



*'Enjoy, Aim High, Achieve!'*

# **Child Protection Policy and Procedures**

Revised: September 2021

# ***‘Enjoy, Aim High, Achieve!’***

**Our Key Values:** our school motto is ‘Enjoy, Aim High and Achieve!’ through kindness, respect, friendship, equality and courage.

We ensure that every child has access to a broad, balanced and supportive curriculum. Through this we are able to give our pupils a range of opportunities and experiences to grow and develop academically, physically socially and morally.

## **Our School Vision:**

At Heaton Park Primary School we aim high. We want every part of our school community- pupils, parents and members of staff to experience success. Heaton Park Primary School will work with everyone to create a happy, safe and stimulating setting where children are motivated to learn together. By maintaining high expectations of ourselves and each other, our children will be equipped to encounter opportunities and challenges with resilience and determination. We encourage a curiosity about the world and strive to ensure that our children will contribute positively, now and in the future.

## School Details

Head teacher:	Mr.P.Lord
Designated Safeguarding Lead:	Mrs.J. Kirkwood
Deputy Designated Safeguarding Lead(s):	Mr.P. Ridley Mrs K Heys
Designated Teacher for LAC:	Ms L Cooper
Pastoral Lead:	Mrs E. Read
Link Governor for Safeguarding:	Mrs H. Mckee
Chair of Governors:	Mr A. Vogt
Policy Date:	September 2021
Policy Status:	Statutory
Policy Review Cycle:	Annual
Next Review Date:	September 2022

This policy provides guidance to all adults working within the school whether paid or voluntary.

***This policy should be read alongside Part 1 and Annex B of Keeping Children Safe in Education 2021.***

### 1. Introduction

Through this policy we aim to create and maintain a safe learning environment and culture where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

This policy has been developed to ensure that **all adults** in our school are working together to safeguard and promote the welfare of children and young people and to identify and address any safeguarding concerns and to ensure consistent good practice.

As part of our safeguarding ethos, we encourage children to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We will ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils, reasonably practicable steps will be taken to offer a balanced presentation of opposing views to pupils. We will ensure that reasonable steps are taken to ensure visitors to the school do not share messages with the school community which are contrary to our school ethos and beliefs.

At Heaton Park Primary School we adopt a **'child-centred'** approach and we have a culture where **'safeguarding is everyone's responsibility'**.

## 2. Child Protection Statement

Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The school seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

*'Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is **child-centred**. This means that they should consider, at all times, what is in the **best interests** of the child.'* (DFE 2021)

## 3. Definitions

### **Child:**

A child includes everyone under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

### **Child Protection:**

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child.

### **Abuse:**

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

### **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.

**Emotional Abuse:**

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

**Neglect:**

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

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

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

**Sexual Abuse:**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

Further information regarding the signs and indicators of abuse are set out in the DfE guidance Keeping Children Safe in Education (DfE 2021).

At Heaton Park Primary the definitions and indicators of Child Sexual Exploitation, Child Criminal Exploitation (including County Lines), Serious Violence, Female Genital Mutilation, Forced Marriage, Honour Based Abuse, Peer on Peer abuse, Sexual Violence and Sexual Harassment (including sexting), Vulnerabilities to Extremism and Children Missing Education are addressed in numerous ways, this includes lessons with content provided by safe sources, displays around school, staff training throughout the year. The Safeguarding Team share updates in regular meetings.

#### 4. Policy Aims

- To ensure school takes appropriate action, in a timely manner, to safeguard and promote the welfare of all children
- To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.
- To ensure that the school's practice meets local and national guidance and all statutory requirements are in place.

#### 5. Key Principles

- The child's needs and welfare are paramount. All children have a right to be protected from abuse and neglect and have their welfare safeguarded.
- Keeping Children Safe in Education (DfE 2021) reminds us that all staff should maintain an attitude of *"it could happen here"* where safeguarding is concerned.
- Children should be listened to and their views and wishes should inform any assessment and provision for them. Staff should always act in the interests of the child, in order to protect them.
- The school recognises that scrutiny, challenge and supervision are key to safeguarding children.
- The school is committed to working with other agencies to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment. *'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.'* (DfE 2021)
- All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment.
- *'All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.'* (DFE 2021)
- All staff have responsibility to report their concerns about a child **without delay** to the Designated Safeguarding Lead, or in their absence the deputy designated safeguarding lead(s) or other senior member of staff. This should be done both verbally and in writing, using the agreed format. Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, **anyone** can refer their concerns to children's social care directly in emergencies or if they feel they need to do

so. Bury's Multi-Agency Safeguarding Hub (**MASH**) can support any member of staff through the process of making a referral.

- Everyone has responsibility to escalate their concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. Concerns about a child should always lead to help for a child at some point and the child's situation should improve.
- The school will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child in order to safeguard them. *'Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.'* Working Together to Safeguard Children (DfE 2018)
- The school will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The school will follow the Local Authority and the Local Safeguarding Children Partnership procedures and provide them with information as required.
- Support staff, children and families through child protection processes.
- Children have a right to learn ways to keep themselves safe from harm and exploitation.

## 6. Legislation and Guidance

Schools and colleges must have regard for the DfE statutory guidance '[Keeping Children Safe in Education](#)' (DfE 2021). **This child protection policy should be read alongside this statutory guidance and all staff must read and understand at least part 1 and annex B of this guidance.**

Local authorities have a duty to make enquiries under [section 47](#) of the **Children Act 1989** if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out.

A 'child in need' is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled. A social worker will lead and co-ordinate any assessment under [section 17](#) of the Children Act 1989.

[Section 175](#) of the **Education Act 2002** places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions.

[Working Together to Safeguard Children](#) (DfE 2018) provides additional guidance which makes it clear that protecting children from harm and promoting their welfare depends upon a shared responsibility and effective joint working between different agencies:

*Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.*

In addition, Working Together to Safeguard Children also reinforces the need to take action to provide early help before statutory services are required:

*'Providing early help is more effective in promoting the welfare of children than reacting later. 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.'* DfE 2018

The school therefore understands its responsibility to engage with other professionals in Early Help Assessments.

**The Counter-Terrorism and Security Act 2015** places a duty upon local authorities and educational providers to 'have due regard to the need to prevent people from being drawn into terrorism'. The DfE has provided statutory guidance for schools and child care providers: '[The Prevent Duty](#)' (June 2015). The guidance summarises the requirements of schools and child care providers in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Our school will ensure that staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral via Children's Services to the Channel programme. Equally children will be made aware of the risks and support available to them. We will ensure that children are safe from terrorist and extremist material when accessing the internet in school. The Government has developed an 'educate against hate' website providing information and resources for schools and parents to support them to recognise and address extremism and radicalisation in young people.

**'Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)** places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all

professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:

[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

*Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. DFE 2021*

The school will also consult the government guidance [Multi-agency statutory guidance on female genital mutilation](#) (revised 2016) and will have reference to guidance provided by the National FGM Centre [FGM Schools Guidance - National FGM Centre](#).

In addition, the school recognises the important role schools have in safeguarding children from Forced Marriage. (The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk).)

Early years providers have a duty under section 40 of the **Childcare Act 2006** to comply with the welfare requirements of the [Statutory Framework for the Early Years Foundation Stage](#).

The [Teachers' Standards](#) (DfE 2013) also requires all teachers to 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, including:

- treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others'

In addition, the **Sexual Offences Act 2003** makes it clear that all members of staff are in a position of trust and would therefore be committing a criminal offence to have a sexual relationship with a young person below the age of 18, even if that pupil is over the age of consent. In addition, it would be a breach of trust to have a relationship with any school student over the age of 18.

