



## **Safeguarding and Child Protection Policy**

**Ratified by Governors: September 2023**

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## Foreword by Headteacher

Safeguarding the welfare of our young people is our highest priority. Safeguarding and child protection are everyone's responsibility. Our aim is to develop and maintain a culture of vigilance to ensure that signs and symptoms of abuse are picked up and the opportunity for those wishing to cause harm to children is drastically reduced.

### 1. Purpose and Principles

The purpose of this document is to ensure that all stakeholders are aware of the arrangements that Stretford Grammar School has in place for safeguarding and promoting the welfare of its students. It provides guidance to help staff who may have concerns about the safety or welfare of a child and sets out the school's position in relation to the safeguarding process.

### 2. This Policy:

- This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2023) 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. It reflects Trafford Strategic Safeguarding Partnership Multi-agency safeguarding arrangements
- This policy is also based on the following legislation:
- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- 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
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their students regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show that it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial

discrimination applies at all times when the school is providing services or activities directly under the management of the Stretford Grammar staff

- is publicly available on the school's website
- is consistent with all other policies adopted by the Governors and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:
  - Behaviour Policy
  - Anti-Bullying Policy (change to Child on Child Abuse Policy)
  - Staff Code of Conduct
  - Policy for Dealing with Allegations Against Staff
  - Online Safety Policy
  - Whistle Blowing Policy
  - Complaints Policy
  - Attendance Policy

### **3. Definitions**

- 1. Safeguarding and promoting the welfare of children** means:
  - Protecting children from maltreatment
  - Preventing impairment of children's mental and physical health or development
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - Taking action to enable all children to have the best outcomes
- 2. Children** includes everyone under the age of 18.
- 3.** There is a glossary on page ... which provides definitions of key safeguarding and child protection terms.
- 4.** The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - The local authority (LA)
  - A clinical commissioning group for an area within the LA
  - The chief officer of police for a police area in the LA area
- 5. Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 6. Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

### **4. Equality statement**

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 21). We understand that we may need to make reasonable adjustments for students with SEND
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality such as being LGBTQ+ or are perceived to be LGBTQ+
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual 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 (see section 12)
- Are missing/absent from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Key Personnel Information

Below is a table of people with specific lead responsibilities around safeguarding.

Harry Almond	Chair of Governing Body Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:admin@stretfordgrammar.com">admin@stretfordgrammar.com</a>
David Wilson	Nominated Governor for Safeguarding Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:admin@stretfordgrammar.com">admin@stretfordgrammar.com</a>
Michael Mullins	Headteacher Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:admin@stretfordgrammar.com">admin@stretfordgrammar.com</a>
Helen Dolphin	Designated Safeguarding Lead Designated Teacher for students who are looked after Designated Senior Mental Health Lead Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:h.dolphin@stretfordgrammar.com">h.dolphin@stretfordgrammar.com</a>
David Price	Deputy Designated Safeguarding Lead Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:d.price@stretfordgrammar.com">d.price@stretfordgrammar.com</a>
Steve Marshall	Deputy Designated Safeguarding Lead Contact Telephone: 0161 865 2293 Contact Email: <a href="mailto:s.marshall@stretfordgrammar.com">s.marshall@stretfordgrammar.com</a>

## 6. Roles and Responsibilities

- Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities
- The school has a strong relationship with the Trafford Strategic Safeguarding Partnership

- The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:
  - Behaviour policy
  - Pastoral support system
  - Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they are always unacceptable

## 1. All Staff

- All adults working in this school (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead (DSL) who is a member of the school's leadership team
- All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- All staff will complete a Google Form at the beginning of each academic year to confirm that they have reviewed the guidance
- All staff will be aware of:
  - Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy designated leads (DDSL), the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education
  - The Early Help process through Trafford Teams Together or Intensive Family Support and their role in it, as well as the Early Help system in Manchester, including identifying emerging problems, liaising with the DSL or deputies, and sharing information with other professionals to support early identification and assessment
  - The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
  - What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
  - The issue that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another
  - The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
  - Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
  - 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 importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
  - The fact that children can be at risk of harm inside and outside of their home, at school and online
  - The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
  - What to look for to identify children who need help or protection
- A variety of learning materials on safeguarding are made available in school to ensure staff continually develop their understanding and practice around safeguarding, these include:
    - Face-to-face training
    - Briefing updates
    - Inset updates
    - Leaflets
    - Online learning
    - Posters in the Staff Room detailing referral processes and key topics
    - Staff Handbook
    - Staff Induction programme
    - Training
    - Videos
    - NSPCC and Andrew Hall email updates for staff and governors as required
  - All learning and training are documented. Safeguarding training forms part of the induction process for all members of staff
  - All staff are aware of Trafford's Levels of Need threshold guidance and this is used by the DSL and Safeguarding Team prior to referrals to First Response.
  - The DSL and Safeguarding Team are aware of the Manchester Safeguarding Partnership process for referrals for children who reside in the Manchester locality. See Appendix 1
  - Safeguarding is always re-visited at least on an annual basis

