



## Broadfield Primary School Safeguarding Policy

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### **KEY CONTACTS WITHIN THE SCHOOL**

**SENIOR DESIGNATED PERSON FOR SAFEGUARDING:**

Name: Patricia Stennett

Contact Number: 0161 665 3030/07776661836

**DEPUTY DESIGNATED PERSON FOR SAFEGUARDING:**

Name: Carol Walker

Contact Number: 0161 665 3030

**THIRD DESIGNATED PERSON FOR SAFEGUARDING:**

Name: Penny Rotton

Contact Number: 0161 665 3030

**NOMINATED GOVERNOR FOR SAFEGUARDING:**

Name: Martin Griffin

## SAFEGUARDING OLDHAM

### Useful Contacts

SAFEGUARDING ADVISOR FOR EDUCATION	David Devane	<a href="mailto:david.devane@oldhamgov.uk">david.devane@oldhamgov.uk</a> Tel: 0161 770 8868 Mob: 07753 715566
MASH	Child.mash@oldham.gov.uk	0161 770 7777
LADO	Colette Morris Business Support Catherine Leach	Referrals to LADO or <a href="mailto:catherine.leach@oldham.gov.uk">catherine.leach@oldham.gov.uk</a>
LA PREVENT LEAD	Natalie Downs Lead Contact: Bruce Penhale	<a href="mailto:natalie.downs@oldham.gov.uk">natalie.downs@oldham.gov.uk</a> Channel <a href="mailto:bruce.penhale@oldham.gov.uk">bruce.penhale@oldham.gov.uk</a> Tel: 0161 770 4196
OPERATION ENCOMPASS	Queries to the police	<a href="mailto:oldham.publicprotection@gmp.police.uk">oldham.publicprotection@gmp.police.uk</a>
OPERATION ENCOMPASS LEAD	DI Abigail Cronin	<a href="mailto:abigailX.cronin@gmp.polic.uk">abigailX.cronin@gmp.polic.uk</a>
EARLY HELP Service Manager	Debbie Margiotta	<a href="mailto:deborah.margiotta@oldham.gov.uk">deborah.margiotta@oldham.gov.uk</a>
SAFEGUARDING UNIT	Case Conference Enquiries	<a href="mailto:childrens.safeguarding@oldham.gov.uk">childrens.safeguarding@oldham.gov.uk</a>
LEGAL SERVICES		<a href="mailto:FamilyLegal@oldham.gov.uk">FamilyLegal@oldham.gov.uk</a>
LA COMPLAINT OFFICER	Senior Children's Services Officer Sarah Adderley	<a href="mailto:sarah.adderley@oldham.gov.uk">sarah.adderley@oldham.gov.uk</a> Tel: 0161 770 1129
INFORMATION GOVERNANCE MANAGER	Justin Hardy	<a href="mailto:justin.hardy@oldham.gov.uk">justin.hardy@oldham.gov.uk</a>

## Safeguarding Policy

### 1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

### 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2022) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with

regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

### 3. Definitions

Safeguarding and Child Protection is everyone's responsibility.

Child Protection and Safeguarding are not the same thing.

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

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

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

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Oldham Local Authority
- A clinical commissioning group for an area within Oldham LA
- The chief officer of police for a police area within the Oldham LA

#### **4 Equality statement**

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

#### **5. Roles and responsibilities**

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff and governors in school.

##### **5.1 All staff**

All staff will:

- Read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they’ll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, the online safety policy] and the safeguarding response to children who go missing from education
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

## **5.2 The designated safeguarding lead (DSL)**

The DSL is Patricia Stennett, Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss child protection.

Out-of-school hours, the DSL can be contacted via email (including Operation Encompass alerts) and phone number on page 1.

### **The Deputy Designated Safeguarding Lead is: Carol Walker, Deputy Head**

In the absence of the Designated Safeguarding Lead and the Deputy Safeguarding Lead, staff should speak to **Penny Rotton (EYFS Leader)** who is the third Designated Safeguarding Lead who may take advice from local children’s social care.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour

### 5.3 The Governing Body

Governors will review this policy annually and may amend and adopt it at any time in accordance with any new legislation or guidance or in response to any

Governors will review this policy annually and may amend and adopt it at any time in accordance with any new legislation or guidance or in response to any safeguarding arrangements made.