**The school and this policy also takes account of additional DFE guidance including:**

- [CSE Definition and guidance for practitioners](#) DFE 2017
- [Criminal Exploitation of children and vulnerable adults: County Lines Guidance](#) DFE 2017
- [Disqualification under the Childcare Act](#) DFE 2006
- [Information sharing: Advice for practitioners providing safeguarding services](#) HMG 2018
- [Sexual violence and sexual harassment between children in schools and colleges](#) DFE 2021
- [The Prevent Duty - Departmental advice for schools and childcare providers](#) DFE 2015
- [How social media is used to encourage travel to Syria and Iraq](#) DFE 2015 (Briefing note for schools)
- The [Ofsted School Inspection Handbook](#) and Ofsted guidance: [Inspecting safeguarding in early years, education and skills](#)
- [What to do if you are worried a child is being abused: Advice for practitioners](#) DFE 2015
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) DDCMS / UKCIS 2020
- Other DFE statutory guidance including: online safety and children who go missing from home or care which is found here: <https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

Additional DFE/Gov guidance can be found here:

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

## **7. Communicating with parents and visitors**

The school is committed to the principles of Working Together to Safeguard Children which states that a '*child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.*'

The following statement is shared with parents/carers so they are aware of the school's responsibilities:

*'The school ensures children learn in a safe, caring and enriching environment. Children are taught how to keep themselves safe identify risky, unsafe or problematic situations, how and when to seek help, how to develop positive and healthy relationships and how to avoid situations where they might be at risk including by being exploited.*

*The school also has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Schools are not able to investigate child protection concerns but have a legal duty to refer them. In most instances the school will be able to inform the parents/carers of its need to make a referral. However,*

*sometimes the school can in certain circumstances share information without the consent of the family and may be advised by children's services or police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The school follows legislation that aims to act in the interests of the child.*

*The school will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child and family'*

The following notice is made available to all visitors in reception. In addition, all visitors are provided with additional safeguarding guidance.

*Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. We would expect you to also report to the headteacher or Designated Safeguarding Lead any behaviours of any adults working in the school that may concern you. By signing in as a visitor you are agreeing to follow the school's Child Protection and Safeguarding Procedures as outlined in our visitors leaflet.*

The names and photographs of the Designated Safeguarding Lead and those who deputise for them are displayed in reception and the staffroom, you can also find safeguarding information on our school website <https://heatonparkprimary.co.uk/>

## **8. Roles and responsibilities**

**The Head Teacher is:** Mr P. Lord

**The Chair of Governors is:** Mr.A. Vogt

**The Designated Safeguarding Lead for Child Protection is:** Mrs J. Kirkwood

**Those trained to provide cover for the role of Designated Safeguarding Lead are:** Mr P Ridley and Mrs K Heys.

**The Designated Teacher for LAC is:** Ms L Cooper

**The nominated Link Safeguarding / Child Protection Governor is:** Mrs H McKee

**The nominated governor for dealing with allegations against the Head Teacher is:** Mr.A Vogt

We also have a **Pastoral Team** which consists of a qualified *Trauma Informed and Mental Health Practitioner*, these are:

Mrs E Read and Mrs D Foster.

### **All staff (and volunteers) should:**

- Contribute to ensuring students learn in a safe environment.
- Maintain the belief that *'it could happen here'*.
- Read and understand as a minimum Part 1 and Annex B of the DFE (2021) guidance Keeping Children Safe in Education and engage in training which enables them to identify children who may need additional help or who are suffering or likely to suffer significant harm and take appropriate action. Staff should have an understanding of the specific safeguarding issues outlined in part 1 and Annex B of the DFE (2021) guidance Keeping Children Safe e.g. fabricated or induced illnesses, faith abuse. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truancy and sexting can put children in danger. Staff should be alert to the signs of peer on peer abuse and take appropriate action.
- Recognise that any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
  - is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory education, health and care plan)
  - is a young carer
  - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is misusing drugs or alcohol themselves
  - is at risk of modern slavery, trafficking or exploitation
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems and domestic abuse
  - has returned home to their family from care
  - is showing early signs of abuse and/or neglect
  - is at risk of being radicalised or exploited
  - is a privately fostered child
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside of their family home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Understand that where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood,

adolescence and into adulthood. All staff should be aware of how these experiences can impact on a child's mental health, behaviour and education.

- Understand that all staff play an important part in working to prevent sexual harassment, online sexual abuse and sexual violence between children. Staff will assume that these behaviours are happening in our school and will work as part of a whole school approach to address such issues, including via the curriculum. Staff will understand how to handle reports of sexual violence or harassment.
- Staff must ensure that they appropriately challenge any form of derogatory and sexualised language or behaviour to ensure that everyone is respectful at all times.

*All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.*

- Report any concerns about a child's welfare without delay to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead or in their absence a senior member of staff.
- Ensure that they record their concerns using the school's agreed reporting procedure which is CPOMS, as soon as possible and after alerting the DSL immediately. Records will note the difference between fact and opinion. The child's voice will be made clearly evident.
- Ensure that concerns relating to children remain confidential and are only shared with the appropriate safeguarding staff.
- Understand that any member of staff can make a referral to children's services should that be required, informing the Designated Safeguarding Lead of any action taken.
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if a child remains at risk or their needs are not met or if it appears that the school is not taking effective action in line with expected procedures. This includes the understanding that any member of staff can make a referral to Children's Services if required to do.
- Teachers and those providing teaching **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- Be aware safeguarding issues can manifest themselves via peer on peer abuse.
- Understand that it may be appropriate to discuss with the Head teacher matters outside of work, which may have implications for the safeguarding of children in the workplace. This includes information about themselves. Staff will ensure that they are aware of the circumstances where this would be applicable.
- Report any concerns (including those which might be considered to be low level concerns) without delay about the behaviour of an adult towards a child to the Head Teacher, Designated Safeguarding Lead, Chair of Governors or if required the Local Authority Designated Officer for Allegations against Staff.
- Follow the school's policies including this child protection policy and the school's code of conduct for adults and the [Guidance for Safer Working Practices for Adults Working with Children](#) (2019)

- Understand the circumstances where it may be necessary to ‘self-report’ incidents where they could have found themselves in a situation which could be misinterpreted, or may appear compromising to others, or if they have behaved in a manner which, on reflection, they consider to fall below the standards set out within the code of conduct for staff.
- Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in or out of school or online), may impact on their work with children.
- Be aware that if their role is within the scope of the Childcare Act 2006 and they commit a relevant offence that would appear on their DBS certificate or they become disqualified under the Childcare Act 2006, then they must inform their head teacher.
- Be aware that they should inform their head teacher of any cautions, convictions or relevant order accrued during their employment, and/or if they are charged with a criminal offence.
- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse.

*‘Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This can include:*

- *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;*
- *these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;*
- *children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and*
- *the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and*
- *communication barriers and difficulties in overcoming these barriers.’ (DFE 2021)*

The DFE has provided additional practice guidance ‘[Safeguarding Disabled Children](#)’ DFE 2009.

- Have access to the school’s managing allegations against adults procedures and whistle blowing policy. In addition, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Have access to [What to do if you are worried a child is being abused 2015: Advice for practitioners](#) DFE 2015
- Understand that any indication of failure to follow any of the procedures set out within this policy will led to a formal investigation by the school.

### **The Governing Body should ensure that:**

- The school meets the statutory responsibilities set out in Keeping Children Safe in Education (DFE 2021) and Working Together to Safeguard Children (DFE 2018).
- The school has a strategy for providing early help together with other agencies and supporting children and families by carrying out early help assessments (including Team Around the School and Story So Far)

- The child protection policy is reviewed at least annually by the full governing body and available to parents, normally via the school's website.
- All adults working within the school are aware of the school's code of conduct.
- The school's practice is reviewed in line with Local Authority guidance and procedures and any actions identified in the Local Authority 175 Audit are completed.
- There is a named Designated Safeguarding Lead who is a member of the school leadership team. Governors will ensure that this person has the appropriate status and authority within the school to carry out the duties of the post. They 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, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. There are colleagues trained to provide cover for the role.
- The school has procedures in keeping with the Local Authority for dealing with any allegations made against any adult working within the school.
- There is a nominated governor, usually the chair, who is the case manager for managing any allegations against the Head Teacher.
- There is an additional nominated safeguarding governor to liaise with the Designated Safeguarding Lead and champion child protection/safeguarding on behalf of the safeguarding body.
- The school follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with young people. The Chair of Governors and safeguarding governor together with the headteacher review the school's single central record.
- The school itself is a safe environment where the views of children and families are listened to and where children are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.
- Ensure the school audits the health and safety of the school environment and any actions arising from the audit are addressed.
- The school will ensure there are appropriate filters and monitoring systems in place in respect of internet use and encourage safe and responsible use of new technologies.
- It scrutinises the impact of the school's training strategy so that all staff, including temporary staff and volunteers, are aware of the school's child protection procedures. All staff must have child protection training which is regularly updated and forms part of an integrated, aligned training programme which is considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training.
- The governors are given guidance to support them to ensure the school meets its statutory safeguarding requirements.
- All safeguarding practices are quality assured by the leadership team, including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team.
- The governing body will appoint an appropriately trained designated teacher to promote the educational achievement of children who are looked after, or have been previously looked after.