## **2. The Designated Safeguarding Lead (DSL)**

- The DSL is a member of the senior leadership team. The school's DSL is Mrs Helen Dolphin. The DSL takes lead responsibility for child protection and wider safeguarding in the school.
- The DSL is also the first point of contact for external agencies and is responsible for their school's contribution and commitment to any plans, team around the family and core groups or other assessment. These meetings include:
  - Team around the Family Meetings (Early Help)
  - Strategy Discussions
  - Child in Need Meetings
  - Initial Child Protection Conferences
  - Review Child Protection Conferences
  - Multiagency Risk Assessment Conferences (MARAC)
- The DSL can be contacted by email directly or through [admin@stretfordgrammar.com](mailto:admin@stretfordgrammar.com). The website also provides an online reporting form. When the DSL is absent, the deputies will act as cover.
- The DSL will be 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, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour
  - Have a good understanding of the filtering and monitoring systems and processes in school
  - Keep the Headteacher informed of any issues
  - Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
  - Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- When an individual concern/incident is brought to the notice of the DSL or DDSs, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue or whether a single agency response is more appropriate and proportional (Early Help Level 2 of the Level of Need). Where possible, the Safeguarding Team would usually discuss cases as they arise to make a joint decision on a response
  - If the school identifies emerging needs or if emerging needs are identified by other professionals, and/or the family themselves and the school is best placed to provide a single agency response to the presenting need(s), we will do so under the banner of Early Help through Trafford Teams Together for students residing in Trafford and for the equivalent for students residing in other authorities. We will utilise our internal support network of the Safeguarding Team including Progress Leaders, the Director of Sixth Form, SENCo, School Nurse and Counsellors and document the Early Help provided on CPOMS. This is just for cases that are at Level 2 of the Level of Need<sup>1</sup> See Appendix 9
  - Whilst engaging other services outside of our school to form part of a team around the family, we will utilise Trafford Teams Together or equivalents in other authorities to ensure that this is formalised in a consistent way for all agencies involved at that point. Where necessary we will complete an Early Help Assessment to identify specific needs that require the assistance of other services outside of school
  - Arrangements are in place to ensure that at least one of the DSL trained persons in school is available when children are taking part in school led activity, this includes before and after school clubs and other extra-curricular activities. The DSL and Deputy DSL have access to a school mobile phone and one person will be available when these activities are taking place. If circumstances dictate that a member of the school's safeguarding team is unavailable, then the next most senior member of staff will deal with incidents as trained to do so. Incidents will be passed to the safeguarding team as soon as possible
  - If a child is in immediate danger or is at risk of harm, a referral will be made to Trafford Council's First Response (children's social care) on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours (Emergency Duty Team) or if a young person is in immediate danger, the police on 999. For a child residing in Manchester the details are 0161 234 5001 or [mcsreply@manchester.gov.uk](mailto:mcsreply@manchester.gov.uk) Anyone can make a referral and all staff have been trained and are aware of what to do with regards to making contact with First Response.
  - All verbal conversations that take place regarding safeguarding concerns will promptly be recorded via the school's safeguarding records on CPOMS (the school's web-based safeguarding database)

## **2. The Governing Body will:**

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

<sup>1</sup> The Trafford Strategic Safeguarding Partnership Level of Need is a document that provides a useful guide for professionals to determine what level of service provision is appropriate and proportionate, based on the individual child and family's needs - [Level of Need document](#)



- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - That the school has appropriate filtering and monitoring systems in place and review their effectiveness
  - That online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies including that training on monitoring and filtering processes is delivered to staff
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 5 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see).
- All governors will read Keeping Children Safe in Education in its entirety.

### 3. The Headteacher

- The Headteacher is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

### 5. Virtual School Heads

- Virtual school Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker
- They should also identify and engage with key professionals, e.g., DSLs, SENCOs, social workers, mental health leads and others

## **7. Confidentiality**

- Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- All information is handled in line with the school's Information Sharing/Management Policy, which is written in line with HM Government guidance – Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent under certain conditions.
- If it is not possible to gain consent or if to gain consent would place a child at risk, we would proceed in referring to external services
- Staff never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about any sexual violence or sexual harassment the DSL will balance the victim's wishes against the duty to protect the victim and other children
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will always be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

## **8. Recognising abuse and taking action**

- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
- If a child is suffering or likely to suffer harm, or in immediate danger and the DSL is not available:
  - Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Referral details can be found in Appendix 1
  - Tell the DSL (as soon as possible if you make a referral directly)

### **1. If a child makes a disclosure to you**

- If a child discloses a safeguarding issue to you, you should:
  - Ask them if they would mind if you involve another adult of their choice. This will allow for notetaking whilst one of you is listening. If they do not agree to this, proceed without an additional adult present
  - Listen to and believe them. Allow them time to talk freely and do not ask leading questions
  - Stay calm and do not show that you are shocked or upset

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Log the incident on CPOMS and attach the notes. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child

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

- 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'
- **Any teacher** who either:
  - Is informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
  - Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it
  - Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures
- The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students
- **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL who will make a referral to First Response
- Staff are directed to the NSPCC's website for guidance on signs and symptoms of Female Genital Mutilation (FGM) - <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/signs-symptoms-and-effects/>.

### 4. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- Appendix 2, illustrates the procedure to follow if you have any concerns about a child's welfare.
- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from Trafford First Response or the equivalent for other authorities (see Appendix 1)

- You can also seek advice at any time from the NSPCC helpline on 0808 800 5000 Share details of any actions you take with the DSL as soon as practically possible

#### **9. Early Help /Trafford Teams Together (TTT)**

- If Early Help is appropriate, the DSL will generally lead on liaising with Trafford Teams Together or Early Help in other authorities in setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help assessment, in some cases acting as the lead practitioner
- We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements
- The DSL will keep the case under constant review and the school will consider a referral to local authority children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed

#### **10. Operation Encompass**

- Operation Encompass is an agreement between Greater Manchester Police and schools within Trafford. This agreement facilitates the sharing of information relating to domestic incidents where children live or frequent. A flowchart explaining the process for sharing information through Operation Encompass can be found in Appendix 14

#### **11. Referral**

- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so
- If you make a referral directly, you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves

#### **12. 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 is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to First Response. Inform the DSL or deputy as soon as practically possible after the referral
- 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 school staff and governors can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
  - Think someone is in immediate danger
  - Think someone may be planning to travel to join an extremist group
  - See or hear something that may be terrorist-related

#### **13. If you have a mental health concern**

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

- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Appendix 2
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL, Progress Leader or SENCo to agree a course of action
- We work closely with Trafford Thrive to provide support for young people and have a dedicated School Counsellor

Commented [EB1]: Which one?