The Nominated Governor for Safeguarding at **Broadfield** is Martin Griffin.

The role of the role of the Nominated Governor is:

- The lead person who understands the safeguarding requirement;
- Supports the work of the designated safeguarding lead;
- Meets regularly with the designated safeguarding lead and any other relevant staff;
- Reports back to the governing body about his activities to inform them in order to facilitate scrutiny and impact of safeguarding; and ensure compliance with statutory duties;

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

All governors will read Keeping Children Safe in Education 2022

### 5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns

### 5.5 Working with parents and carers

Broadfield recognises the importance of working in partnership with parents carers to ensure the safety and welfare of pupils.

The school will:

- Make parents aware of the school's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils where necessary, by making all school policies available on the school website or on request
- Provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff
- Consult with and involve parents and carers in the development of school policies to ensure their views are taken into account
- Provide advice and signpost parents and carers to other services and resources where pupils need extra support

## **6. Multi-Agency Working**

Broadfield Primary School has developed effective links with other agencies and co-operates as required with any enquiries regarding child protection issues. The school will notify the allocated social worker if:

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

### **6.1 Early Help**

Early Help means providing support as soon as a problem emerges and prevent concerns from escalating. In the first instance, staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment.

In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- Children with disabilities and additional needs, including those with special educational needs
- Children with mental health needs
- Children who show early signs of abuse and neglect
- young carers
- Children showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Children who frequently go missing from home



- Children at risk of being radicalised or exploited
- Children whose home circumstances are negatively affected by adult substance or adult mental health issues and domestic abuse
- Privately fostered children
- Children who have returned home to their family from care
- Children who are persistently absent from school including part of the school day

If early help and other support is appropriate the case will be kept under constant review to ensure outcomes for the child is improving. If the school believes that this is not the case, consideration will be given to making a referral to children's social care.

### 7.1 Confidentiality

Broadfield has the following principles with regards to sharing information within the school, our 3 safeguarding partners and other educational providers:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.
  - The DSL should consider that:
    - parents or carers should normally be informed (unless this would put the victim at greater risk)

- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care,
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

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

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

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

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

#### Making a Child Protection Referral

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Parents should be informed about a referral which is to be made about their child unless any of these situations apply in which case the MASH will make the decision about when and how to inform parents:

Sexual abuse is suspected

Organised or Multiple Abuse is suspected

Fabricated or induced illness is suspected

Contacting the parents would place the child, referrer or others at risk

Risk of forced marriage

Child may be intimidated into changing, or preventing them from giving, information about the abuse

The following steps should be taken when making a referral to MASH:

Contact MASH – 0161 770 7777

Complete a written referral which can be submitted online. It is important to have names and date of birth of the child and any other family members. Child's full address and telephone number. Contact numbers for parents. Ethnic origin. Reason for the referral. Action taken and people contacted since concern arose

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

Action taken to ensure the immediate safety of the child

Make Child Protection Enquiries (under Section 47 of the Children Act 1989)

Decision is made if it is appropriate to call a Child Protection Conference

Offer services to the family to relieve need or reduce risk

Refer the family to another agency

Take no further action

The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

### **Child Protection Conferences and Core Group Meetings**

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

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

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

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

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

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

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

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process. All information should be logged on CPOMS.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

### **8.3 If you discover that FGM (Female Genital Mutilation) has taken place or a pupil is at risk of FGM**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

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

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2022), paragraph 44 says 'whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM

appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

### Making a report

It is recommended that you make a report orally by calling 101, the single non-emergency number.

When you call 101, the system will determine your location and connect you to the police force covering that area. You will hear a recorded message announcing the police force you are being connected to. You will then be given a choice of which force to be connected to – if you are calling with a report relating to an area outside the force area which you are calling from, you can ask to be directed to that force.

