HULME GRAMMAR SCHOOL

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SAFEGUARDING POLICY
This policy applies from EYFS through to year 13

Safeguarding
Safeguarding and promoting the welfare of children is defined as:
- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Principles
- The school is committed to the welfare, protection and safekeeping of all its pupils. If school staff have any concerns about a child's welfare, both physical and mental, they will act on them immediately.
- All children have a fundamental right to be protected from harm and from all forms of neglect, abuse and exploitation and should feel safe and secure at school. Exploitation is included to remind us that abuse might not just occur in the home but it may also occur outside of the home environment, even online.
- All those under 18 are children and are entitled to the rights and protections of a child.
- Parents should be reassured that it is the aim of the school to always act in the best interests of their child and to encourage the fullest possible involvement and consultation with parents.
- Pupils should know that they have a means of raising issues of personal concern. They should feel that their concerns are taken seriously, that they are encouraged to talk and that they are listened to.

Aims
- To raise the awareness of both teaching and non-teaching staff of the need for safeguarding and of their responsibilities in identifying and reporting possible cases of abuse.
- To ensure that all staff understand that safeguarding and promoting the physical and mental welfare of children is the responsibility of everyone who comes into contact with children and their families and carers.
- To ensure that the approach of all staff is child-centred and that they consider at all times what is in the best interests of the child.
- To emphasise the need for good levels of communication between all members of staff.
- To provide a structured internal procedure to be followed by all members of the school community in cases of suspected abuse.
- To support pupils' development in ways which will foster security, confidence and independence.
- To ensure that all staff are aware of referral procedures within the school.
- To provide help and support to meet the needs of children as soon as problems emerge.
- To monitor children who have been identified as 'at risk'.
- To ensure that outside agencies are involved where appropriate.
- To ensure that key concepts of Safeguarding, including online safety and consent, are integrated within the curriculum and that children are taught about Safeguarding, especially through PSHE.
- To create an environment where children feel secure, have their viewpoints valued, are encouraged to talk and are listened to. Where there is a safeguarding concern the school will ensure that the child's wishes are taken into account in determining what action to take. The child involved will be able to provide feedback to the DSL and / or the Deputy DSLs. Ultimately the school will act in what it believes to be in the best interests of the child.
- To promote an inclusive, anti-discriminatory culture where racism and other forms of discriminatory behaviour are recognised, challenged, and addressed as part of safeguarding responsibilities.

- To maintain an open environment where staff feel free to raise concerns (including whistleblowing), listen to children and are ready to involve agencies.