#### **14. Concerns about a staff member, supply teacher, volunteer or contractor**

- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors
- The Headteacher/Chair of Governors will then follow the procedures set out in Appendix 5, if appropriate.
- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. The Headteacher will then follow the procedures set out in Appendix 5, if appropriate
- If the concerns/allegations are about the Headteacher, speak to the local authority designated officer (LADO). Contact details in Appendix 1
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO). The link to the referral form is:

<https://trafford-framework.egovhub.net/ALLEGATIONOFPROFESSIONALABUSE/launch>

#### **15. Allegations of abuse made against other students**

- We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students
- We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously
- Most cases of students hurting other students will be dealt with under our school’s Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
  - Is serious, and potentially a criminal offence
  - Could put students in the school at risk
  - Is violent
  - Involves students being forced to use drugs or alcohol
  - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- See the Glossary for more information about child-on-child abuse

#### **16. Procedures for dealing with allegations of child-on-child abuse**

- If a student makes an allegation of abuse against another student:
  - You must record the allegation and tell the DSL, but do not investigate it
  - The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
  - The DSL will put a risk assessment and safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any

others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation. Further information can be found in the Managing Allegations of Child-On-Child Abuse Policy

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

- We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- To achieve this, we will:
  - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending nude or semi-nude photos
  - Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
  - Ensure our curriculum helps to educate students about appropriate behaviour and consent
  - Ensure students are able to easily and confidently report abuse using our reporting systems such as the form for reporting on the website under students and wellbeing
  - Ensure staff reassure victims that they are being taken seriously
  - Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
  - Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
  - Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
  - Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
    - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
      - Children can show signs or act in ways they hope adults will notice and react to
      - A friend may make a report
      - A member of staff may overhear a conversation
      - A child’s behaviour might indicate that something is wrong
      - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
      - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
      - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
      - That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

All documentation will be logged on CPOMS and shared on a need-to-know basis.

## **18. Sharing of nudes and semi-nudes ('sexting')**

- Our approach is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. See Appendix 7
- 2. Our responsibilities when responding to an incident**
  - If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
  - You must **not**:
    - View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
    - Delete the imagery or ask the student to delete it
    - Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
    - Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
    - Say or do anything to blame or shame any young people involved
  - You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL

## **2. Initial review meeting**

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - Whether there is an immediate risk to student(s)
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the students involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
    - The incident involves an adult
    - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
    - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
    - The imagery involves sexual acts and any student in the images or videos is under 13
    - The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
    - If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded on CPOMS

### **3. Further review by the DSL**

- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- The DSL will hold interviews with the students involved (if appropriate).
- If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **4. Informing parents/carers**

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

### **5. Referring to the police**

- If it is necessary to refer an incident to the police, this will be done by dialling 101

### **6. Recording incidents**

- All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS

### **7. Curriculum coverage**

- Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
  - What it is
  - How it is most likely to be encountered
  - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
  - Issues of legality
  - The risk of damage to people's feelings and reputation
- Students also learn the strategies and skills needed to manage:



- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident

## **8. Reporting systems for our students**

- Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
  - Put systems in place for students to confidently report abuse
  - Ensure our reporting systems are well promoted, easily understood and easily accessible for students
  - Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
  - There is a reporting form for students on the school website as well as a place on their home page. Link here: <https://www.stretfordgrammar.com/wellbeing>
  - Through assemblies, PSHCE lessons, form times and displays, students are taught and reminded about ways they can report concerns

## **19. 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 students, 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. Student mobile phones must be switched off and out of sight on school premises
  - Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **1. The 4 key categories of risk**

- Our approach to online safety is based on addressing the following categories of risk:
  - Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
  - Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
  - Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
  - Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### **2. To meet our aims and address the risks above we will:**

- Educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. Provide training on filtering and monitoring procedures and their responsibilities. 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 parent information evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
  - Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present
    - Staff will not take pictures or recordings of students on their personal phones or cameras
  - Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
  - Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
  - Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
  - Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
  - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
  - For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our Online Safety Policy and Mobile Phone Policy, which you can find on our website [\*\*www.stretfordgrammar.com\*\*](http://www.stretfordgrammar.com)

## **20. Notifying parents or carers**

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
  - Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
  - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## **21. Students with special educational needs, disabilities or health issues**

- We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
  - Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
  - The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
  - Communication barriers and difficulties in managing or reporting these challenges
  - Reasonable adjustments may be required in managing and responding to safeguarding incidents such as:
    - Having a key worker and regular reviews to facilitate the sharing of information
    - Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO

## **22. Students with a social worker**

- Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:
  - Responding to unauthorised absence or missing/absent from education where there are known safeguarding risks
  - The provision of pastoral and/or academic support

## **23. Looked-after and previously looked-after children**

- We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
  - Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
  - The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, Mrs Dolphin, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- As part of their role, the designated teacher will:
  - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

#### **24. Searching, screening and confiscation**

- Searching and screening students is conducted in line with the DfE's [latest guidance on searching, screening and confiscation](#)
- Searches of students will take place if we have reason to believe that items in their possession might be a risk to themselves or others as per the school [behavior policy](#)
- Only SLT and Progress Leaders are authorised to conduct searches of students
- Verbal permission of the student to conduct the search should be requested before any search
- If there is a safeguarding concern, the search can go ahead without the consent of the student
- The searcher must explain to the student the reason for the search
- Permission of the student has to be gained if the item is not a banned item
- The person carrying out the search must be the same sex as the student
- There must be another member of staff present unless the searcher believes there is a risk of serious harm if the search isn't carried out immediately
- Details of all searches must be logged on CPOMS
- Strip searches are not permitted to be conducted by school staff

#### **25. 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

#### **26. Other complaints**

- Procedures for dealing with complaints can be found in the Complaints Policy on our website

#### **27. Whistle-blowing**

- Procedures for whistleblowing are outlined in our Whistleblowing Policy which can be found on the website

#### **28. Record-keeping**

- We will hold records in line with our records retention schedule
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL
- Records will include:
  - A clear and comprehensive summary of the concern
  - Details of how the concern was followed up and resolved
  - A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept on CPOMS
- Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.
- To allow the new school/college to have support in place when the child arrives, this should be within:
  - **5 days** for an in-year transfer, or within
  - **The first 5 days** of the start of a new term
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child
- Appendix 4 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 5 sets out our policy on record-keeping with respect to allegations of abuse made against **staff**

## **29. Learning and Development**

### **1. All staff**

- All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the 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 the whole-school safeguarding approach and wider staff training, and curriculum planning
  - Be in line with advice from the 3 safeguarding partners
  - Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all students
- All staff will have training on the Government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- Volunteers will receive appropriate training, if applicable

### **2. The DSL and deputies**

- The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, attending Trafford meetings, meeting other DSLs, or taking time to read and digest safeguarding developments)
- The DSL will have half-termly one-to-one or group supervision sessions
- They will also undertake Prevent Awareness training.