Calls to 101 are answered by trained police officers and staff in the control room of the local police force. The call handler will log the call and refer it to the relevant team within the force, who will call you back to ask for additional information and discuss the case in more detail

You should be prepared to provide the call handler with the following information:

- explain that you are making a report under the FGM mandatory reporting duty
- your details:
  - name
  - contact details (work telephone number and e-mail address) and times when you will be available to be called back
  - role
  - place of work
  - details of your organisation's designated safeguarding lead:
    - name
    - contact details (work telephone number and e-mail address)
    - place of work
  - the girl's details:
    - name
    - age/date of birth
    - address

You will be given a reference number for the call and should ensure that you document this in your records.

### Record keeping

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

### Informing the child's family

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means. Wherever possible, you should have this discussion in advance of/in parallel to the report being made.

However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

### Responsibilities after the report has been made

Depending on your role and the specific circumstances of the case, you may be required to contribute to the multi-agency response or other follow up to the case which will follow your report.

### **If you have concerns about a child**

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

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

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving.

Timelines of interventions will be monitored and reviewed.

All Early Help Referrals will be processed through a central referral to the Oldham Multi-Agency Support Hub (MASH).

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

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

If the child's situation does not seem to be improving after the referral, the DSL/deputy DSL must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

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

### **If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

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

All staff at Broadfield, are 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.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where there are safeguarding concerns arising from a pupil's mental health issues, staff will discuss concerns with the designated safeguarding lead to agree any actions to be taken. Issues or concerns can also be discussed with our Pastoral Worker, Colin Cameron or our Senior Mental Health Lead Elaine Carroll. The school will ensure that staff have an understanding of trauma informed practice and its link with mental health and are able to recognise pupils who are experiencing mental health issues and help them to access the most appropriate help. The school will ensure that staff are teaching about mental wellbeing (as part of the statutory Health Education) to help reduce the stigma attached to mental and emotional problems and ensure pupils know how to keep themselves mentally healthy and know how to seek support. The school will also ensure early identification of pupils who have mental health needs and put in place appropriate support and interventions, including specialist services, where needed such as Place 2Be and/or CAMHS. The school will take account of the government guidance Mental health and behaviour in schools.

- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- Broadfield will always refer to the Department of Education guidance on mental health and behavior in schools where more guidance is required.

## **8.7 Concerns about a staff member or volunteer**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

### **Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

### **See appendix 3 for more information about child-on-child abuse.**

Procedures for dealing with allegations of child-on child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL/DDSL will contact Healthy Young Minds if appropriate



At Broadfield we recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently speak to a trusted adult
- Ensure staff reassure victims that they are being taken seriously
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Having a visible presence of staff on duty at break times, lunchtimes and before/after school
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

### **8.8 When there has been a report of sexual harassment**

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. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

Recognising that a child is likely to disclose to someone they trust: this could be anyone in the school. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child; recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

The trusted adult should observe the following:

- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed,
- Not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

#### Considering confidentiality and anonymity

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

School should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise

official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care,
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.
- If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

There are four likely scenarios for school to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

The four scenarios are:

- Manage internally

In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident

internally, perhaps through utilising their behaviour policy and by providing pastoral support.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

- Early Help

In line with 1 above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

- Referrals to children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, school should make a referral to local children's social care. At the point of referral to children's social care, will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

- Reporting to the Police

Any report to the police will generally be in parallel with a referral to children's social care (as above). Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. At this stage, school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, school should be aware of anonymity,

As a matter of effective safeguarding practice, school should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. School should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

### **Sharing of nudes and semi-nudes (also known as sexting)**

#### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

#### **Review of incident**

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

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

- The incident involves an adult

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### **Further review of incident**

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

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

#### **Informing parents/carers**

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

#### **Referring to the police**

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

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **9. Online safety and the use of mobile technology**

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

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

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Broadfield use Smoothwall Monitor. Smoothwall Monitor assesses content generated on children's devices and uses it to build the following risk profiles:

- Cyberbully
- Cybersexer
- Offensive user
- Oversharer
- Potential paedophile

#### **10. Notifying parents and carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision

#### **11. Children with Special Educational Needs and Disabilities or certain health conditions**

Children and young people with special educational needs and disabilities or certain health conditions can face additional safeguarding challenges because:

- there may be 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;



- 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 managing or reporting these challenges

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

At Broadfield, we endeavour to identify and reduce the additional barriers faced by some by providing the following:

- a safe space for them to speak out to share their concerns with either a trusted adult, the Pastoral Worker and or Place2 Talk
- wellbeing discussion at termly meetings
- social stories

### **11.2 Children with a social worker**

At Broadfield, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

At Broadfield, most of the children that have a social worker are supported in the following ways:

- monitored/supported by Mr Cameron our Pastoral worker
- support from Place2Be

Particular vigilance will be exercised in respect of pupils who are subject to a Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the School's Designated Safeguarding Lead).

### **11.3 Children and Families New to the UK**

We recognise that Oldham has experienced a significant increase in children and young people for whom English is not the first language and therefore there is an increased risk of needs going unmet because of language barriers.

Where English is not the first language and/or a child is considered to be vulnerable, efforts will always be made by staff to actively engage with them by talking directly to them about their wishes and feelings, if necessary through the regular use of an interpreter.

#### **11.4 Looked-after and previously looked-after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect.

**Broadfield Primary School** will ensure staff have the skills, knowledge and understanding to keep looked after children safe. The school will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

At **Broadfield Primary School** we understand that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

If the pupil in question is a Child Looked After, this will also be brought to the notice of the Designated Safeguarding Lead and the Designated Teacher for Children Looked After, these children will be monitored.

#### **Designated Children Looked After Lead**

At **Broadfield Primary School** the Headteacher – Ms Stennett is the designated teacher who promotes the educational achievement of children who are looked after. The designated teacher works with the local authority to promote the educational achievement of pupils who are looked after, who have left care through adoption, special guardianship or child arrangement orders or who were adopted from outside England or Wales.

#### Virtual School Heads

The Virtual Headteacher has responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

The Designated Children Looked After Lead works in partnership with the Virtual School Head to ensure the safeguarding vulnerabilities for Children Looked After are appropriately met. In addition, the Virtual School Head receives pupil premium plus additional funding based on the latest published numbers of children looked after in the authority. The Children Looked After Designated Lead works with the Virtual Head to discuss how the funding can be best used to support the progress of looked after children in the school and meet the identified needs identified in the children's personal educational plan. Personal Educational Plan meetings are held on a termly basis.

### **12. Complaints and concerns about school safeguarding policies**

#### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Whilst schools and colleges are not the employer of supply teachers, at Broadfield we will ensure all allegations are dealt with properly.

### **Other complaints**

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

Complaints relating to the premises will be handled by the Headteacher with the support of the Headteacher.

### **13. Whistle-blowing**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

### **14. Record –keeping**

We will hold records in line with our records retention schedule, this is typically to the age of 25.

Any members of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as possible on CPOMs noting what was said or seen, putting the event in context, and saving the date, time and location. All records must be signed and will include the action taken. The Designated Safeguarding Lead should also be told as soon as possible.

Broadfield Primary School will keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies and any other significant event in a child's life. All records are kept confidentially and securely and separate from pupil records. Any non-confidential records will be readily accessible and available.

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

Broadfield shares information with other agencies when this is appropriate, in line with our local safeguarding procedures. Information shared via email is done via CPOMS for schools using this system.

### **15. Training**

All staff and volunteers who are in regular contact with children will receive basic Level 1 child protection/safeguarding training to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

The training will be updated annually and will:

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

All newly recruited staff (teaching and non-teaching) and governors will be made aware of this policy. When new staff join our school they will be informed of the safeguarding arrangements in place.

All staff will undertake induction training that includes the school's safeguarding/child protection policy (which includes the staff code of conduct) and the Government's statutory guidance 'Keeping Children Safe in Education 2022. They will be given copies of our school's safeguarding policy and Keeping Children Safe in Education 2022.

All staff are expected to read these key documents and will sign and date acknowledgement of this.

All staff will have training on Prevent to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff also receive regular safeguarding and child protection updates through business meetings and emails as required.