- There are clear systems and processes in place to identify and respond to issues of sexual violence or harassment between children, including a sequenced curriculum designed to specifically address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way.

Governing bodies are accountable for ensuring the school has effective policies and procedures in place in line with local and national guidance, and for monitoring the school's compliance with them. Neither the Governing Body nor individual governors have a role in dealing with individual child protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

**The Head Teacher will ensure that:**

- The Single Central Record is up to date and the safer recruitment practices set out in Keeping Children Safe in Education (DFE 2021) are followed in line with the school's Safer Recruitment Policy and Procedures. At least one member of every recruitment panel has attended safer recruitment training.
- Job descriptions and person specifications for all roles make specific reference to child protection and safeguarding.
- There is a listening culture within the school where both staff and children are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service and/or the Teaching Regulation Agency as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- They liaise with the designated safeguarding lead in respect of any concerns raised about staff or volunteers which do not meet the harm threshold and are dealt with by means of the low level concerns policy or procedure.
- The Designated Safeguarding Lead has a job description in keeping with the requirements of Keeping Children Safe in Education (DFE 2021) and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead who have undertaken the same training and who also have the role explicitly referenced within their job description.
- The curriculum provides opportunities to help students stay safe especially when on-line. Children should be aware of the support available to them.
- The RSHE / PSHE / safeguarding curriculum is appropriately sequenced to ensure children are taught about key issues in a planned and age/stage appropriate way, building on previously knowledge as they move through the school.
- They quality assure the school's child protection practices including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.

- The school meets its responsibilities under the Prevent Duty including ensuring there are reasonable checks are made on visiting speakers and monitoring and filtering is in place across the school's IT systems. All staff have had opportunity for Prevent training either through face to face training or access to online resources:

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

### **The Designated Safeguarding Lead:**

The Designated Safeguarding Lead will be a senior member of staff from the school's leadership team and the role will be explicit within their job description. The school will also appoint a deputy designated lead(s) who will be trained to the same level as the designated safeguarding lead and the role will also be explicit within their job description, however the lead responsibility remains with the designated safeguarding lead.

Keeping Children Safe in Education 2021 sets out the broad areas of responsibility for the Designated Safeguarding Lead. These are detailed below.

### **Manage referrals**

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required. The NPCC document [When to call the police](#) can support with this.

### **Work with others**

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral team, school nurse, IT coordinator and SEND coordinator on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the school's Pastoral Lead, where safeguarding concerns are linked to mental health;

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
  - ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes; and
- act as a source of support, advice and expertise for all staff.

### **Undertake training**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND) and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.

- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Raise Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff; ensure the school's child protection policies are known, understood and used appropriately
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and leadership staff. Their role could include ensuring that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## **Providing support to staff**

Training will support the designated safeguarding lead in developing expertise so that they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## **Understanding the views of children**

Understanding the views of children is essential to respond appropriately to their needs. It is important that children feel heard and understood. The designated safeguarding lead will be supported in developing knowledge and skills to:

- encourage a culture of listening and taking account of children's wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusting relationships which facilitate communication.

## **Holding and sharing information**

The designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## **Child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information is kept confidential and stored securely. Records include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome. Files are only accessed by those who need to see it and any sharing of information happens in line with information sharing advice set out in Keeping Children Safe in Education.

Where children leave the school (including for in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and SENCOs, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving to help them put in place the right support to safeguard the child and help the child thrive in the new setting. A lack of information about a child's circumstances can impact on the child's safety, welfare and educational outcomes. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns.

The designated safeguarding lead will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

**In addition to the role outlined in Keeping Children Safe the Designated Safeguarding Lead is also expected to ensure that:**

- The social worker is notified if a child subject to a child protection plan is absent without explanation.
- The social worker is informed when a child subject to a child protection plan or a child in need plan moves to a new setting.

## **9. Safeguarding Framework**

In addition to this child protection policy the school has procedures or policies in relation to other areas for safeguarding children including as examples:

- attendance
- anti-bullying including cyber bullying
- behaviour for learning
- code of conduct for staff, governors and volunteers (guidance on safer working practices)
- data protection
- disability objectives and accessibility plan
- equal opportunities
- evacuation and lock-down procedures

- first aid – including administering medicines
- intimate care
- managing allegations against staff and volunteers
- on-line safety
- risk assessments
- safeguarding advice for visitors
- school and site security
- sex and relationships education
- special educational needs and disabilities
- taking and using photographs
- whistle-blowing

## **10. Training and Induction**

All staff and volunteers working in the school must be given a copy of the Child Protection policy immediately upon starting work at the school as part of their induction. All staff and volunteers working in the school must complete safeguarding training appropriate to their role as part of their induction and at a minimum of annually thereafter. As part of the requirement for all staff to undergo regular updated safeguarding training (including online safety), safeguarding training will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Designated Safeguarding Lead and deputies must complete safeguarding training relevant to their role. This level of training must be refreshed at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis as best practice. This is to ensure designated staff have appropriate, up to date knowledge and skills which will enable them to identify concerns and make decisions that support the safety of the school community.

The Governing Body should undergo Safeguarding training specific to their role and responsibilities. The Link Governor for Safeguarding should attend appropriate training to enable them to fulfil the expectations of the role.

All staff have had opportunity for Prevent training either through face to face training or access to online resources: <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

The school will keep a safeguarding training log evidencing the training attended by the different groups of staff/governors and will seek to evidence the ongoing impact of this training.

## **11. Procedures for reporting child protection or child welfare concerns:**

- All members of the school community have a statutory duty to safeguard and promote the welfare of children and young people. Staff and governors should not investigate possible abuse or neglect themselves.
- All concerns should be reported without delay directly to the Designated Safeguarding Lead, Designated Safeguarding Deputies, Head Teacher or any member of the School Leadership Team. This should be followed by a written account of the concerns completed on the school's agreed Child Protection/Child Welfare Incident Form which is CPOMS.
- Consideration will need to be given to immediately protecting the child.
- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will take immediate action and will make a referral to children's services by telephone if a child is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing.
- Children's Services contact details are as follows:

### **Children's Social Care:**

**MASH:** Multi-Agency Safeguarding Hub: 0161-253-5678 (8:45 – 4:45pm)

**Emergency Duty Team:** 0161-253-6606 (Out of Office hours)

**Initial Response Team (IRT):** 0161-253-5454 (for those already open to a Social Worker)

**Safeguarding Team (SGT):** 0161-253-6868 (for those already open to a Social Worker)

**Complex Safeguarding Team:** Contact MASH as above

**Care and Support Service (CASS):** 0161-253-6666 (for those open to a Social Worker)

### **Early Help Hub:**

**Whitefield Locality Team (including Prestwich)** Telephone: 0161 253 5077

- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will follow the Local Authority multi-agency procedures and consider the child's needs (alongside the LA's Levels of Needs) and consider whether an early help assessment or referral to children's services is needed.
- Concerns about a child should always lead to help for a child. The school may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed.
- If school does not receive feedback within one working day regarding the outcome of a referral made to Children's Services, the Designated Safeguarding Lead will contact Children's Services immediately to determine the outcome of the referral.

## **12. Process to follow if a child makes a disclosure**

If a child makes a disclosure of abuse, staff should:

- Listen and keep calm. Do not interrupt
- Not promise the child that they will keep the matter confidential. Explain to the child who they will need to tell and why
- Observe visible bruises and marks, but should not ask a child to remove or adjust their clothing to view them
- Keep questions to a minimum as their role is not to investigate. If staff need to ask questions in order to ascertain whether this is a safeguarding concern, they should ensure they are open questions
- Use the “TED” model for asking open ended questions: “Tell me about that”, “Explain that to me”, “Describe that”
- Make a record of what has been said immediately afterwards in words used by the child and the member of staff to the best of their memory. Use capital letters for the child’s words to help distinguish between the two.
- Note anything about the child which is connected i.e. any visible injuries including the position and description, the demeanor of the child i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third party information
- Report the matter immediately to the Designated Safeguarding Lead
- Seek advice from the Designated Safeguarding Lead if in doubt

Staff **should not**:

- Ask leading questions, put words into the child’s mouth or press for details
- Rush the child
- Examine the child
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with the Designated Safeguarding Lead

## **13. Confidentiality, information sharing, record transfer and record keeping and retention**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children’s welfare, including their education outcomes. Schools have clear powers to share, hold and use information for these purposes.