### **3. Governors**

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose

### **30. Recruitment – interview panels**

- At least 1 person conducting any interview for any post at the school will have undertaken Safer Recruitment Training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures
- See **Appendix 3** of this policy for more information about our safer recruitment procedures

### **31. Monitoring arrangements**

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

### **30. Glossary**

Term	Meaning
A Child	A person who has not yet reached their 18 <sup>th</sup> birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"> <li>• repeated</li> <li>• intended to hurt someone either physically or emotionally</li> <li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li> </ul>
<a href="#">Child abuse linked to faith or belief (CALFB)</a>	Child abuse linked to faith or belief (CALFB) can happen in families when there is a concept of belief in: <ul style="list-style-type: none"> <li>• Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)</li> <li>• The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)</li> <li>• Ritual or multi murders where the killing of children is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies</li> <li>• Use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune.</li> </ul>
Child on Child Abuse	Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): <ul style="list-style-type: none"> <li>• bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>• abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')</li> <li>• 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)</li> <li>• 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)</li> <li>sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse</li> <li>• 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</li> <li>• consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)</li> </ul>

Term	Meaning
	<ul style="list-style-type: none"> <li>• 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, and</li> <li>• 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).</li> </ul>
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	<p>SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.</p> <p>Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.</p>
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
County Lines	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	<ol style="list-style-type: none"> <li>1. Domestic abuse, or domestic violence, is defined across Government as "any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 and over who are or have been intimate partners or family members, regardless of gender and sexuality.</li> <li>2. This can encompass, but is not limited to, the following types of abuse: <ul style="list-style-type: none"> <li>• Psychological</li> <li>• Physical</li> <li>• Sexual</li> <li>• Financial</li> <li>• Emotional</li> <li>• Harassment and Stalking</li> <li>• Controlling behaviour</li> <li>• Coercive control <ol style="list-style-type: none"> <li>1. Controlling behaviour is: a range of acts designed to make a person subordinate and/ or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of</li> </ol> </li> </ul> </li> </ol>



Term	Meaning
	<p>them of the means needed for independence, resistance and escape and regulating their everyday behaviour.</p> <p>2. Coercive behaviour is: an act or a pattern of acts of assault, threats humiliation and intimidation or other abuse that is used to harms, punish, or frighten their victim. This includes issues of concern to black and minority ethnic (BAME) communities such as so-called 'honour based' violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to on gender or ethnic group</p>
Early Help	Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising.
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	<p>Defining a gang is difficult, They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.</p> <p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation.</li> </ul>
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

Term	Meaning
Consensual and non-consensual sharing of nude/semi-nude images	<p>Taking, making, sharing and possessing indecent images and pseudo-photographs of people under 18 is illegal.</p> <p>A pseudo-photograph is an image made by computer-graphics or otherwise which appears to be a photograph.</p> <p>This can include:</p> <ul style="list-style-type: none"> <li>• photos</li> <li>• videos</li> <li>• tracings and derivatives of a photograph</li> <li>• data that can be converted into a photograph</li> <li>• 'indecent' is not defined in legislation but can include penetrative and non-penetrative sexual activity</li> <li>• 'making' can include opening, accessing, downloading and storing online content</li> <li>• 'sharing' includes sending on an email, offering on a file sharing platform, uploading to a site that other people have access to, and possessing with a view to distribute</li> </ul>
Incel	Incel is a shortened version of involuntary celibate ( <a href="#">Hall</a> , 2019), The term involuntary celibate was seen as a person who "had not had sex for some time, despite trying". The term manosphere is used to describe a network of online communities which are male dominated and promote anti-feminist, sexist beliefs and seek to blame women for problems within society
<a href="#">Mental Health</a>	<p>Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:</p> <ul style="list-style-type: none"> <li>• Emotional state (fearful, withdrawn, low self-esteem)</li> <li>• Behaviour (aggressive or oppositional; habitual body rocking)</li> <li>• Interpersonal behaviours (indiscriminate contact or affection seeking, over-friendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).</li> </ul>
Modern Slavery	Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
Neglect	<p>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• Protect a child from physical and emotional harm or danger.</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>
Operation Encompass	Operation Encompass operates in all 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

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	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 immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	<p>Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p> <p>Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.</p>
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> <li>protecting children from maltreatment;</li> <li>preventing impairment of children's health or development;</li> <li>ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>taking action to enable all children to have the best outcomes.</li> </ul>
Serious Violence	<p>The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.</p> <ul style="list-style-type: none"> <li><b>Peer group</b> A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.</li> <li><b>Street gang</b> "Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."</li> <li><b>Organised criminal gangs</b> "A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their 'occupation'."</li> </ul> <p>It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal</p>

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	activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.
Sexual Abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and <b>all</b> staff should be aware of it and of their school or college's policy and procedures for dealing with it.
Sexual harassment between children	When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. 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, and can include: sexual comments, sexual jokes or taunting, online sexual harassment or physical behaviour such as deliberately brushing against someone.
Sexual violence between children	When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 <sup>2</sup> . Sexual violence offences include: rape, assault by penetration and sexual assault.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

Term	Meaning
A Child	A person who has not yet reached their 18 <sup>th</sup> birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"> <li>• repeated</li> <li>• intended to hurt someone either physically or emotionally</li> <li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li> </ul>
<a href="#">Child abuse linked to faith or belief (CALFB)</a>	Child abuse linked to faith or belief (CALFB) can happen in families when there is a concept of belief in: <ul style="list-style-type: none"> <li>• Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)</li> <li>• The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)</li> <li>• Ritual or multi murders where the killing of children is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies</li> <li>• Use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune.</li> </ul>
Child on Child Abuse	Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): <ul style="list-style-type: none"> <li>• bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>• abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')</li> <li>• 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)</li> <li>• 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)</li> <li>sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse</li> <li>• 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</li> <li>• consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)</li> </ul>