Contractors and visitors will also receive a safeguarding information document on arrival to Broadfield

The school will ensure that the Designated Persons undertake inter-agency working and training (level 3 LSCB approved multi-agency training course) at two yearly intervals to keep knowledge and skills up to date.

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in school are effective.' This training is regularly updated.

At least one person conducting an interview for a post at the school will have undertaken safer recruitment training. This ensures that as a minimum, the contents of the Department for Education's statutory guidance and Keeping Children Safe in Education 2022 is covered and is in line with local safeguarding procedures.

## 16. Curriculum coverage

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

The programme is fully inclusive and covers the following issues:

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

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

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

### Healthy Schools

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

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

## 17. Early Years settings within schools

### Legal and policy framework

As an early years provider delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/974907/EYFS\\_framework-March\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974907/EYFS_framework-March_2021.pdf)

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

### **Safeguarding and child protection**

All safeguarding and child protection policies listed in this policy will apply equally to children in the early years settings so far as they are relevant to that age group.

In addition, the school has the following child protection policies:

- A policy on the use of mobile phones and cameras within the early years setting:
  - Parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile.
  - Parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted on social media sites or otherwise shared.
  - Staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose.
  - Staff do not use personal mobile phones in the early years setting whilst children are present and use them only during breaks.
- A statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

### **Suitable people**

Broadfield will follow the Safer recruitment for schools and colleges to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure that they are suitable to work with children, have relevant qualifications and are not disqualified from working in childcare settings.

Broadfield will ensure that staff and volunteers receive proper training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

### **Staff training, skills and supervision**

The school will ensure that:

- All staff in the early years settings have the relevant qualifications and skills for their role and receive relevant induction, child protection and safeguarding training in line with this policy.
- A member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips.
- The teacher/room leader liaises with parents to provide individual support for each child.

### **Staff ratios**

The school will ensure that:

- Staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe.
- Children are kept within staff sight and hearing at all times.

For nursery:

- There will be at least one member of staff for every 13 children.
- One member of staff will be a qualified teacher
- At least one member of staff will hold a relevant level 2 qualification

For reception classes:

- Classes will be led by a qualified teacher supported by suitably qualified support staff.

### **Health and safety and suitability of premises**

The school will ensure that all indoor and outdoor spaces and facilities used for early years setting are safe and fit for purpose and comply with school policies and standards for site safety and health and safety.

Additionally, the school will ensure that all potential hazards within the school and ensuring school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day.

### **Checking the identity and suitability of visitors**

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out
- Visitors will be expected to wear green lanyards  
The lanyard will be yellow for governors  
The lanyard will be red for contractors

All other staff wear a blue lanyard at Broadfield to differentiate between visitors  
Unidentified visitors will be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.  
The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils will be reported to the Police and alert other schools through appropriate systems.

### **Use of school premises by other organisations**

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

### **Serious Case Reviews**

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

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

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, parents/carers will be contacted immediately. The school will contact 101 to report the child as missing from school obtaining a log/reference number.

### **Monitoring arrangements**

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

### **Links with other policies**

This policy links to the following policies and procedures:

- Behaviour and Anti-Bullying
- SEND
- Staff code of conduct
- Complaints
- Health and Safety
- Attendance and punctuality
- E-Safety Policy
- RHSE
- Equality Statement



## Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist)

- Multiple bruises in clusters, or of uniform
- Bruises that carry an imprint, such as hand or a belt
- Bite marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders and the buttocks
- An injury that isn't consistent with the account given
- Changing or different accounts of how an injury occurred
- Fear of changing for PE
- Fear of going home or parents being contacted
- Inexplicable fear of adults or over-compliance
- Withdrawn behaviour
- Running away from home
- Isolation from peers

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Changes in behaviour or presentation which can indicate emotional abuse include:**

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or become clingy
- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Extreme shyness or passivity
- Running away, stealing and lying
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress
- Reporting parental violence or discord (i.e. exposure to domestic violence)

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist)

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Reluctance to undress for PE or swimming
- Eating problems such as overeating or anorexia
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Bedwetting
- Substance or drug abuse
- Sexual activity through drawings, language or play