The school recognises that all matters relating to child protection are confidential. The Head teacher, Designated Safeguarding Lead and/or Deputy will disclose any information about a child to other members of staff on a ‘need to know basis’ only. Guidance about sharing information can be found

in the 2018 document [Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018](#) and the [Data protection: toolkit for schools](#). The school understands the need to keep child protection and safeguarding records securely. At Heaton Park Primary the Child Protection files are kept in a password protected online system called CPOMS.

Staff cannot promise children confidentiality but must always act in the best interests of the child and share disclosures made by the child or others with the Designated Safeguarding Lead. All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

The school will aim to seek consent of parents before sharing information with other agencies, however legislation states that schools and other agencies can share information without the consent of a parent/carer in particular circumstances.

The school pays due regard to the relevant data protection principles which allow us to share personal information, as provided for in the [Data Protection Act 2018](#) and the [General Data Protection Regulation](#) (GDPR). The school is aware of the processing conditions under the Data Protection Act 2018 and the GDPR which allow school to store and share information for safeguarding purposes, including information which is sensitive and personal, and this is treated as 'special category personal data'. Where school would need to share special category personal data, we are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows us to share information.

*'The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children' (DfE 2021)*

The school will transfer records securely to the next setting and discuss the child's needs before the child starts at the next setting. The Designated Safeguarding Lead will speak to their counterpart in the school to which the child is transferring in order to ensure that they are aware that the file is to be transferred. Upon confirmation of the child starting on roll the file should be transferred as soon as possible. The file should be signed upon receipt, and delivered by hand wherever possible.

#### **14. Managing allegations against adults (including all staff, supply teachers and volunteers) working at the school**

All school staff and other adults working at the school will be aware of and work within the school's Code of Conduct and other relevant policies and procedures. The Staff Code of Conduct includes guidance for staff regarding the school expectations of the use of mobile phones, electronic equipment and social media.

All staff and volunteers must report any concerns about a member of staff's behaviour towards children (including supply staff and volunteers) to the Headteacher who will act as the case manager. Concerns can also be discussed with the Designated Safeguarding Lead. Concerns about the headteacher should be raised with Chair of Governors.

Local Authority procedures will be followed in all cases where it is alleged that a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The school's managing allegations against staff and volunteers policy and procedures will support everyone to take appropriate action.

In some circumstances, the school will have to consider an allegation against an individual who is not directly employed by the organisation and where our disciplinary procedures do not fully apply (for example supply teachers). Whilst the school is not the employer of the individual, we still have responsibility to ensure allegations are dealt with properly and will liaise where appropriate with relevant parties.

Concerns can also be taken directly to the Local Authority Designated Officer (L.A.D.O.) Mark Gay – 0161-253-6168/ 07583877250

[LADO@bury.gov.uk](mailto:LADO@bury.gov.uk) if needed, via Children's Services.

There are occasions when a person who works with children behaves in a way that is concerning and raises questions about their ability to recognise and take steps to safeguard children in their care that may not always meet the threshold of LADO. As an employer the school has a duty to consider whether the issue indicates that they are unsuitable to continue in their role for the immediate future or indefinitely. These are known as issues of suitability and if not being dealt with under the managing allegations procedures, would be dealt with via the school's disciplinary procedures. Issues of suitability can include:

- Where an employee is being investigated for an offence against an adult, or
- Their behaviour in their personal lives brings into question their suitability to work with children

However if an adult who works with children has involvement from Children's Services in respect of their own child, or a child that they live with or have contact with, it is the responsibility of Children's Services to assess the immediate concern and inform the LADO of whether the adult poses a risk to children. Examples of this may include:

- Allegations of assault, physical or emotional, on their own child or on a child they live with or have contact with
- Domestic abuse
- Substance misuse
- Lives with or is in a relationship with a person who is identified as a risk to children

The situation would meet the threshold of LADO should the child in question be made subject to a Child Protection plan. This is because Children's Services has determined that the adult presents a risk to the associated child either directly or due to a failure to protect.

If school are made aware of any of the circumstances detailed above, they will have a consultation with the LADO in order to determine whether the threshold is met for a referral under the managing allegations process.

All staff should ensure that they disclose information about themselves relating to the above to the Head teacher as soon as possible. School will create an environment and culture where staff are supported and empowered to be able to do this.

## **15. Low Level Concerns**

Our school recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold as set out in section 14 of this policy. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:

- suspicion, complaint or disclosure made by a child, parent or other adult within or outside of our school; or
- as a result of vetting checks undertaken during recruitment

Our school promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the right person, and are recorded and dealt with appropriately is critical to effective safeguarding practice. This culture enables the school to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or on behalf of the school are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity.

The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out in section 14 of this policy and part 4 of Keeping Children Safe in Education 2021. A low level concern is any concern (no matter how small,

and even if no more than causing a sense of unease) that an adult working in or on behalf of the school may have acted in a way that:

- is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or
- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate, intimidating or offensive language.

Behaviours which are not consistent with the standards and values of our school, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is essential that concerns such as this are shared responsibly and with the right person, and that they are recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations of misunderstandings. Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem, however it is never too late to share a concern.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider to fall below the standards set out within our code of conduct for staff. Self-reporting such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.

Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations policy. Staff must simply be empowered to share their concern. The determination regarding process will be made by the designated safeguarding lead and headteacher.

Low level concerns should be reported to the Head teacher and Designated Safeguarding Lead in the absence of the Head teacher. Where a low level concern is in relation to the designated safeguarding lead, it should be shared with the headteacher. Where a low level concern is in relation to the headteacher, it should be shared with the Chair of Governors or LADO.

If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the Head teacher should collect as much evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may need to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

All low level concerns will be recorded by the Head teacher and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. Records must be kept confidential and held securely in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be kept in individual personnel files and will be retained for the duration of the individual's employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, school 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, referral to LADO.

Low level concerns will not be included in references unless they relate to an issue which would normally be included in a reference. Paragraph 423 of Keeping Children Safe in Education specifies: *"However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference."*

#### **16. Allegations of abuse against another student (peer on peer / child on child abuse), including issues of sexual violence and harassment**

**At Heaton Park Primary, all staff must follow Child Protection Procedures for managing allegations of abuse against another student, including sexual violence and sexual harassment.**

**All staff will report their observations to a member of the safeguarding team without delay and then follow this up with a report on CPOMS.**

**Staff will follow the safeguarding procedures as with any disclosure.**

Heaton Park Primary has many different avenues in which we explore with children their rights to feel safe and ways in which to talk about this such as telling an adult, I wish my teacher knew, I wish someone knew boxes etc.

- Each incident will be treated on a case-by-case basis, including any use of sanctions
- Heaton Park Primary will report concerns and work in collaboration with external agencies and the police if deemed necessary
- Heaton Park Primary will seek advice on completing any relevant risk assessments

- Heaton Park Primary PSHE/RSHE curriculum proactively responds to preventing such issues from occurring and addresses incidents should they arise.
- The safeguarding team respond to incidents and take a proactive approach in terms of training staff to raise awareness.

Staff should recognise that children are capable of abusing their peers, and that not all children will find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting an incident and they will never be made to feel ashamed or their experience minimised.

*The DFE states 'The school's or college's initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.'*

Staff must act on the assumption that children may be experiencing sexual violence or harassment, even if there are no specific reports of such behaviour. Staff must ensure that they challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. Behaviours by children should never be passed off as 'banter', 'having a laugh' or 'part of growing up' as this can lead to an unsafe culture which normalises abuse and inappropriate behaviours and can lead to children accepting it as normal and therefore not reporting such issues.

Our school will prevent sexual harassment, online sexual abuse and sexual violence through a carefully planned and sequenced relationships, sex and health education curriculum alongside effective challenge and response to specific issues when they arise. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe.