Statutory duty

- The school will take immediate action to safeguard the physical and mental welfare of any pupil who is suspected of being harmed or is in danger of being harmed.
- The school adopts the provisions of The Children Act, 2004. The school complies with the statutory guidance for school and colleges set out in DfE's 'Keeping Children Safe in Education' Keeping children safe in education - GOV.UK 2026 and 'Working Together to Safeguard Children' Working together to safeguard children 2026 - GOV.UK (Update March 2026) and Prevent Duty Guidance for England and Wales Prevent duty guidance: England and Wales (2023) - GOV.UK (Update March 2024) and will work and cooperate with all relevant local agencies. Following the withdrawal of Annex A in KCSIE 2026, **ALL school staff (both teaching and non-teaching) and regular volunteers are required to read Part 1 of KCSIE in full** as part of their induction and annual safeguarding update. **.** Details of the agreed procedures for the Oldham Safeguarding Children Partnership can be found at: Oldham Safeguarding Children Partnership
- All staff appointed to the school will be subject to an enhanced DBS with barred list check. In addition, a prohibition from teaching check, a check to establish a person's right to work in the UK, proof of identity and academic qualifications will be required. The school will verify a candidate's mental and physical fitness to carry out their work responsibilities.
- In accordance with KCSIE 2026, the supervision exemption has been removed. Any volunteer who teaches, trains, instructs, cares for, or supervises children for more than 3 days in a 30-day period (or overnight) is undertaking regulated activity and requires an Enhanced DBS check with Barred List Information, regardless of whether they are supervised. These checks will be completed prior to the volunteer commencing their duties.
- For appointments to relevant roles (including the board of Governors) the school will comply with the duty to check for prohibitions from the management of independent schools through the DBS and Teaching Regulation Agency (TRA) routes as appropriate.
- For full details of recruitment procedures including: selection procedure, pre-employment checks, policy on the recruitment of ex-offenders, assessment criteria and the retention and security of disclosure information please see the school's Recruitment policy. The school will comply with statutory guidance about disqualification from childcare. The school will inform relevant staff of the legislation (or ensure they have been informed by others such as their supply agency).
- EYFS staff and regular volunteers cannot begin work or volunteering until their DBS check, including barred list information, has been fully obtained.
- The school will take steps to gather sufficient and accurate information about whether any member of staff covered by the statutory guidance is disqualified and will keep a record of the date disqualification checks were completed, on the Single Central Register (SCR). The SCR is maintained by the school's HR Office and is monitored by the DSL. The school will gather this information by requiring relevant staff to complete a self-declaration form. For new staff the school will ask for this information as part of the pre-employments checks that it carries out.
- The school will notify Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children where childcare is being provided. The school will provide Ofsted with the following information about an employee when relevant:
    - Details of any order, determination, conviction, or other ground for disqualification under regulations made under section 75 of the Childcare Act 2006.
    - The date of the order, determination or conviction, or the date when the ground for disqualification arose.
    - The body or court which made the order, determination or conviction, and the sentence (if any) imposed;
    - A certified copy of the relevant order.

The school will notify Ofsted as soon as reasonably practicable, and at least within 14 days of the date school became aware of the information.

From 31st August 2018 'disqualification by association' has been disapplied to schools. However, the school will make staff aware that their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in school.

The school ensures that it creates a culture where staff feel comfortable to discuss matters outside of work which may have implications for the safeguarding of children in the workplace. Such discussions would: help safeguard staff welfare; establish if arrangements are needed to support staff; manage children's safety by establishing if there are measures that need to be put in place to safeguard children (e.g. by stopping or restricting a person visiting school where a potential risk to children has been identified.)

- Appropriate training in child protection and inter-agency working and procedures will be provided for the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads and updated every two years in line with Annex B in 'Keeping Children Safe in Education'.
- Training for all staff and volunteers will be provided and updated at least annually in accordance with Keeping Children Safe in Education.
- The school has entered into a Safeguarding Service Level Agreement with Oldham Safeguarding Children Partnership. This will enable the school to access more effective and integrated services at both strategic and individual case level. Staff will be able to receive high quality training relevant to the local and national agenda. In particular, for those who have responsibility for safeguarding or are involved with assessment and intervention, this will include: building effective working relationships with multi-disciplinary teams; learning from Serious Case Reviews (SCRs); reviews of child deaths; making referrals; child protection case conferences and sharing information between professionals to gain a common understanding of key terms, definitions and thresholds for action.
- All staff receive training in the Strategic Safeguarding Partnership's approach to prevent duties in line with Prevent Duty Guidance (Update December 2023). The DSL and DDSLs receive updated high level WRAP (Workshop to Raise Awareness of Prevent) training from the Strategic Safeguarding Partnership.
- The governing body will undertake an annual review of the safeguarding policy, procedures and the efficiency with all related duties having been discharged and a review of the SCR. If any deficiencies are found they will be rectified immediately. The date on which the annual review was carried out is on the last page of this policy.
- The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction.
- There is an annual CPD on Internet Safety.
- The DSL carries out an annual audit of filtering and monitoring on school devices and school networks.

Staff with key safeguarding responsibilities

The Designated Safeguarding Lead (DSL) is the Deputy Principal Pastoral – Mr A H Marshall – a.marshall@hulmegrammar.org
His role is outlined in Annex B of Keeping Children Safe in Education. He briefs the Principal - Mrs Kirsten Pankhurst - k.pankhurst@hulmegrammar.org

It should be noted that Andrew Marshall is the DSL for EYFS as well as being DSL for all other areas of the school.