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

**The physical signs of neglect may include:**

- Constant or frequent hunger sometimes stealing food
- Constantly dirty or smelly
- Loss of weight or constantly underweight
- Inappropriate clothing for the conditions
- Frequent diarrhea
- Untreated illnesses, injuries or physical complaints

Changes in behaviour or presentation which can indicate neglect may include:

- Frequent tiredness
- Overeating
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

## Appendix 2: Safer Recruitment and DBS checks – policy and procedures

**Broadfield Primary School** is committed to safer recruitment and the suitability of all staff at the school. The following people have undertaken The Children’s Workforce Development Council (CWDC) Safer recruitment training in line with government requirements.

Name	Role
Patricia Stennett	Headteacher/ Designated Safeguarding Lead
Carol Walker	DeputyHead/Deputy Designated Safeguarding Lead
Gina Andrewes	Chair of Governors
Martin Griffin	Governor
Diane Brown	School Business Manager

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### Advertising

When advertising roles, we will make clear:

- Our school’s commitment to safeguarding and promoting the welfare of children.

### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

### Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references.
- Ensure any references are from the candidate’s current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate’s most recent relevant period of employment if they are not currently employed.

### Pre-appointment checks

We will record all information on the checks carried out in the school’s single central record (SCR). We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after,

appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months.

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

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

- There are concerns about an existing member of staff's suitability to work with children;

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations)

offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

### **Contractors**

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

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

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

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

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

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

### **Trainee/student teachers**

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Ensure that all volunteers have a full enhanced DBS check and two references. Volunteers will be subject to the same code of conduct as paid employees of the school.

### **Governors**

All governors will have will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

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

### **Staff code of conduct**

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the behaviour policy.

Staff must maintain the highest standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities.

Staff acknowledge that relationships and associations that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the Designated Safeguarding Lead.

Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE and LA guidance.

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

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example, the door to the room in which 1:1 coaching is taking place should be left open or the teacher should ensure that they and the child are clearly visible e.g. the use of the conservatory. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

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

Staff supervising off-site activities or school journeys will be provided with a school mobile telephone as a point of contact for parents and/or parents will be contacted by school.

Staff should only use the school's digital technology resources and systems for professional purposes. Staff will only use the approved school email or other school approved

communication systems with pupil or parent/carers and only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parent/carers.

Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home. Personal mobile phones should not be in the classroom and mobile phones with cameras should not be in areas where children are vulnerable to any invasion of their privacy.

All staff should sign to say that they have read and understood the The Safer Working Practice Guidance and Keeping Children Safe in Education September 2022.

### **Confidentiality**

Where staff have access to confidential information about pupils/students or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil/student. All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil/student is bullied by another pupil/student (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the pupil's/student's parent or carer, nor with colleagues in the school except with a senior member of staff with the appropriate role and authority to deal with the matter. However, staff have an obligation to share with their manager or the school's Designated Senior Person any information which gives rise to concern about the safety or welfare of a pupil/student. Staff must never promise a pupil/student that they will not act on information that they are told by the pupil/student.

### **Position of Trust**

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.



### **Appendix 3: Allegations of abuse against staff**

At Broadfield, we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff.

There is an LA procedure (LSCB) for investigating allegations of professional abuse. Issues of concerns should be reported to the Headteacher or the Deputy Designated member of staff who should contact the Local Authority Designated Officer (LADO) TEL: 0161 770 8870.

For the purpose of this procedure an allegation is used in respect of all cases in which it is alleged that a person who works with children has: -

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

In connection with his/her employment or voluntary, or where

- Concerns arise about the person's behaviour with regard to his/her own children
- Concerns arise about his/her behaviour in the private or community life of a partner, member of the family or other household member.

This procedure should be read in line with Oldham Local Safeguarding Children Board procedures which can be accessed on the internet at <http://www.oldham.gov.uk/childprotection>.

- **The Headteacher** is responsible for undertaking the investigation about the allegation and if appropriate reporting the allegation to the Local Authorities Designated Officer.
- The Headteacher is responsible for ensuring that procedures are in place and are in line with Working Together to Safeguard Children 2020.
- The Local Authority is responsible for the management and oversight of all allegations within their authority from all organisations that offer a service to children.
- Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay (or Designated Safeguarding Lead).