All concerns must be reported and discussed with the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or senior member of staff. Behaviours can happen in school, online or in the community and are most likely to include, but not limited to:

- abuse within intimate personal relationships between peers;
- bullying (including cyber bullying, prejudice-based and discriminatory bullying);
- serious violence;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual sharing of nudes and semi-nude images or videos;

- upskirting, which typically involves taking a picture under a person’s clothing without their permission;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; and
- sexting and 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 many also include an online element).

Children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. Children who are LGBT+ or perceived to be, may also be targeted by their peers and harassed or assaulted.

Victims of peer on peer harm will be supported by the school’s pastoral team and referred to specialist agencies when needed. A risk assessment may need to be in place. The school curriculum will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including ‘sexting’ or ‘initiation/hazing’ behaviours.

Additional guidance is available on the NSPCC website:

<https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>

## **17. Children at risk of Serious Violence and/or Child Criminal or Sexual Exploitation**

All staff should be aware of the indicators which may suggest a child is at risk from, or is involved with serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self harm or a significant change in wellbeing; or
- Signs of assault or unexplained injuries

Unexplained gifts of new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced abuse or neglect and having been involved in offending such as theft or robbery. Additional advice can be found in the Home Office’s [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

Both child sexual exploitation and child criminal exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victims needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Child sexual exploitation and child criminal exploitation can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Staff will understand that whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

All staff should be aware of the indicators which may suggest a child is at risk from or experiencing child criminal or sexual exploitation. These may include:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late and are found in areas away from their home;
- are found in accommodation that they have no connection with; and
- regularly miss school or education or do not take part in education.

All staff will be aware that children who are involved in criminal exploitation often commit crimes themselves, therefore their vulnerability as victims is not always recognised by adults and professionals. They may still have been exploited even if the activity appears to be something they have agreed or consented to. Staff will also have an understanding of the fact that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff will be aware that child sexual exploitation is child sexual abuse. Exploitation of this nature can be a one off occurrence and may happen without the child's immediate knowledge e.g. through the sharing of videos or images. It can also affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. because they believe they are in a genuine relationship.

Our school understands that children who have been exploited or are at risk of serious violence, will need additional support to help maintain them in education.

## **18. Online safety, data protection and the use of mobile phones and digital photographic equipment**

At Heaton Park Primary mobile phones should be locked away or out of sight at all times during the school day apart from staff break and lunchtimes. When being used at these times this should not be when any children are present.

Heaton Park Primary have staff IPADS therefore no recording of children including videos or images are taken with a personal mobile phone.

Staff are informed of the school Code OF Conduct annually and have informal reminders throughout staff meetings.

All staff receive a hard copy of the Code of conduct, it is on the Safeguarding noticeboard in the staffroom and is also on the staff shared drive.

No staff member is allowed to accept a friend request or follow a child who attends Heaton Park Primary. Staff have school twitter accounts which are only to contain information with regards to school.

It is a staff member's responsibility to ensure that their security settings for all of their social media accounts are set to the highest security setting.

Any inappropriate contact found on a staff members social media account will be reported to the Head Teacher or the Chair of Governors immediately.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our school implements a whole school approach to online safety sets out to protect and educate both children and staff in their use of technology alongside establishing mechanisms to identify, intervene in and escalate any concerns, recognising that many children have unlimited and unrestricted access to the internet via mobile phone networks.

Staff should also report any concerns about sexting (youth produced sexual imagery or 'nudes') to the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or senior member of staff who will follow the guidance in [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (UK Council for Child Internet Safety, December 2020). This document provides clarity as to how staff should respond to these incidents.

The school's Online/E-safety/Acceptable Use policy clearly outlines the way in which the school uses technology and the measures in place to ensure safe, responsible and respectful use by all. There is a clear code of conduct for staff and volunteers which sets out the use of new technologies, mobile phones and personal photographic equipment around children. The school will consider, in particular, Looked after Children (Children in Care) who might be put at risk by being included in publicity materials or school photographs.

The DfE highlights the risks of new technologies:

*An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:*

- *content: being exposed to illegal, inappropriate or harmful content*
- *contact: being subjected to harmful online interaction with other users*
- *conduct: personal online behaviour that increases the likelihood of, or causes, harm*
- *commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams'*

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, criminal exploitation, radicalisation and sexual abuse. Technology often provides the platform that facilitates harm.

School will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Staff should bring immediately to the attention of the Headteacher, Designated Safeguarding Lead or senior leadership team any behaviours by adults or children themselves that may be risky or harmful.

Annex D of Keeping Children Safe in Education provides schools with further key information and guidance.

The DfE guidance "Teaching Online Safety in Schools" (2019) also outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements [www.gov.uk/government/publications/teaching-online-safety-in-schools](http://www.gov.uk/government/publications/teaching-online-safety-in-schools).

Where children are asked to learn online at home (e.g. under the Provision of Remote Education Continuity Direction (October 2020)), our school ensures this is done safely by referencing key guidance such as [safeguarding in schools colleges and other providers](#), [safeguarding and remote education](#) and advice from the [London Grid for Learning](#).

## **19. Children requiring mental health support**

Our school recognises that it has an important role to play in supporting the mental health and wellbeing of our students. We are a 'Trauma Informed School' with teaching and non-teaching staff accessing training to understand the long term impact of trauma. We also recognise that in some cases, mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. The designated safeguarding lead will regularly liaise with the pastoral lead where safeguarding concerns are linked to mental health to ensure there is an effective and appropriate response by school. Within our school we adopt a whole school approach to mental health and wellbeing, which includes promoting positive mental health, wellbeing and resilience across the whole school community.

Children are supported through 1-1 interventions, group work and referrals into specialised agencies when identified. Discussions and consents with parents and carers are sought to ensure effective and timely support is put in place for the individual.

## **20. Monitoring attendance**

A child missing from an education setting is a potential indicator of abuse or neglect, including exploitation. Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, particularly on repeated occasions or if a child suddenly stops attending. The school will follow Bury's missing children protocol. For those children and families who have chronic poor attendance or persistent absenteeism, school will consider whether educational neglect is present and whether a referral to children's services is required, or whether the school should seek consent to begin an Early Help Assessment in order to coordinate a multi-agency plan of support for the child and family.

Attendance will be closely monitored. In line with the school's attendance policy, the attendance of children with known welfare and attendance concerns will be monitored closely, particularly those with chronic poor attendance or persistent absentees, or if a child suddenly stops attending. School will also scrutinise the attendance of any off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or SEN will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns.

It is important that the school's attendance team, including the EWO and school nurse are aware of any safeguarding concerns. It is critical that when a child is not attending school their welfare is confirmed and expected practice would be for an appropriate professional to visit the home and speak to the child alone, particularly if there are any safeguarding concerns. The timing for this home visit will be determined on a case by case basis. The school will seek to ensure it has at least three emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable and the child has not attended school. Where necessary, this may include reporting the child missing to the police. The school will ensure it is aware, in advance, of any difficulties in accessing the premises of a child's family home.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Children Missing Education (C.M.E.) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. All staff should be aware that children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Children going missing can also be an indicator of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. When a child is deemed to be missing from education, school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, our school will follow the local protocol for Children Missing Education and make a C.M.E referral to the Local Authority Officer for C.M.E.

Some parents will decide to remove their child from the school roll in order to educate them at home. For the majority of children, this choice will be with the child's best education at the heart of their decision and it will be a positive learning experience. However, this is not the case for all, and home education can mean that some children become less visible to services who are there to keep them safe and supported in line with their individual needs. Where a parent or carer has expressed their intention to remove their child from the school roll with a view to educating at home, the school will work together with other key professionals and will, where possible, attempt to facilitate a meeting with the family to ensure that all parties have considered what is in the best interests of the child. This is particularly important for those children who have SEND, are vulnerable, and/or who have a social worker. The school will also link with the named officer for Elective Home Education within the Local Authority.

## **21. Private fostering**

The Children Act 1989, 2004 and Children (Private Arrangements for Fostering) Regulations 2005 set out that Private Fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Our school has a mandatory duty to report to the local authority if they believe a child is subject to a private fostering arrangement. (This does not include close family relatives e.g. grandparent, brother, sister, uncle or auntie.) This means making a referral to children's services. A private fostering arrangement is made without the knowledge of the local authority for the care of a child under the age of 16 years (under 18 for children with disabilities) whereby the child is in the care of someone other than their parent or close relative. Further guidance is available in Keeping Children Safe in Education (DFE, 2021) and in [Children Act 1989 private fostering](#). When a child is privately fostered a social worker must carry out an assessment to ensure the placement is appropriate and consider any support needed.

