.

Responding to low-level concerns

The Headteacher or CEO of the Oak Trust will review the concern to confirm that it is not a more serious issue that should be dealt with. If necessary, the Headteacher or CEO of the Oak Trust will discuss the concern with the LADO.

The Headteacher or the CEO of the Oak Trust will discuss the concern with the individual who raised it and will investigate it as appropriate. The Employee will be given the opportunity to be represented by a Trade Union representative or work-based colleague if requested.

Most low-level concerns will be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the Trust's Code of Conduct Policy.
If the concern has been raised via a third party, the Headteacher will collect as much evidence as possible by speaking directly to the person who raised the concern (unless it has been raised anonymously), to the individual involved and any witnesses.

Where a low-level concern is raised about a member of supply staff or a contractor, the concern will be shared with the supply agency so they can take appropriate steps in accordance with their own policies and statutory guidance.

Recording low-level concerns

All low-level concerns will be recorded in writing and will include details of the concern, the context and action taken. (See Low-Level Concern Record - Appendix 4). The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records of low-level concerns will be reviewed each term with the CEO and the Safeguarding Lead of the Oak Trust so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If such patterns are identified, the Trust/school will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the harms threshold.

The record of the low-level concern will be kept at least until the person leaves the school.

References

Low-level safeguarding concerns will not be included in references except where they have met the threshold for referral to the LADO and found to be substantiated, in which case they should be referred to in a reference.

Staff and Local Advisory Committee/Trustee Training

All staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern.

New staff receive a briefing during their induction, which includes the school's Child Protection Policy and Staff Code of Conduct , reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Headteacher (unless the Headteacher is the DSL) and Local Advisory Committee Members and Trustees will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via

email, e-bulletins, website access and staff meetings throughout the year.

The Local Advisory Committee/Trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring)) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

The safeguarding LAC representative/Trustee receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high- quality safeguarding across the Trust.

Safer recruitment

The Trust complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the OSCP by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The Trust's Recruitment and Selection Policy and Guidance set out the process in full and can be found on the schools' websites.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years settings and/or before or after school care for children under 8) are made aware of the disqualification from childcare legislation and their obligations to disclose relevant information to the schools.

The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the Trust have been appropriately checked, and are suitable to work with children.

Trainee teachers will be checked either by the Trust or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The Trust maintains a single central record of all required checks on staff and visitors.

Volunteers

Volunteers, including local advisory committee members will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

Site security

Visitors to the schools within the Trust, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents/carers who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the Trust's safeguarding and health and safety regulations. The headteacher of each school within the Trust will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our sites on behalf of the Trust we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place. (See Educational Visits Policy).

Staff/pupil online relationships

The Trust provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation. Full details can be found in the e-Safety Guidance and Code of Conduct for Employees in School.

Child protection procedures

Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2024) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed in the Standards and Expectations Policy.

Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern on CPOMS
- seek support for yourself if you are distressed

If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the safeguarding team.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the safeguarding team. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupils staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next and give them an opportunity to ask questions about what will happen next
- report verbally to the safeguarding team even if the child has promised to do it by themselves
- record the disclosure/conversation on CPOMS
- seek support if they feel distressed
- let the pupil know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time.

Notifying parents

The schools within the Trust will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the safeguarding team will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL and/or the safeguarding team, (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Following several cases where senior leaders in school had failed to act upon concerns by staff, *Keeping Children Safe in Education (2024)* emphasises that **any** member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with our Data Retention Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and

- the information to be shared is relevant, adequate and accurate

Information sharing decisions will be recorded, whether or not the decision is taken to share.

CPOMS and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The safeguarding team will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Designated Safeguarding Lead and the Data Protection officer.

The GDPR and The Data Protection Act 2018 do not prevent staff within the Trust from sharing information with relevant agencies, where that information may help to protect a child. Information on what data we collect and who we share this with is available in our Privacy Notices and Data Protection Policy which can be found on the schools' websites.

Referral to children's social care

The DSL or a member of the Safeguarding team will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Headteacher and the Chair of the Local Advisory Committee are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

Child on child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Trust's anti-bullying procedures where necessary.

However, all staff recognise that children can abuse other children and young people and should be clear about the Trust's policy and procedures regarding child on child abuse. Staff will maintain an attitude of 'it could happen here'. All child on child abuse is unacceptable and will be taken seriously.

Child on child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling
- **bullying** including cyber bullying, prejudice – based and discriminatory bullying
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape
- **causing someone to engage in sexual activity without consent,** such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)** including pressuring another person to send sexual imagery or video content
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- **Upskirting** – this 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. <u>This is a criminal offence.</u>

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Tolerance of such behaviour can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, all staff recognise that it is more likely that girls will be victims of child on child abuse and boys are more likely to be the perpetrators.

Staff recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place but simply not being reported.