Term	Meaning
	<ul style="list-style-type: none"> <li>• 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, and</li> <li>• 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).</li> </ul>
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	<p>SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.</p> <p>Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.</p>
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
County Lines	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
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Domestic Abuse	<p>3. Domestic abuse, or domestic violence, is defined across Government as "any incident, or pattern of incidents, of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 and over who are or have been intimate partners or family members, regardless of gender and sexuality.</p> <p>4. This can encompass, but is not limited to, the following types of abuse:</p> <ul style="list-style-type: none"> <li>• Psychological</li> <li>• Physical</li> <li>• Sexual</li> <li>• Financial</li> <li>• Emotional</li> <li>• Harassment and Stalking</li> <li>• Controlling behaviour</li> <li>• Coercive control</li> </ul> <p>1. Controlling behaviour is: a range of acts designed to make a person subordinate and/ or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of</p>

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	<p>them of the means needed for independence, resistance and escape and regulating their everyday behaviour.</p> <p>2. Coercive behaviour is: an act or a pattern of acts of assault, threats humiliation and intimidation or other abuse that is used to harms, punish, or frighten their victim. This includes issues of concern to black and minority ethnic (BAME) communities such as so-called 'honour based' violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to on gender or ethnic group</p>
Early Help	Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising.
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
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Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation.</li> </ul>
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Incel	<p>Incel is a shortened version of involuntary celibate (<a href="#">Hall</a>, 2019), The term involuntary celibate was seen as a person who "had not had sex for some time, despite trying". The term manosphere is used to describe a network of online communities which are male dominated and promote anti-feminist, sexist beliefs and seek to blame women for problems within society</p>
<a href="#">Mental Health</a>	<p>Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:</p> <ul style="list-style-type: none"> <li>• Emotional state (fearful, withdrawn, low self-esteem)</li> <li>• Behaviour (aggressive or oppositional; habitual body rocking)</li> <li>• Interpersonal behaviours (indiscriminate contact or affection seeking, over-friendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).</li> </ul>
Modern Slavery	<p>Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.</p>
Neglect	<p>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• Protect a child from physical and emotional harm or danger.</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>
Operation Encompass	<p>Operation Encompass operates in all 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</p>



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Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> <li>protecting children from maltreatment;</li> <li>preventing impairment of children's health or development;</li> <li>ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>taking action to enable all children to have the best outcomes.</li> </ul>
Serious Violence	<p>The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.</p> <ul style="list-style-type: none"> <li><b>Peer group</b> A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.</li> <li><b>Street gang</b> "Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."</li> <li><b>Organised criminal gangs</b> "A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their 'occupation'."</li> </ul> <p>It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal</p>

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Sexual harassment between children	When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. 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, and can include: sexual comments, sexual jokes or taunting, online sexual harassment or physical behaviour such as deliberately brushing against someone.
Sexual violence between children	When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 <sup>3</sup> . Sexual violence offences include: rape, assault by penetration and sexual assault.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

## **Appendix 1 Contact Details – Key Services**

### **Social Services**

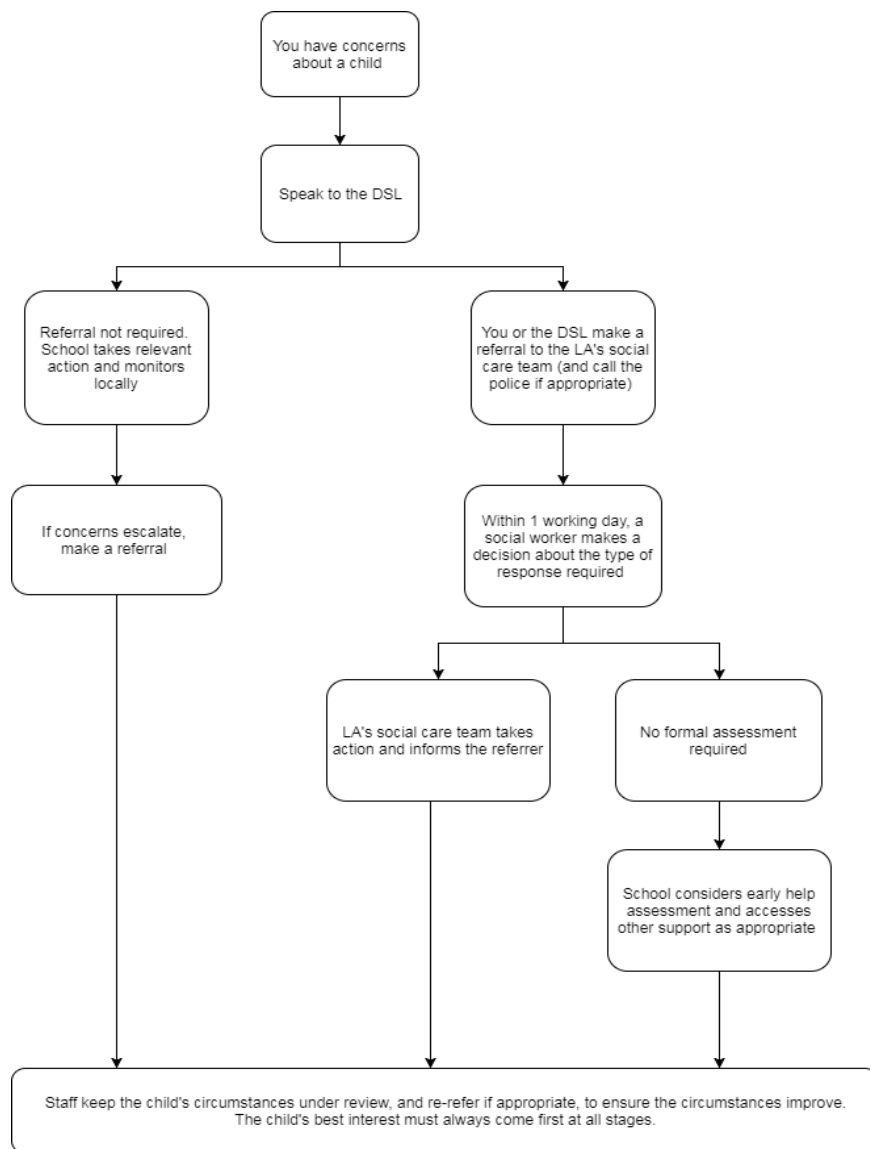
- Trafford Directory of Services  
<https://www.trafforddirectory.co.uk/kb5/trafford/fsd/family.page?newfamilychannel=0>,
- Greater Manchester Directory of Support  
<https://hsm.manchester.gov.uk/kb5/manchester/directory/home.pageServices>,
- Salford  
[Children and families • Salford City Council](#)
- Warrington  
<https://www.warrington.gov.uk/children-young-people-and-families>
- Cheshire East  
<https://www.cheshireeast.gov.uk/livewell/livewell.aspx>
- Stockport  
<https://stockport.fsd.org.uk/kb5/stockport/fsd/advice.page?id=zPqonwIQaX0>
- Cheshire West and Chester West