## **22. Safer recruitment**

The school will ensure that all appointments follow its recruitment policy and the guidance set out in Keeping Children Safe in Education (DFE 2021). At least one member of the appointments panel will have undertaken safer recruitment. The school will undertake all the required DFE pre-employment checks and where appropriate will record these checks on the single central record and retain evidence in personnel files. The school will seek written confirmation that third-party organisations including contractor and alternative education providers have undertaken appropriate checks.

The school is required to inform relevant staff who fall within the scope of [Disqualification under the Childcare Act 2006](#) and establish they are not disqualified. The criteria for disqualification under the 2006 Act and the 2019 Regulations includes inclusion on the Disclosure and Barring Service (DBS) Children's Barred List or committing a relevant offence.

## **23. The Safeguarding Curriculum**

Children will be supported to develop their understanding, at the appropriate age, of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. Children will also learn about the wider safeguarding curriculum.

Pupil voice is encouraged throughout the school and is then evaluated and an action plan devised if necessary in response to this.

Our school website also signposts all our children (including their families) to numbers such as ChildLine and Barnardos as does the school Twitter account.

The school helps children keep themselves safe from harm through the school's PSHE /RSE curriculum (CORAM), alongside standalone pieces of work and messages delivered through other curriculum areas, as part of a broad and balanced curriculum. Children will be provided with age appropriate skills, knowledge and understanding to help them recognise and respond to issues such as consent and healthy relationships. Children will be supported to develop their understanding, at the appropriate age, of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. The

curriculum will include specific sequenced lessons to address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way. Our school recognises that a one size fits all approach may not be appropriate for all children, and a more personalised approach for more vulnerable children, victims of abuse and some SEND children may be necessary. Children will also learn about the wider safeguarding curriculum which for children would include road safety, anti-bullying and know how to seek support when needed. The school will ensure the curriculum promotes an understanding of the values needed to live within a democratic society including the rule of law, and individual liberty. It will promote tolerance and respect for all faiths (and those of no faith), races, genders, ages, disability and sexual orientations.

#### **24. Safeguarding children who attend off-site alternative provision**

When identifying that a child would benefit from attending off site provision, our school will undertake an assessment to determine that this placement is in the best interests of the child. We will ensure that the provision identified is suitable to meet the needs of that child. The school will retain responsibility for the safeguarding of any pupils we place in off-site provision. The school will undertake appropriate quality assurance checks to ensure that it is a safe place for the child to attend. The school will obtain written confirmation from the provider that the appropriate safeguarding checks have been carried out in respect of individuals working at the establishment. The school will have a formal agreement with the alternative provision and parent/carer regarding when the pupil should attend and what procedures that will be followed should the child not attend the placement. The school will ensure it seeks the views of the young people at off-site provision to ensure they feel happy and safe. When commissioning places at alternative provision, the school will pay due regard to [Alternative provision – DfE Statutory Guidance](#) and [Education for children with health needs who cannot attend school – DfE Statutory Guidance](#).

#### **25. Complaints and Whistleblowing**

Complaints about safeguarding should follow the school's complaints policy.

The school recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The school's Whistleblowing Policy is there to support and aid them in these circumstances. The Local Authority also has whistle blowing procedures.

Whistleblowing regarding the Head teacher should be made to the Chair of the Governing Body, whose contact details should be readily available to staff.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285.

## 26. Escalation

If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they escalate their concern within the organisation. All members of staff are aware of their responsibility to escalate and refer concerns on to Children's Services when it is appropriate to do so.

Where professional disagreement occurs and the Designated Safeguarding Lead and/or Deputy are unhappy with the actions or decisions of another agency, they will escalate their concern in line with the Local Authority's formal escalation policy to ensure a timely resolution.

The first step of any escalation process with another agency is to raise any concerns directly with the other professional and their line manager. A professionals meeting is always a positive way of resolving differences and remaining focused on the outcomes for the child.

## 27. Proactive Safeguarding (contextual safeguarding)

Our school recognises that school plays a significant part in the prevention of harm to our children by providing them with opportunities to learn, good lines of communication with trusted adults, supportive peers and an ethos of protection. As a result, safeguarding and child protection is at the heart of everything and underpins all policy and procedures within our school.

Our school recognises that we may provide the only stability in the lives of children who have been abused or who are at risk of harm.

Our school recognises that safeguarding incidents and/or behaviours can be associated with factors outside the school or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead and deputy should consider the context within which such incidents or behaviours occur. This is known as contextual safeguarding, or extra-familial harm, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Our school community will:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
- Promote a caring, safe and positive environment within the school.
- Ensure that the school site is a safe, secure and welcoming place to learn and grow.
- Encourage self-esteem and self-assertiveness through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying.
- Include regular consultation with children e.g. through questionnaires, participation in anti-bullying week, etc.

- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding messages across the full curriculum, including RSHE/PSHE, to ensure that the children are equipped with the skills they need to recognise risky behaviours, stay safe from harm and to know to whom they should turn for help. In particular this will include staying safe online, anti-bullying, e-safety, road safety, pedestrian and cycle training, focused work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel, issues around consent, sexting, positive mental health, etc.
- Offer a positive school experience.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks
- Ensure that all staff, volunteers, governors, policies and procedures operate with the best interests of the child at their heart.

## **28. Monitoring and Quality Assurance**

Policies and procedures only remain effective if they are regularly monitored and reviewed to ensure that they are still applicable and relevant. Our school and its governors recognise the importance of monitoring and quality assuring the effectiveness of our child protection policy and the procedures set out within it. The aim of monitoring and evaluating the child protection policy is to learn from practical experience, which will contribute to inform policy reviews and future changes to the policy and procedures. The process of monitoring and quality assurance will help the school and governors to identify the policy strengths and weaknesses, and will help to provide an understanding of the reasons for these, so that decisions can be made to resolve any limitations with immediate effect.

Monitoring and evaluation will be done by checking whether the standards from the child protection policy are implemented and whether safeguards are working and will be undertaken throughout the year by the Designated Safeguarding Lead, the Head teacher and the Chair of Governors. Activities which could form part of the ongoing monitoring of effectiveness could be:

- Scrutiny of the Single Central Record and personnel files to ensure pre-employment checks are robust and up-to-date, and that job descriptions for new positions include reference to child protection, etc.
- Scrutiny of the school's annual 175 safeguarding audit by the Chair of Governors and Link Governor for Safeguarding, alongside the full governing body having oversight of any actions arising from the audit.
- Confirmation that training has been undertaken according to planned schedule and that all relevant staff and volunteers have participated
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, pupils taken off roll, the views and progress and participation of vulnerable students. In particular, the school will monitor the link between attendance and safeguarding and those persistently absent, frequently late, missing school (including part of the school day) or those who suddenly stop attending.

- Methods such as 'safeguarding training questionnaires' used to evidence the effectiveness of staff training
- Regular meetings with staff, volunteers and children which include the opportunity to discuss safeguarding and child protection, or use of questionnaires to evidence this
- Safeguarding learning walks designed to evidence and test out key safeguarding standards
- Adapting and amending the policy and procedures outside of their annual review date to reflect current issues which may have recently arisen in order to ensure that all children are protected at all times.

## Appendix A: Early Help links/documents:

### Attachments

-  [Story So Far \[194kb\]](#)
-  [Story So Far - with prompts \[267kb\]](#)
-  [Story So Far - Guidance \[127kb\]](#)
-  [Team Around the Family Review Plan \[139kb\]](#)

### Guidance / Supporting documents

-  [Seven minute Early Help briefing \[391kb\]](#)
-  [How I see my world \[967kb\]](#)
-  [How I see my world - aide memoir \[56kb\]](#)
-  [The Review guidance \[37kb\]](#)

## Appendix B : Whistleblowing Flowchart:

This flowchart should be used for concerns about:-

- any unlawful act, whether criminal or a breach of civil law
- maladministration
- breach of any statutory code of practice
- breach of, or failure to implement or comply with Financial Regulations
- any failure to comply with appropriate professional standards
- fraud, corruption or dishonesty
- actions which are likely to cause physical/mental/psychological danger to any person, or to give rise to a risk of significant damage to property
- loss of income to the school
- abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose
- discrimination in the provision of education
- any other matter that staff consider they cannot raise by any other procedure

### **What do when a concern is raised against a member of staff.**

#### **Making a Disclosure**

Raise concerns with the **Headteacher/Principal** either in writing or verbally. If the concern is regarding the headteacher or principal, report to the Chair of Governors, the Chief Executive Officer CEO or the LADO – Local Authority Designated Officer.