Governor with responsibility for Safeguarding - Jack Williams

The Deputy Designated Safeguarding Leads (DDSL) are:

Mrs K Pankhurst Principal - k.pankhurst@hulmegrammar.org

Mrs Z Ward Head of Prep - z.ward@hulmegrammar.org

Mrs A Berry Head of Sixth Form a.berry@hulmegrammar.org

Dr C Millington Head of Science c.millington@hulmegrammar.org

Mr N Buckley Senior Pastoral lead - n.buckley@hulmegrammar.org

Miss S Cosgrove Class Teacher s.cosgrove@hulmegrammar.org

Miss K Evans Assistant Head (EYFS Lead)- k.evans@hulmegrammar.org

Mrs K Gresty School Medical and Wellbeing Officer - k.gresty@hulmegrammar.org

They may be contacted via the school's switchboards on 0161 624 4497 and will work in conjunction with the Principal on all safeguarding issues. The designated teachers for promoting the educational achievement of looked after children are the Senior Pastoral Lead, Mr Nathan Buckley and Head of Prep, Mrs Zoey Ward.

The school recognises that previously looked after children remain vulnerable and the designated teachers take the lead in working together with relevant staff and other agencies to safeguard these children. The DSL will have the details of the local authority Personal Advisor appointed to support and guide a care leaver.

The school recognises that the DSL (and the Deputies) are the most likely staff to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

During term time the DSL or a Deputy DSL's will always be available in school to discuss safeguarding concerns. During school holiday periods a member of SLT is designated as being on duty each week and staff will be issued with contact details of who they can raise concerns with should the need arise, for instance whilst on a school trip or holiday club activity.

Child Protection Procedures

The school will follow the procedures set out by the Oldham Safeguarding Children Partnership and take account of guidance issued by the DfE to:

- ensure we have a nominated governor responsible for safeguarding. Currently this is Jack Williams. The full Governing body is kept fully briefed on Safeguarding matters by the DSL in his termly reports and through briefings.
- ensure every member of staff, volunteer and governor has access to training which is regularly updated from externally accredited bodies and knows who the Designated Safeguarding Lead is and their role. In addition, all staff members will receive safeguarding updates as required but at least annually, to provide them with relevant skills and knowledge to safeguard pupils' mental and physical health effectively.
- ensure that appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. The DSL will have the lead responsibility in this area.
- ensure all staff, permanent and temporary, and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL or a DDSL. Safeguarding training will be a part of the induction programme for all new members of staff and will include: the school's Safeguarding Policy, (including the safeguarding response to children who go missing from education), the behaviour policy, the staff code of conduct, the school's

whistleblowing procedure, the identity of the DSL and the DDSL's and Keeping Children Safe in Education Part 1.