[https://www.livewell.cheshirewestandchester.gov.uk/?utm\\_campaign=livewell&utm\\_source=corpsite&utm\\_medium=sidemenu](https://www.livewell.cheshirewestandchester.gov.uk/?utm_campaign=livewell&utm_source=corpsite&utm_medium=sidemenu)

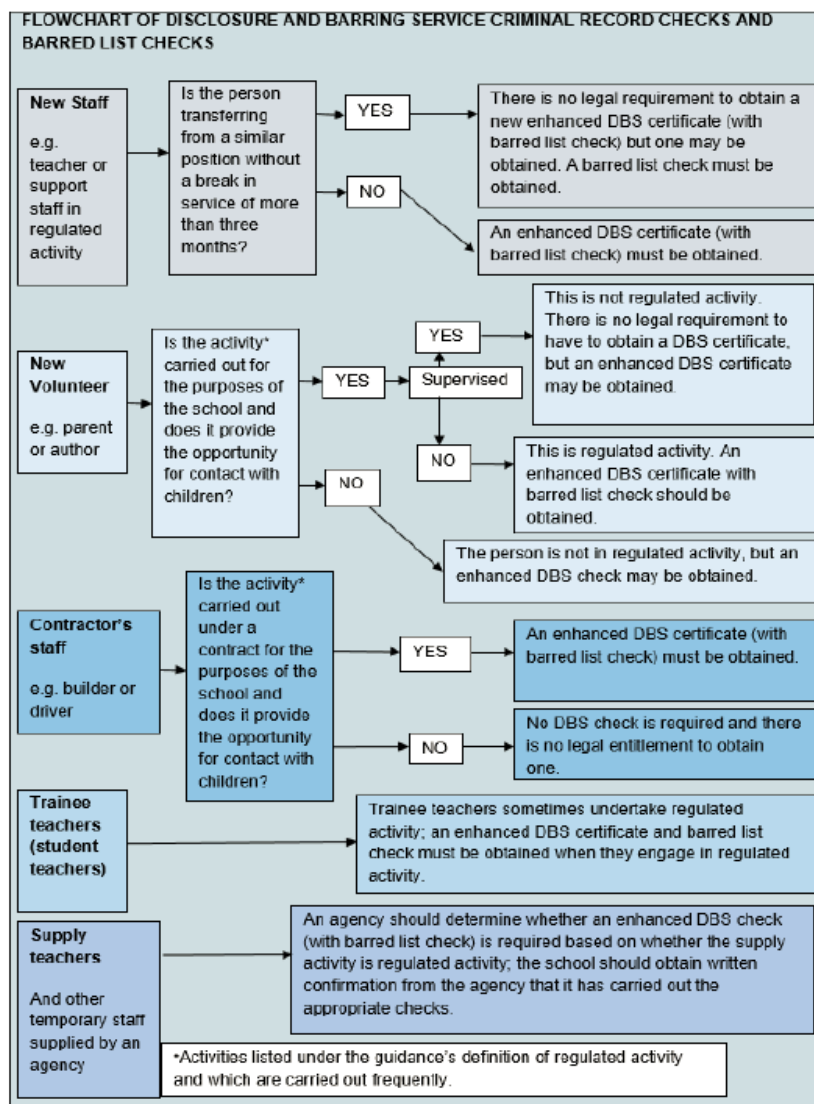
Trafford Children's First Response 0161 912 5125 <a href="mailto:FirstResponse@trafford.gov.uk">FirstResponse@trafford.gov.uk</a>	Local Authority Designated Officer (LADO) 0161 912 5125 <a href="mailto:FirstResponse@trafford.gov.uk">FirstResponse@trafford.gov.uk</a> <a href="mailto:LADO@trafford.gov.uk">LADO@trafford.gov.uk</a>
Trafford Strategic Safeguarding Partnership 0161 911 8687 <a href="mailto:TSSP@trafford.gov.uk">TSSP@trafford.gov.uk</a>	Trafford Strategic Safeguarding Partnership – Training address <a href="mailto:TSSP.learning@trafford.gov.uk">TSSP.learning@trafford.gov.uk</a>
Social Care Out of Hours Emergency Duty Team 0161 912 2020	<u>Police</u> Non-emergency – 101 Emergency - 999
NW Counter-Terrorism Unit Channel Team 0161 856 6362 <a href="mailto:channel.project@gmp.police.uk">channel.project@gmp.police.uk</a>	NSPCC Whistleblowing Helpline <a href="#">NSPCC website</a>
<b>Manchester Children's Services</b>	Social Services – 0161 234 5001