The concern must include: the names of individuals, dates and places where applicable and the reasons for concerns.

**The earlier the concerns are disclosed, the easier it is for action to be taken**



#### **Responding to a disclosure**

An investigation may need to be carried out under strict confidentiality. At this point, the subject of the complaint will not be informed, until it becomes necessary to do so.

Depending on the nature of the concern, matters raised may:

- be investigated internally
- be referred to the Police
- be referred to the Audit Commission
- form the subject of an independent inquiry.



The Designated Officer will offer to keep the whistle-blower informed about the investigation and its outcome.

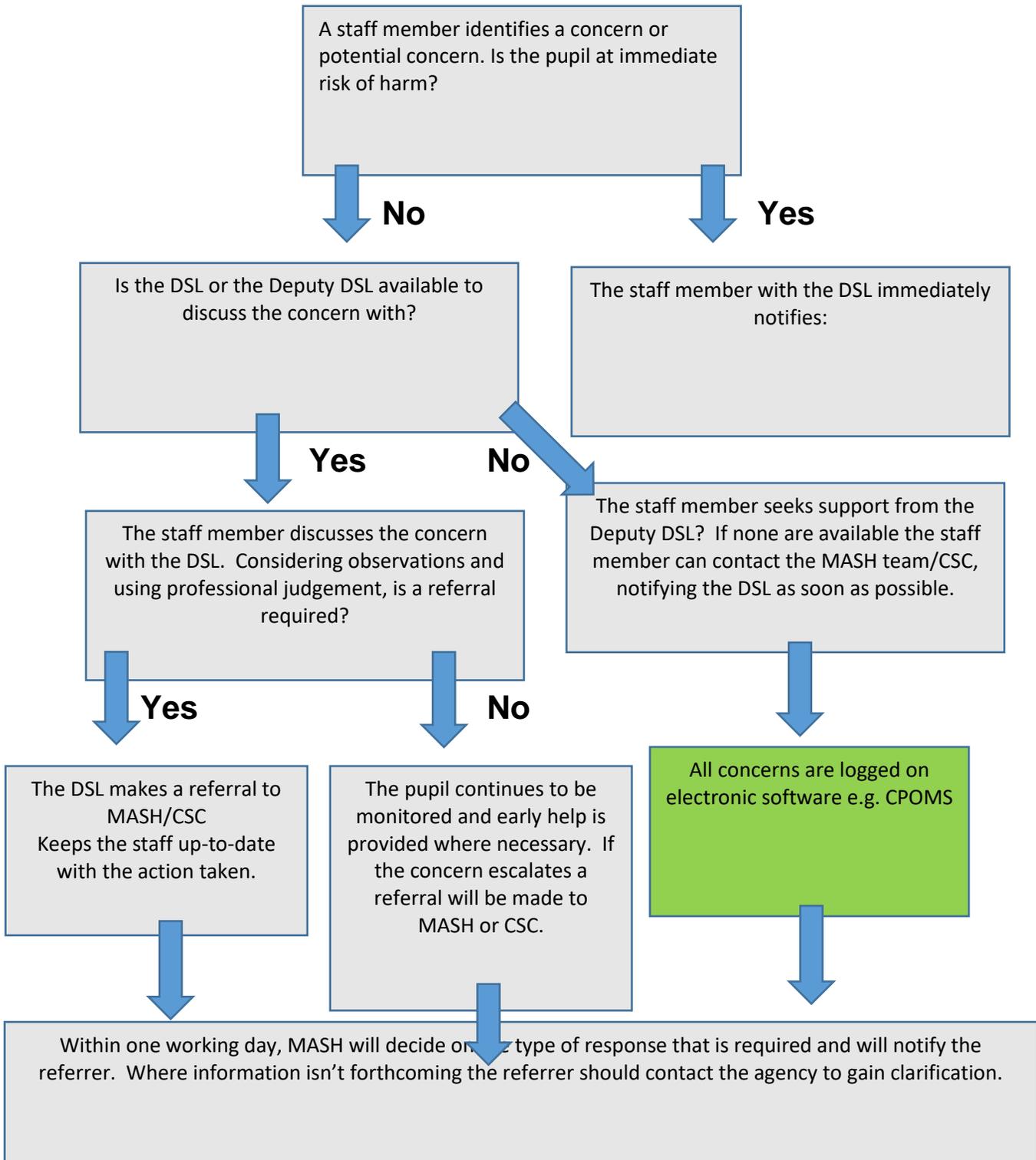
The feedback will be provided within one month of the completion of the investigation.

**Appendix C**

**Managing Referrals and Disclosures:**

Safeguarding Reporting Process The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed. The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

**Making a referral:**



Appendix D

**LADO**  
**BURY INITIAL CONSIDERATION/ENQUIRY FORM**

Once completed send to:- [LADO@bury.gov.uk](mailto:LADO@bury.gov.uk)

<b>Office Use Only</b> Is this at LADO/Managing Allegations Full Threshold: If Yes - Reference no. (From Database):
---

Date LADO notified:	
Name of person completing the form:	
Full Name of person of potential concern:	
Date of birth	
Address of Person	
Details of Establishment where person of potential concern works	
If agency worker, details of agency, telephone number and contact name	
Job role	
Contact number of referrer:	
Email Address of referrer:	
Name/Position of person referring information:	
Category Choose an item.	Area of complaint Choose an item.

**PLEASE KEEP INFORMATION CLEAR & CONCISE**

<b>DETAIL OF: ALLEGATION/INCIDENT/ENQUIRY</b> (date and time of allegation)

<b>CHILD'S Details, to include full name, date of birth and address/INITIAL ACCOUNT OBTAINED</b> (Preferably with parent or carer present unless they are the person of potential concern) (Note: no leading questions should be asked, questions should be kept open and to a minimum, i.e., what was the incident, and how did they feel, did anyone witness this?)
<b>PARENTS/CARERS details of child if known and contact numbers - CARERS VIEW</b> (what was their response and what action would parents/carers like to see taken)
<b>ANY WITNESSES? – Full details of contact details</b> (Note: if so do not discuss what the child has said, ask only if they are aware on any incident that has occurred involving the child and ask that they make a note of their account, print name, sign and date)
<b>IS THERE ANY CCTV FOOTAGE TO PROVE OR DISPROVE THE ALLEGATION? If there is, what does it show?</b> (Please check this first and ensure a copy is kept)
<b>HAVE THERE BEEN ANY HISTORIC ALLEGATIONS MADE BY THE CHILD?</b> (dates and outcomes)
<b>HAVE THERE BEEN ANY HISTORIC ALLEGATIONS OR CONCERNS IN RELATIONS TO THE MEMBER OF STAFF?</b> (dates, what the allegation was and outcome)

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**Office Use Only:**

<b>POLICE ADVICE OR RESPONSE</b>
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<b>HR/Employer ADVICE OR RESPONSE</b>
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<b>CHILDREN'S SOCIAL CARE ADVICE OR RESPONSE</b>
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<b>LADO ADVICE OR RESPONSE – Final Outcome</b>
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**Office use only:**