- staff may be required to monitor particular pupils with regard to safeguarding concerns, including the acceptable use of IT, Online safety, Staff and pupil relationships, including use of social media.
- ensure that all staff understand that if there is a risk of immediate serious harm to a child the referral should be made to the children's social care immediately. **Safeguarding is everyone's responsibility and all staff should understand that anybody can make a referral.** Staff should be aware that referrals to statutory agencies do not require parental consent. If anyone other than the DSL makes the referral they should inform the DSL, as soon as possible. If the child's situation does not appear to be improving the staff member with concerns has a responsibility to press for reconsideration with the relevant authority.
- reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- ensure that all staff are aware of the importance of children receiving the right help at the right time to assess risks and prevent issues escalating and not imposing high thresholds for referrals.
    - advice on the thresholds for referral to social care can be found at: Oldham Safeguarding Children Partnership and the threshold and continuum of need document.
    - These thresholds explain how Oldham Strategic Safeguarding Partnership identifies 4 stages in their continuum of need: Universal Care, Universal Plus "Earliest Possible Help", Targeted Family Help, Child Social Care.
- Ensure that staff are able to differentiate between safeguarding children who have suffered or are at risk of suffering serious harm, children in need and those who are in need of additional support from one or more agencies. They should be referred to the DSL or DDSL and reported to children's social care immediately and to the police if a crime is committed.
- Family Help and community-based early help pathways seek to take a holistic approach to helping families, rather than just individuals. Referrals to the Oldham Family Help team require the verbal consent of parents. Staff who feel a child living in Oldham would benefit from such a referral should discuss this with the DSL or DDSL. Oldham universal services and community based Family Help can be contacted via the Oldham "Duty and Advice" (MASH) number on: 0161 770 7777.
- If Family Help is appropriate the DSL or DDSL will take the lead and support relevant staff members in liaising with other agencies and setting up inter-agency assessment as appropriate. If Family Help is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving. Staff should be alert to the potential need for Family Help for pupils who have experienced multiple suspensions and are at risk of being permanently excluded from school. Staff should be aware that any child may benefit from Family Help, but they should be particularly alert to the potential need for Family Help for a child who: is disabled or has SEN; is a young carer; is showing signs of being drawn into anti-social or criminal behaviour including gangs; is frequently missing from care or home; misusing drugs or alcohol; is at risk of modern slavery or trafficking; is experiencing challenging family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; has returned home to their family after care; is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage; is showing early signs of abuse of neglect; is at risk of being radicalised; or is privately fostered or is persistently absent from education, including persistent absences for part of the school day.
- All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice based harm and ensure that concerns are considered within the school's safeguarding procedures.
- ensure that school staff understand that safeguarding incidents and/or behaviours can be associated with factors outside of school and can occur between children outside of school. All

staff should be considering the context within which such incidents occur. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families, including online and children should be protected from maltreatment. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. (This is known as contextual safeguarding which considers whether wider environmental factors are present in the child's life which are a threat to their welfare / safety. Contextual Safeguarding recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.)

- Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and attendance and progress.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL or a DDSL.

It is therefore important that school staff provide as much evidence as possible during the referral process.

- ensure that pastoral staff check with the DSL or DDSL if there are safeguarding concerns about a pupil which should be passed on when facilitating a transfer to another school. The DSL has responsibility for ensuring that the child protection file is transferred to the new school / college as soon as possible separately from the main pupil file, within 5 days of the pupil starting at the new establishment. Secure transit will be ensured and confirmation of receipt obtained, where appropriate transfers will be completed through the CPOMS system. The DSL will also consider whether it would be appropriate to share any information with a new school or college in advance of a child leaving. Such material received for new pupils at Hulme Grammar School will be noted by the DSL.
- ensure that staff are familiar with the Staff Code of Conduct and the guidance contained therein about their behaviour and actions so as not to place pupils and staff at risk of harm or allegations of harm to a pupil.
- ensure that in cases of serious harm the police should be informed from the outset.
- ensure that parents have an understanding of the responsibility placed on the school and staff for safeguarding by setting out its obligations in the school prospectus.