#### **Any concerns about the headteacher should go to the Chair of Governors who can be contacted via the School Business Manager**

- Allegations made regarding a volunteer should be reported to the Headteacher immediately, unless that person is subject to the allegation, in which case it should be reported to the Deputy Headteacher.
- If the allegation meets any of the criteria discussed previously it should be reported to the Local Authority Designated Officer.
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

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

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

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

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

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

### **Procedures for dealing with allegations**

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. A trusted colleague could be asked to support the individual.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to

share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

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

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

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

### **Timescales**

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

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

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

### **Specific actions**

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

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the

school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

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

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. Most people will benefit from some help and support to return to work after a very stressful experience.

Depending on an individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate.

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

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

If a report is:

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

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

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

### **Record keeping**

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

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

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

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

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

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

## References

When providing employer references, we will:

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

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non recent allegations

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

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

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

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

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

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

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low level concerns**

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

### **Sharing low level concerns**

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per the Whistle Blowing Policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify if there are wider cultural issues within the school that enabled the behaviour to occur
- Provide extra training

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

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

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

The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record - Keeping**

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**



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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

#### **Appendix 4: specific safeguarding issues**

##### **Children Missing Education**

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2022) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

##### **Domestic Abuse**

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

**The National Domestic Abuse** helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

### **Operation Encompass**

Broadfield Primary School is part of the Operation Encompass initiative. This is a process used to inform schools when the police have attended an incident of domestic violence or abuse, where domestic abuse incidents have occurred in the homes of their pupils since the previous school day. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

### **Privately fostered children**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by

someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### **Young carers**

If schools have concerns about a pupil they believe to be a young carer, they can contact the Young Carers' Project on 0161-621-9400 or do a referral to Positive Steps.

### **Child Sexual Exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

Acquisition of money, clothes, mobile phones, etc. without plausible explanation;

- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;

- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

### **Appearance and Behaviour**

- Evidence of drug, alcohol or substance misuse;
- Volatile behaviour/mood swings/use of abusive language;
- Truancy/disengagement with education or change in performance at school;
- Low self-image, low self-esteem, self-harming behaviour, e.g. cutting
- Physical aggression to others;
- Change in appearance

### **Child Criminal Exploitation**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for

something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

### **Extra-familial harms**

At **Broadfield** all staff will be taught to recognise the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

### **County Lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

### **Homelessness**

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

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

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

### **Honour Based Abuse**

Honour based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

**Women and girls are the most common victims of honour based abuse however it can also affect men and boys.** Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **FGM**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

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

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

### Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

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

### **Forced marriage**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours.

There have been occasions when women have presented with less common warning signs such as cut or shaved hair as a form of punishment for disobeying or perhaps 'dishonouring' her family. In certain communities, it is considered important that women undergo female genital mutilation (FGM) before being able to marry- usually this will be performed during childhood, but there have been reports of young girls or young women undergoing FGM just before a forced marriage

Never attempt to intervene directly as a school or through a third party.

### **Serious violent crime**

All staff should be aware of the indicators, which may signal children are at risk from, or are 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 or 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 child maltreatment and having been involved in offending, such as theft or robbery.

### **Sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. It is important that all staff have a zero tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Lesbian, gay, bisexual and transgender (LGBT) children are also at greater risk.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

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. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Child-on child abuse**



All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or online. All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff should understand that even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported.

As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence- such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **Preventing Radicalisation**

**Radicalisation** – refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead (s) have received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

**Broadfield Primary School** seeks to protect children and young people against the messages of all violent extremism, including, but not restricted to those linked to Islamist ideology, or Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

Staff should be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputies) making a Prevent referral.