Date of Closure: \_\_\_\_\_

Signed by: \_\_\_\_\_

Position: \_\_\_\_\_

<b>Emails received to show confirmation of above if needed.</b>

**Appendix E:  
Useful links and websites:**

<b>DOMESTIC ABUSE:</b> <a href="#">Domestic Abuse Bill/Factsheet</a>
<b>National Domestic Abuse Helpline:</b> Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.
<b>Useful websites:</b>
<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/</a>
<a href="http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/">http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/</a>
<a href="#">Domestic Abuse Act 2021</a>
<a href="#">Save Lives &amp; Domestic Abuse</a>
<b>Child Criminal Exploitation CCE:</b> <a href="#">Children Who May Have Been Trafficked - Government Guidance</a>
<b>County Lines:</b> Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office below:
<a href="#">What to do if you are worried a child has been abused</a> DfE advice
<a href="#">Domestic Violence and Abuse</a> Home Office
<a href="https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief">https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief</a> DfE advice
<a href="https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/">https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/</a> Home Office
<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf</a>
<b>Government guidance:</b>
<a href="#">Sexual Violence and Sexual Harassment between children - Schools/Colleges</a> DfE advice
<a href="#">Serious Violence Strategy</a> Home Office Strategy
<b>Female Genital Mutilation:</b>
<a href="#">Multi-agency Guidance for FGM</a>
<b>Forced Marriage:</b>
<a href="#">Government Guidance - Forced Marriage</a>
<a href="#">multi-agency practice guidelines: handling cases of forced marriage</a>
<a href="#">multi-agency statutory guidance for dealing with forced marriage</a>
<a href="#">multi-agency practice guidelines for Forced Marriage and learning disabilities</a>
<b>Sexual Violence and Harassment:</b>
<a href="#">Sexual violence and harassment between children in schools and colleges</a>
<a href="#">Gangs and Youth Violence - Schools/Colleges</a> - Home Office Advice
<a href="#">Strategy to End Violence against women and girls</a> - Home Office Strategy

<a href="#">Statement of expectations - violence against women and girls</a> Home Office Guidance
<a href="https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges">https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges</a> DfE advice
<a href="https://www.gov.uk/government/publications/serious-violence-strategy">https://www.gov.uk/government/publications/serious-violence-strategy</a> Home Office Strategy
<b>Harmful Sexual Behaviour:</b>
<a href="#">Lucy Faithfull Foundation</a> Lucy Faithfull Foundation has developed a HSB Toolkit.
<a href="#">Beyond Referrals</a> Contextual Safeguarding Network – Beyond Referrals (schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
<b>Modern Slavery:</b>
<a href="#">Modern Slavery</a> - guidance
You can also access <a href="#">documents related to the Modern Slavery Act</a> .
<b>Prevent Duty:</b>
<a href="#">Prevent Duty Guidance</a>
<a href="#">British Values Toolkit</a>
<b>Children and the Court System:</b>
<a href="#">Get Help With Child Arrangements</a>
<a href="#">Young Witness Booklet - 5 - 11 year olds</a>
<a href="#">Young Witness Booklet 12-17 year olds</a>
<b>Online Safety:</b>
<a href="#">Teaching Online Safety in Schools</a>
<a href="#">DfE advice - Online Safety in Schools</a>
<a href="#">Education for a connected world</a>
<a href="#">Think U Know How</a> National Crime Agency
<a href="#">Public Health England Resources</a>
<b>Children Missing from Education:</b> <a href="#">Children Who Go Missing From Education (CME)</a> -
<b>Reasonable Force:</b> <a href="#">Reducing the Need for Restraint and Restrictive Intervention</a>
<b>Mental Health/Bullying:</b>
<a href="#">Preventing and Tackling Bullying</a>
<a href="#">Mental health and behaviour in schools guidance</a>
<b>Expert Organisations:</b>
<a href="#">Barnardo's</a>

<a href="#">Lucy Faithful Foundation</a>
<a href="#">NSPCC</a>
<a href="#">Rape Crisis</a>
<b>University of Bedfordshire on Contextual Safeguarding:</b>
<a href="#">Contextual Safeguarding</a>
<a href="#">UK Safer Internet Centre</a>
<b>Support for victims:</b>
<a href="#">Anti-Bullying Alliance</a>
<a href="#">MoJ Victim Support</a>
<a href="#">Rape Crisis</a>
<a href="#">The Survivor's Trust</a>
<a href="#">Victim Support</a>
<b>Toolkits:</b>
<a href="#">Brook</a>
<a href="#">NSPCC</a>
<b>Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire:</b>
<a href="https://www.farrer.co.uk/News/Briefings/PEER-ON-PEER-ABUSE-TOOLKIT/">https://www.farrer.co.uk/News/Briefings/PEER-ON-PEER-ABUSE-TOOLKIT/</a>
<b>Further Information on confidentiality and information sharing:</b>
<a href="#">Gillick Competency Fraser Guidelines</a>
<a href="#">Government Information Sharing Advice</a>
<a href="#">Information Commissioner's Officer: Education</a>
<b>Information on sending nudes (previously known as sexting):</b>
<a href="#">UK Council for Child Internet Safety: Sexting Advice</a>
<a href="#">London Grid for Learning - Collection of Advice</a>
<b>Support for parents:</b>

<a href="#">Childnet</a> offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
<a href="#">Commonsensemedia</a> provide independent reviews, age ratings, & other information about all types of media for children and their parents.
<a href="#">Government Advice</a> about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying.
<a href="#">Government Advice</a> about security and privacy settings, blocking unsuitable content, and parental controls.
<a href="#">Internet Matters</a> provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
<a href="#">ParentZone</a>
<a href="#">Parentsafe - London Grid for Learning</a>
<a href="#">CEOP Thinkuknow - Challenging Harmful Sexual Attitudes and their Impact</a>
<a href="#">CEOP Thinkuknow - Supporting Positive Sexual Behaviour</a>
<b><u>Harmful Sexual Behaviour:</u></b>
<a href="#">Parents Protect Traffic Light Tool</a>
<a href="#">Concerned about a child/yp - harmful sexual behaviour</a>

**Appendix F:  
Acronym List/Description:**

ACES	Adverse childhood Experiences	Traumatic events which can have an impact on both children and/or adult's lives.
CCE	Child Criminal Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CLA (previously LAC)	Child Looked After	Children looked after: A child who has been placed in local authority care or where children's services have looked after a child for more than a period of 24 hours.
CME	Child Missing from Education	Children Missing Education (CME) are children who are of compulsory school age who are not on a school roll and who are not receiving a suitable education by other means (e.g. privately, electively home educated (EHE) or in alternative provision).
CSC	Children's Social Care	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure

		compliance with the Data Protection Act.
DSL	Designated Safeguarding Lead	A member/s of the senior leadership team who has lead responsibility for safeguarding and child protection
EHC Plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.
GDPR	General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA/HBV	Honour Based Abuse/ Violence	'Honour-based' abuse So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales.
HMCTS	HM Courts and Tribunals Service	HMCTS is an executive agency, sponsored by the Ministry of Justice.
HSB	Harmful Sexual Behaviour (also known as Sexually Harmful Behaviour)	Harmful Sexual behaviour is sexual behaviour expressed by children or young people under the age of 18 years old that is developmentally inappropriate, this may be harmful towards oneself or others or be abusive towards another child, young person or adult.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the 6 Disclosure and Barring Service to learn more

		about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
ITT	Initial teacher training	A programme of training to achieve qualified teacher status.
KCSiE	Keeping Children Safe in Education	Keeping children safe in education Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LADO	Local Authority Designated Officer	All allegations about people who work with children, in statutory, independent or voluntary organisations, must be referred to the Local Authority Designated Officer (LADO). A referral to the LADO <b>must</b> be made if there is information about a person indicating they have: <ul style="list-style-type: none"> <li>▪ Behaved in a way that has harmed a child or may have harmed a child;</li> <li>▪ Possibly committed an offence against or related to a child;</li> <li>▪ Behaved towards a child or children in a way that indicates they may pose a risk of harm to children;</li> <li>▪ Behaved or may have behaved in a way that indicates they may not be suitable to work with children.</li> </ul>
LGBTQ+	Lesbian, gay, bisexual, transgender, queer, plus	Term relating to a community of people, protected by the Equalities Act 2010, who identify as a lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PSHE	Personal Social and	A non-statutory subject in which pupils learn

	Health Education	about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
RSE	Relationships and sex education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality as well as promoting positive relationships.
SCR	Single Central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend educational provision in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of HWHS's special educational needs policy and provision of education to pupils with special educational needs.
SEND	Special educational needs and/or disabilities	A pupil is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most pupils their age.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school/college setting.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual School Heads	Virtual school head Virtual school heads are in charge of promoting the educational achievement of all the children looked after (CLA) previously LAC by the local authority.