Minimising risk

Within the Trust, we take the following steps to minimise or prevent the risk of child on child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- The Personal Development Programme (PDP)/Personal, Social, Health and Economic (PHSE) is used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease.
- We will ensure that the schools within the Trust are well supervised, especially in areas where children might be vulnerable.

Managing allegations of child on child abuse – see Appendix 3

All allegations of child on child abuse should be passed to the safeguarding team immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care**.** The safeguarding team will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the Trust will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the Trust believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Record –** all concerns, discussions and decisions made and the reason for these decisions will be recorded on CPOMS. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of the action taken, decisions reached and the outcome.

Children can report allegations or concerns of child on child abuse to any staff member and that staff member will pass on the allegation to the Safeguarding team. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse:

All schools in the Trust have their own ways that students are confident in using of reporting child on child abuse to relevant staff. As we are a Trust with students of different ages, this is done in ways that are personal to the school and that have been agreed with the school community to ensure they are effective and age appropriate. For example, our primary schools' students will report this via a worry box system, or directly to their class teacher or

Teaching Assistant, whilst at our secondary school this may be via the pastoral teams or during a mental health drop-in session.

Where allegations of sexual violence or sexual harassment are made, the Trust will act in accordance with the guidance set out in Keeping Children Safe in Education *(2024).*

Supporting those involved

The staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the pupils who have been harmed will depend on their circumstances and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

Serious Violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

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

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim needs or wants, and/or for the

financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

The Trust includes the risks of criminal exploitation and sexual exploitation in the Personal Development Programme and RSE curriculum/Personal, Social, Health and Economic (PHSE). A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

Child sexual exploitation

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

Child criminal exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pick-pocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional wellbeing
- misuse drugs or alcohol
- go missing for periods of time or regularly return home late
- regularly or increasingly 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 around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs/money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out under CCE, above.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home

- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing

Online safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils. Our filtering and monitoring systems are reviewed regularly (at least annually) to ensure their effectiveness.

We tell parents what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

We have also ensured that appropriate level of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas or risk:

- **content** – being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **contact** – being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **conduct** – personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **commerce** – risks such as online gambling, inappropriate advertising, phishing or financial scams

All staff are aware of these risk areas and should report any concerns to the DSL.

Sharing nudes and semi-nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL and/or a member of the Safeguarding team will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences or sharing nudes and semi-nudes in December 2020 – UKCIS advice 2020. The Trust will have regard to this advice when managing these issues.

Domestic Abuse

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

Domestic 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. It includes people who have been married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, economic and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside the home. This means children can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the Police will inform the DSL via Operation Encompass. This ensures that the school has up to date safeguarding information about the child.

All staff are aware if the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL and/or a member of the Safeguarding team.

Honour-Based Abuse

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when decided what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act

2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

Teachers must personally report to the police, cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should also still consider and discuss any such case with the Designated Safeguarding Lead.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Children may be married at a very young age, and well below the age of consent in England. Staff within the Trust receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for or use of terrorist violence.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

Staff within the Trust receive training to help to identify signs of extremism. Opportunities are provided in the curriculum and via assemblies to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice - Promoting

fundamental British Values as part of the Personal Development Programme/Personal, Social, Health and Economic (PHSE).

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent/carer or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the safeguarding team and the school should notify the local authority of the circumstances.

Special Circumstances

Children Looked After (CLA)

The most common reason for children becoming looked after is as a result of abuse or neglect. The Trust ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teachers and DSL for looked after children will have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with the school and the DSLs will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

Work experience

The Trust has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2024).*

Children staying with host families

The Trust may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to

satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The Trust follows the guidance in Annex E of *Keeping Children Safe in Education (2024)* to ensure that hosting arrangements are as safe as possible.

Appendix One
Four categories of abuse

Physical abuse
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse
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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect
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); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding leads.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the safeguarding team to decide how to proceed.

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

Appendix Two

Related Safeguarding policies

- Code of Conduct for Employees in School
- Use of Force to Restrain Students Policy
- Standards and Expectations Policy
- Complaints Procedure
- Whistleblowing Policy
- SEND Policy
- Recruitment and Selection Policy and Procedure
- Policy and Procedure for Dealing with Allegations of Abuse Towards Staff
- Grievance Policy
- E-Safety Guidance
- Data Protection Policy
- ICT Acceptable Use Agreement

Appendix Three - Reports of Child on Child Abuse Flow Chart

Reports of Child on Child abuse flow chart

Definitions
Sexual Violence
Rape
Assault by penetration

Sexual Harassment
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behavior or online sexual harassment

Record-keeping
Remember, to record all concerns, discussions, decisions and reasons for decisions.