There is no such thing as a ‘typical extremist’. Those who become involved in extremist actions come from a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school’s core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

It is vital that **Broadfield** staff are able to recognise those children who could be potentially vulnerable.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes

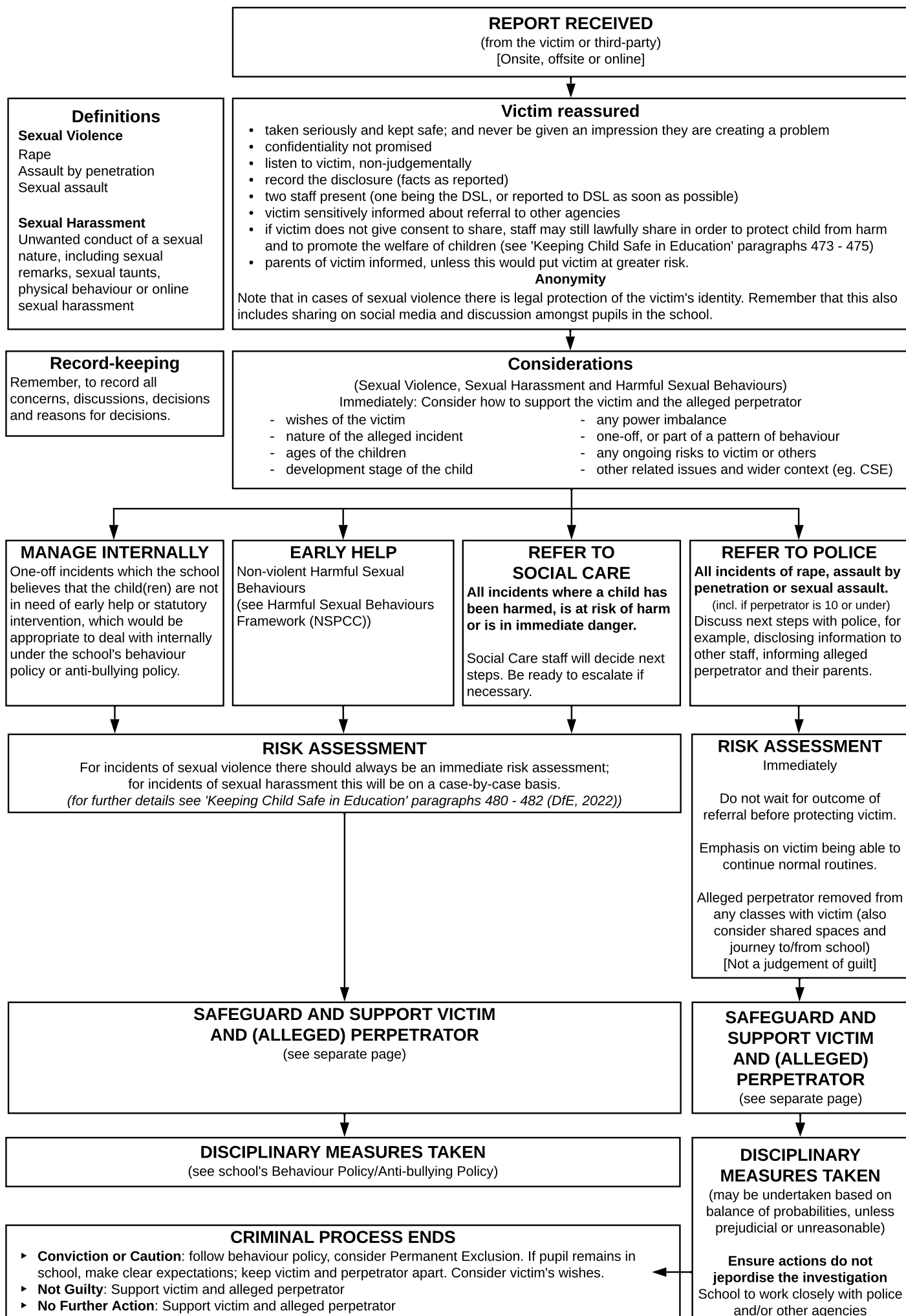
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

**Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector and social services) and the local community.

#### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, parents/carers will be contacted immediately. The school will contact 101 to report the child as missing from school obtaining a log/reference number.

# \*PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT



Source:

\*Keeping Children Safe in Education September 2022 (DfE, 2022)