**Appendix 2 Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action.)



## Appendix 3 DfE flowchart on DBS checks and barred list checks



## **Appendix 4 Safer Recruitment and DBS Checks – Policy and Procedures**

### **Recruitment and selection process**

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

### **Advertising**

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

### **Application forms**

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

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:  
Consider any inconsistencies and look for gaps in employment and reasons given for them  
Explore all potential concerns  
Once we have shortlisted candidates, we will ask shortlisted candidates to:  
Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

Sign a declaration confirming the information they have provided is true  
We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

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

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

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

### **Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### **Agency and third-party staff**

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

#### **Contractors**

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

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

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

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

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

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

#### **Trainee/student teachers**

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

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

#### **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.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK



### **Staff working in alternative provision settings**

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise students on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Students staying with host families**

Where the school makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are

### **Safer Recruitment Statement**

Stretford Grammar School is committed to safeguarding and promoting the welfare of children and young people in its academies. The school complies with the statutory legislative requirements and guidance that seeks to protect children including 'Keeping Children Safe in Education Guidance'. In order to meet this responsibility, we follow a rigorous selection process to discourage and screen out unsuitable applicants.

### **Safer Recruitment**

Job descriptions and persons specifications refer to safeguarding and child protection and all posts are subject to a Disclosure and Barring Service certificate (DBS). All advertisements include our safeguarding statement and commitment.

### **Application Stage**

- All applicants are scrutinised to verify identity and academic or vocational qualifications
- Professional references are requested using our standard proforma for shortlisted candidates
- References must cover a period of the last 2 years of employment. As a minimum these should be from the two most recent employers
- References are checked against previous employment history and gaps in employment
- Our standard reference proforma refers to suitability to work with children and young people
- Professional references must be obtained from professional email addresses
- The application form requires applicants to complete a disclosure of any criminal convictions

### **Shortlisting**

Only those candidates meeting the criteria outlined in the person specification will be shortlisted.

### **Interview**

- Shortlisted candidates will take part in an in-depth interview and selection process.
- Candidates will be asked to address any discrepancies, anomalies or gaps in employment in their application form this includes their employment history.
- Candidates at the end of their interview will be reminded of their responsibility to disclose criminal convictions that are subject to DBS check if they have not already done so on the application.
- Proof of right to work in the UK must also be provided at interview.

## **Appointment Disclosure and Barring Service and other pre-employment compliance checks**

- A Disclosure and Barring Service Certificate (DBS) will be required for all appointed posts, it is enhanced
- Fitness to work declaration will be required following appointment to ensure that a candidate has the health and physical capacity for the job
- Keeping Children Safe in Education declaration
- Further identity checks to determine you are who you say you are
- Inclusion on our Single Central Record (SCR)
- List 99 in some circumstances
- Prohibition checks for appropriate applicants

## **Probation**

All new staff will be subject to a probation period of six months.

The probation period is to enable the assessment of an employee's suitability for the job for which they have been employed which includes the monitor and review of the performance of new staff in relation to duties, skills, qualifications and experience outlined in the job description and person specification. This will also include an employee's suitability to work with children and young people and their commitment to safeguarding and child protection.

## **Equal Opportunities**

Stretford Grammar School recognises the value of, and seeks to achieve, a diverse workforce which includes people from all backgrounds. Stretford Grammar School takes positive steps to create an employment culture in which people feel confident of being treated with fairness, dignity and tolerance irrespective of their individual differences. This commitment extends beyond the relationship between and conduct of employees and potential employees, to the whole community.

Stretford Grammar School is committed to the elimination of unlawful discrimination and to the promotion of good relations between all.

## **General Data Protection Regulation**

Stretford Grammar School is the data controller of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed. In some cases, we may share your data will be outsourced to a third-party processor; however, this will only be done with your consent, unless the law requires the school to share your data. Where the school outsources data to a third-party processor, the same data protection standards that Stretford Grammar School upholds are imposed on the processor.

## **Appendix 5**

### **Allegations of Abuse Made Against Staff**

#### **Section 1: allegations that may meet the harms threshold**

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

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

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

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

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

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

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

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

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

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

### **Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence, on a balance of probability, to prove the allegation
- **Malicious:** there is sufficient evidence, on a balance of probability, to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence, on a balance of probability to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence, on a balance of probability to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis, on a balance of probability, which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff may be supported by a union representative or trusted colleague.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### **Additional considerations for supply teachers and all contracted staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

#### **Timescales**

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

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

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

### **Specific actions**

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

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

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

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

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

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

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

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

If an allegation is:

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

#### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

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

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

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

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

### **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

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

- This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Concerns may arise through, for example:

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

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

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

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

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

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

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

### **Record keeping**

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this Appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school  
Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included

## Responsibilities of staff

It is important that **all** staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff.

It is crucial that **any** concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headteacher. This should be done without delay. Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors (whose contact details can be found in the School's Safeguarding Policy document).

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the school's code of conduct and expectations, they self-refer to the Headteacher.

Dealing with Low-Level Concerns All low-level concerns may be shared verbally with the Headteacher in the first instance, but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Where the low-level concern is provided verbally, the Headteacher should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated. Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

## Responding to a Low-Level Concern

The Headteacher will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher-level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where:

- a. the threshold is met for a higher-level concern/allegation
- b. there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- c. there is other information which when considered leads to a higher-level concern/allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis. Having established that the concern is low-level, the Headteacher will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary.



If the concern has been raised via a third party, the Headteacher should 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. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken.

All of this needs to be recorded along with the rationale for their decisions and action taken.

Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.

Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's School Business Manager.