- notify Social Care if there is an unexplained absence of more than two days of a pupil who is on the child protection register.
- develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters. This involves ensuring that arrangements are in place that set out the process and principles for sharing information, including the seven golden rules for sharing information in: Information sharing advice for safeguarding practitioners - GOV.UK
- ensure that staff can be released to attend child protection case conferences.
- keep written records of concerns about children, even where there is no need to refer the matter immediately and ensure all records are kept securely, separate from the main pupil file. CPOMS is used solely for this purpose.
- ensure that record keeping procedures on staff and volunteers are in place.
- ensure **safe recruitment and selection practices** are followed. DBS, prohibition from teaching and identity checks should be carried out. References should be verified. Appropriate checks will be carried out on staff working with pupils off-site or with another employer. At least one of the persons responsible for a recruitment process for a prospective employee will be safer recruitment trained.
- The school will only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.
- In addition, as part of the shortlisting process, the school will carry out an online search as part of due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. NB These checks should only be for checking suitability for working with children and not other areas of a person's life. Candidates will be informed that this search will take place.
- ensure that appropriate DBS checks are carried out on families hosting students who attend the school.
- report to DBS as soon as possible and at least within one month after the resignation or removal of any person (whether employed, contracted, a volunteer or student) who harmed or poses a risk of harm, to a child or has committed a relevant offence and has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The school recognises that this is a legal duty and failure to refer when the criteria are met is a criminal offence.
- where a dismissal does not reach the threshold for DBS referral the school should consider whether a referral should be made to the Teaching Regulation Agency (TRA). This applies where a teacher has been dismissed (or would have been dismissed had he /she not resigned) and a prohibition order may be appropriate. Circumstances might include "unacceptable professional conduct", "conduct that might bring the profession into disrepute" or a "conviction, at any time, for a relevant offence".
- Ensure the curriculum deals with safeguarding. Firstly, the curriculum, in subjects such as PSHE, discusses relevant issues such as consent with the children in an age appropriate manner. Children are encouraged to explore and discuss such issues. Secondly, the curriculum is designed so that safety issues within the subject are discussed and safe practices taught, such as using equipment properly in PE and Design & Technology. The school makes provision in Computer Science lessons, the AI Curriculum and in PSHE for teaching children to keep themselves safe when working or browsing on-line or when using AI.
- At all times there has to be appropriate staffing levels and when the curriculum involves taking children out of school appropriate and agreed pupil/adult ratios are maintained.
- As part of risk assessments staff organising trips / visits obtain assurances that appropriate child protection checks and procedures apply to any staff employed by another organisation working with the school's pupils on another site.
- Not adhering to this policy may result in disciplinary action.

Preventative Measures

The School:

- expects all pupils to act in accordance with the School's rules and its policies on Acceptable Use,

E-Safety and Use of Personal Devices;
- blocks inappropriate sites and material via its filtering and monitoring system;
- may impose disciplinary sanctions for the misuse, or attempted misuse, of the internet;
- issues all pupils with their own personal school email address;
- prevents pupils from accessing social media, using the School's network and wi-fi;
- offers guidance on the safe use of social networking sites and cyberbullying in PSHE lessons;
- offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe;
- does not allow the use of cameras or mobile phone cameras in toilets, washing and changing areas.

Filters and monitoring
Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies should be doing all that they reasonably can to limit children's exposure to risks from the school's IT system. As part of this process, governing bodies should ensure their school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs in relation to safeguarding risks.

The DSL has the lead responsibility in on-line safety related to filtering and monitoring. The IT manager manages the day to day filtering and monitoring systems in the school.
The filtering and monitoring systems will block harmful and inappropriate content without unreasonably impacting teaching and learning.
The school has effective monitoring strategies in place that meet safeguarding needs.
The filtering and monitoring systems produce a weekly report which are shared with the DSL. An annual review of filtering and monitoring effectiveness across all internet-connected devices and network locations is conducted by the SLT lead with the DSL and IT team. Written records of all checks are systematically retained. Understanding and oversight of filtering and monitoring systems are formally included in the DSL's job description.

Staff will undertake safeguarding and child protection training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring

The school follows the Filtering and monitoring standards for schools and colleges as stated in KCSIE.

The school will communicate with parents and guardians about the systems in place to filter and monitor online use.

The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like:
Appropriate Filtering and Monitoring - UK Safer Internet Centre

The school recognises the importance of meeting cyber security standards for schools and safeguards are in place. All staff undergo cyber security training.

Relationships and Sex Education and Health Education.
Staff should be aware of the opportunities to teach safeguarding in this area of the curriculum. This has been compulsory in schools since September 2020.
The RSHE curriculum will help prepare students for life in modern Britain.

Opportunities to teach safeguarding

The Governing body should ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

In school, relevant topics will be included within Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary pupils) and Health Education (for all primary and secondary pupils).

The school plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

The programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities).