REPORT RECEIVED
(from the victim or third-party)
[Onsite, offsite or online]

Victim reassured
- Taken seriously and kept safe
- Confidentiality not promised
- Listen to victim, non-judgmentally
- Record the disclosure (facts as reported)
- Two staff present (one being the DSL, or reported to DSL as soon as possible)
- Victim sensitively informed about referral to other agencies
- If victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children
- Parents/carers of victim informed

Anonymity
Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the school.

Considerations
(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)
Immediately: Consider how to support the victim and the alleged perpetrator
- **Wishes of the victim**
- **One-off, or part of a pattern of behavior**
- **Ages of the children**
- **Development stage of the child**
- **Any power imbalance**
- **Nature of the alleged incident**
- **Any ongoing risks**
- **Other related issues and wider context**

MANAGE INTERNALLY
One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's Standards and Expectations policy

EARLY HELP
Non-violent Harmful Sexual Behaviours
(see harmful Sexual Behaviours Framework (NSPCC) and the Brook Traffic Light Tool

REFER TO SOCIAL CARE
All incidents where a child has been harmed, is at risk of harm or is in immediate danger.
Social Care staff will decide next steps. Be ready to escalate if **necessary**

REFER TO POLICE
All incidents of rape, assault by penetration or sexual assault.
Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents/carers.

Risk Assessment
Case-by case basis

SAFEGUARDING AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

DISCIPLINARY MEASURES TAKEN
(See school's Standards and Expectations Policy)

CRIMINAL PROCESS ENDS
- Conviction or Caution: follow school's Standards and Expectations Policy, consider Permanent Exclusion. If pupil remains in school, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- Not Guilty: Support victim and alleged perpetrator.
- No Further Action: Support victim and alleged perpetrator.

Risk Assessment
Immediately
Do not wait for outcome of referral before protecting victim.
Emphasis on victim being able to continue normal routines.
Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from school)
(Not a judgement of guilt)

SAFEGUARDING AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR

DISCIPLINARY MEASURES TAKEN
(May be undertaken based on balance of probabilities, unless prejudicial or unreasonable)
Ensure actions do not jeopardise the investigation
School to work closely with police and/or other agencies

Appendix 4 - Low-Level Concern Record

This Low-Level Concern Record can be used to share any concern with the Headteacher, no matter how small or seemingly insignificant, 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 Trust's Code of Conduct and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.
A concise record is required, including brief context in which the low-level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. The record should be signed and dated.

Details of CONCERN:

Name of staff member involved in the low-level concern: **Role:** **Date of birth:**
Name of staff member reporting the low-level concern: **Role:** **Time and Date:** **Signed:**

Received by: **At [time]:** **Date:**

WAS THE STAFF MEMBER SPOKEN TO? **YES ☐** **NO ☐ - Give a brief but valid reason/explanation for why not;**
YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN: **ACTION TAKEN:** Was advice/guidance sought from the LADO and/or Human Resources? Yes: ☐ No: ☐

Signed:	**Dated:**

This record will be held securely, in one central file in accordance with the Trust's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with the Trust's data management practices/policies.
Low-Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons.

Appendix Five

Key Personnel

Key personnel

The Designated Safeguarding Lead (DSL) for child protection for the Trust is Adelle Greenwood

Contact details: email: agreenwood@theoaktrust.org.uk tel: .0161 624 9939

The Designated Safeguarding Lead (DSL) for child protection and the Mental Health Lead at North Chadderton School is Nikola Westhead

Contact details: email: nwesthead@northchadderton.oldham.sch.uk tel: 0161 624 9939

The Nominated Child Protection Local Advisory Committee Member at North Chadderton School is Clare Cheetham

Contact details: email: ccheetham@northchadderton.oldham.sch.uk tel: 0161 624 9939

The Co-Headteachers at North Chadderton School are Nick Angus and Nik Westhead

Contact details: email nangus@northchadderton.oldham.sch.uk tel: 0161 624 9939

nwesthead@northchadderton.oldham.sch.uk tel: 0161 624 9939

The Nominated Child Protection Local Advisory Committee Member at Thorp Primary School is Catherine Fox

Contact details: email: c.fox@thorpschool.uk tel: 0161 823 0520

The Designated Safeguarding Lead (DSL) for child protection at Thorp Primary School is Lisa Graham

The Headteacher at Thorp Primary School **is** Lisa Graham

Contact details: email: l.graham@theoaktrust.org.uk tel: 0161 823 0520

The Nominated Child Protection Local Advisory Committee Member at Fir Bank School is Rachel Cowen

Contact details: email: RCowen@firbank.oldham.sch.uk tel: 0161 624 9577

The Designated Safeguarding Lead (DSL) for child protection at Fir Bank Primary School is Rachael McLaughlin

The Headteacher at Fir Bank Primary School is Rachael McLaughlin

Contact details: email: RMCLaughlin@firbank.oldham.sch.uk tel: 0161 624 9577

The Nominated Child Protection Trust Board Member is Rebecca Hirst

Contact details: email: rhirst@theoaktrust.org.uk tel: 0161 624 9939