#### **Monitoring of Low-Level Concerns**

The Headteacher will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a. the concern (or group of concerns) has been reclassified as a higher-level concern, or
- b. the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

#### **Appendix 6 Department for Education- Child sexual exploitation**

Definition and a guide for practitioners, local leaders and decision makers working to protect children from sexual exploitation – February 2017

[Government website](#)

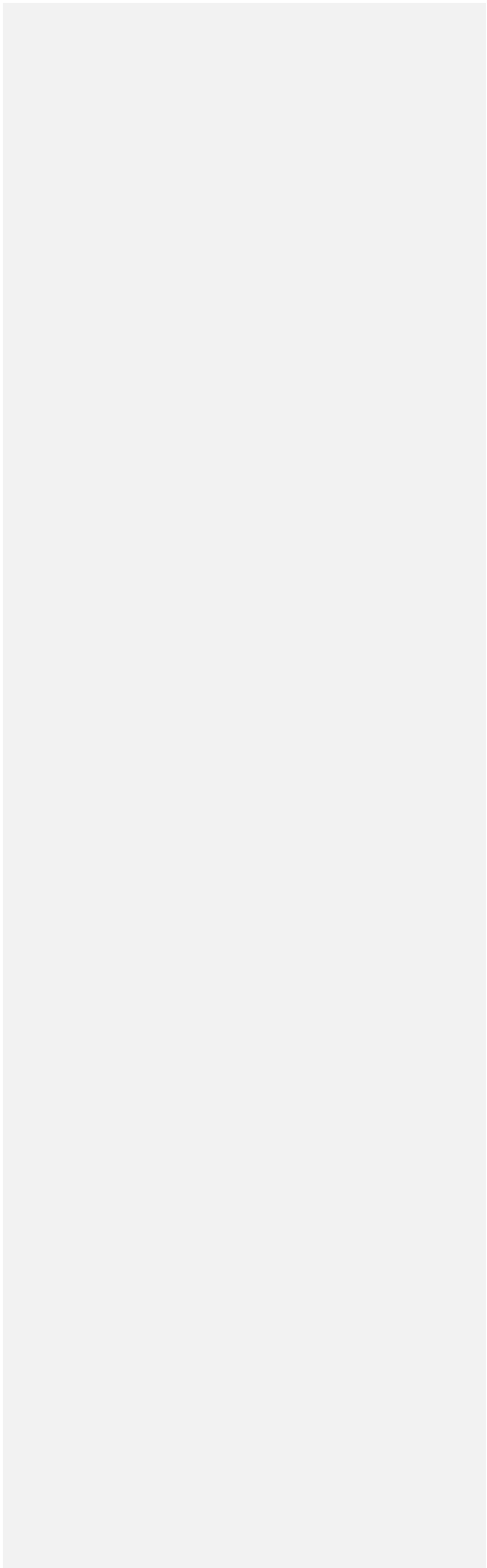
#### **Appendix 7 UK Council for Child Internet Safety guidance**

Sexting in schools and colleges: Responding to incidents and safeguarding young people - 2017

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

**Appendix 8 Staff Safeguarding Checklist**

  
Staff Safeguarding  
Checklist 2023.docx



## Appendix 9 Trafford Strategic Safeguarding Partnership Level of Need

Level		Description: At this level the child or family...	What Needs to happen next?	Assessment Required Referral Process
Universal	Level 1	...is thriving without requirement for additional support and all needs are being met by universal services, for example Health Visitor, School Nurse, Dentist or School.	Ensure that all families are aware of the Family Information Service and are registered with Education and Training providers, Health Services and Community Groups.	Use of Trafford Directory
Early Help / Prevention	Level 2	...may require or would benefit from additional input or support from an agency/agencies.	When a child begins to display emerging needs requiring additional support, services already working with the child should support the family by undertaking an assessment and develop an Outcome Plan. This will identify support from within the local community or a specific intervention.	Assessment required for example Early Help Assessment. Referral Form for specific agency
Intensive Family Support	Level 3	...are experiencing multiple and/or complex needs. The family is struggling to effect change without the support and intervention of services. There is a need for a greater level of support including regular home visits.	If a child or family's issues are more complex and cannot be managed within the community and the family consent, additional support can be sourced through Intensive Family Support. This would include support in the home, pulling in multi-agency partners who are, or need to be, involved with the child and family in order to achieve a positive outcome	Early Help Assessment; which will be required when referring for Intensive Family Support.
Child In Need	Level 4	...is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services. The child's health or development is likely to be significantly impaired, or further impaired without the provision of additional services; or the child is disabled.	As the child and family's issues continue to escalate or if interventions are not working and it is felt that the needs cannot be met without the intervention of social care.  There should be a sound record of interventions and support offered previously by services to highlight why social intervention is required.	Child and Family Assessment.  Referring agency to complete referral.
Child Protection	Level 5	...is at risk of or suffering significant harm and is in need of help and protection. Has a high level of unmet and complex needs requiring statutory interventions.	These children require immediate social care intervention to ensure continued safety and positive development and to prevent significant harm. This may lead to them becoming subject to a Multi-Agency Child Protection (CP) Plan or becoming Looked After. Any child subject to a CP Plan or Looked After will have social care intervention already in place.	Child and Family Assessment.  Referring agency to complete referral.

## **Appendix 10 Trafford Children Social Care Protocol of Assessment**

[https://www.proceduresonline.com/trafford/cs/chapters/p\\_assessment.html](https://www.proceduresonline.com/trafford/cs/chapters/p_assessment.html)

## **Appendix 11 Trafford Multi- Agency Safeguarding Arrangements**

[TSSB-multiagency-arrangements \(traffordsafeguardingpartnership.org.uk\)](https://traffordsafeguardingpartnership.org.uk/TSSB-multiagency-arrangements)

## **Appendix 12 – Safe Lives Risk Identification Checklist for the identification of high risk cases of domestic abuse, stalking and 'honour'-based violence: Young People's Version with practice guidance**



YP RIC guidance  
FINAL (1).pdf

## **Appendix 13 – Trafford Guide to Domestic Abuse Support Services**



Trafford DA Services  
(3).pdf

## **Appendix 14 – Virtual School Guidance**

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/keeping-children-safe-in-education-2023)

[Promoting the education of looked-after children and previously looked-after children \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/promoting-the-education-of-looked-after-children-and-previously-looked-after-children)

[Designated teacher for looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/designated-teacher-for-looked-after-and-previously-looked-after-children)

## Appendix 15 Operation Encompass Flowchart