This program will tackle at an age-appropriate stages issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based abuse such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Useful links:
Relationships Education: Relationships and Sex Education (RSE) and Health Education for teaching from September 2026
Teaching Online Safety in Schools
UKCIS making and sharing nudes and semi nudes advice for education settings working with children and young people
Harmful online challenges and online hoaxes - GOV.UK - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Educating Pupils about Online safety, Artificial Intelligence (AI) and Emerging Technology Risks
The School seeks to give its pupils an age-appropriate understanding of how to promote both their own safety and well-being when online. This is done through a variety of means, including the PSHE programme, Computer Science lessons, the AI Curriculum, form time and assemblies. Pastoral staff, the Head of Computer Science and the Head of PSHE liaise over provision so that pupils are well-informed and develop resilience.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:
content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, *misinformation*, disinformation*** (including fake news) and conspiracy theories.
contact: being subjected to harmful online interaction with other users or generative AI applications

that simulate this; for example: peer to peer pressure, deepfakes, 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, e.g. consensual and non-consensual sharing of self-generated intimate images and videos, AI-generated intimate images and video, including deepfakes and online bullying.

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Misinformation - is the unintentional spread of false or misleading content*

*Disinformation** - is the deliberate creation and spread of false or misleading content such as fake news*

Online abuse

The school is fully aware that abuse can take place wholly online and that technology may be used to facilitate offline abuse. Digital abuse is any type of bullying or harassing behaviour that occurs online, through social networking, text messaging, or other technologies. These acts include anything from sending or posting unpleasant or threatening messages about another person to disclosing private information without permission. Similar to traditional forms of bullying, digital bullying is associated with emotional distress and issues regarding school. Technology can be very helpful to survivors of domestic violence, sexual violence, and stalking, but is also often misused by abusers to harass, threaten, coerce, monitor, exploit, and violate their victims. Abusers misuse technology in many ways to stalk, harass, and impersonate victims. Through the "anonymity" of technology, abusers often impersonate victims by creating false social media accounts. Of the types of technology misused by offenders, social media, text messaging, and email are the top three. Abusers seek to disrupt and interrupt the lives of victims.

Many teenagers are abused as a result of sharing partially nude and nude pictures with others online and are subsequently bullied and harrassed. Many victims communicate online with unknown individuals and are consequently at risk. Technology is used to post lies on social media, to post embarrassing videos without permission, to spread rumours, impersonate someone's digital I.D and to send threatening messages. Pupils are encouraged to share their experiences and report abuse online to friends and family and to their teachers including the DSL and DDSLs.

It should be noted that online abuse may well be taking place at the same time as face to face abuse. It should be assumed that online sexual abuse is taking place in school even when there are no specific reports.

Mobile Phones and other Digital Technology

Pupils in Years 5 and 6 and senior school are allowed to bring mobile phones to school because the School appreciates that they are valuable, given the independence our pupils need to develop, travelling to and from school, and as a means of accessing information from home. However once at school then it is a mobile phone-free environment. Pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. The School understands that mobile phones can be used in an anti-social way and for bullying, and always takes instances of this sort of behaviour very seriously. Beyond school pupils are expected to make good, well-informed decisions about appropriate use of their mobile phones and other digital technology. It seeks to educate its pupils about responsible, ethical behaviour through its PSHE curriculum, as well as occasional assemblies.

Mobile phones are not allowed in EYFS. When necessary, staff will use a school tablet to upload images of children involved in learning.

School is a "wearable" technology free environment in which any such item that can film or record is banned from the school premises. Such items include Meta glasses and smart watches which can record, sound, take photographs or film.

Distance Learning

Any lessons utilising video conference applications (we strongly recommend the use of Google Meet, but Screencastify could be used to pre-record short clips) should be through school issued accounts and, preferably, using school issued chromebooks.

All lessons with live participants should be recorded and stored/kept in the teacher's Google Drive (this is in case we need to investigate any safeguarding concerns) When live participants are present, their permission should be given in order to record the session.

Staff should avoid one to one sessions but where this is unavoidable, they must ensure that the session is recorded.

Staff and pupils should dress in an appropriate manner during video conferences and they should be mindful of professional standards and what can be seen or heard in the background.

Staff and pupils should be aware that the Acceptable Use Policy applies during this period as well.

(These procedures refer to allegations or cases of physical or sexual abuse. If a member of staff has reasons to suspect emotional abuse or neglect, those concerns should be raised with the DSL or a DDSL and then, if appropriate, put in writing.)

Definition of abuse

An abused child is any boy or girl under the age of eighteen who has suffered from, or is believed likely to be at risk of physical injury, neglect, emotional abuse or sexual abuse or exploitation. Abuse is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

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.
All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.
For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Children may be abused in a family or institution or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. The following definitions of types of abuse are taken from Keeping Children Safe in Education.

Physical abuse:

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse:

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved,

inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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.

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. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue that could occur in school and all staff should be aware of it and of the school's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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.

Pupils with Special educational needs and disabilities (SEND)

Children with SEND can face additional safeguarding challenges and can be particularly vulnerable. Staff should understand and be mindful of additional barriers that can exist in recognising abuse and neglect in this group of children such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEND can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers

The SEND Code of Practice is a source of information and support is available from specialist organisations including: Kids - SENDIASS

Reasonable adjustments will be made for disabled children and young people, in line with the Equality Act 2010.

Physical Abuse – signs

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSL or DDSL, who will make a referral to children's social care:

- unexplained recurrent injuries or burns
- improbable excuses or refusal to explain injuries
- wearing clothes to cover injuries, even in hot weather
- refusal to undress for PE and Games
- bald patches
- chronic running away
- fear of medical help or examination
- self-destructive tendencies
- aggression towards others
- fear of physical contact – shrinking back if touched
- admitting that they are deservedly punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- fear of suspected abuser being contacted

Emotional Abuse – signs

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSL or DDSL, who will make a referral to children's social care:

- physical, mental and emotional development delay
- sudden speech disorders
- continual self-deprecation ('I'm stupid, ugly, worthless, etc.')
- overreaction to mistakes
- extreme fear of any new situation
- inappropriate response to pain ('I deserve this')
- neurotic behaviour (rocking, hair twisting, self-mutilation)
- extremes of passivity or aggression
- running away

Neglect – signs

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a marked degree, they should immediately inform the DSL or DDSL, who will make a referral to children's social care:

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- emaciation
- untreated medical problems
- no social relationships
- compulsive scavenging
- destructive tendencies

Note: A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone

Sexual abuse – signs

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. If a child shows a number of these symptoms, or any of them to a

marked degree, they should immediately inform the DSL or DDSL, who will make a referral to children's social care:

- being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- medical problems such as chronic itching, pain in the genitals, venereal diseases
- other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- personality changes such as becoming insecure or clinging
- regression to younger behaviour patterns such as thumb sucking
- sudden loss of appetite or compulsive eating
- being isolated or withdrawn
- inability to concentrate
- lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or childminder
- starting to wet again, day or night/nightmares
- become worried about clothing being removed
- suddenly drawing sexually explicit pictures
- trying to be 'ultra-good' or perfect; overreacting to criticism.

Reporting physical abuse

If a member of staff knows or suspects that a pupil has been abused, or is at risk of being abused they should:

- record their concerns or record any disclosures as soon as they are made and note any injuries and any explanation given by the pupil. A report must be added to CPOMS.
- discuss with the DSL or DDSL immediately and pass on any written notes
- maintain confidentiality between professionals

The member of staff should not:

- inform the suspected perpetrator
- Inform the parents
- stop the pupil from disclosing
- ask leading questions
- guarantee confidentiality. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.
- judge the pupil to be lying

The DSL or DDSL will:

- consider whether there is a need for emergency medical treatment
- check the child protection register
- encourage the pupil to discuss the situation
- discuss the case with the Principal and take further steps
- inform parents if appropriate
- record decisions and actions taken, as well as the reasons for these decisions

Reporting sexual abuse

If a member of staff suspects that sexual abuse may have been committed, they should:

- record their concerns or record any disclosures as soon as they are made and note any injuries and any explanation given by the pupil. A report must be added to CPOMS.
- notify the DSL or DDSL immediately
- not attempt to discuss the situation with the pupil or the parent
- maintain confidentiality

If a pupil begins to disclose sexual abuse, the member of staff should:

- facilitate disclosure by finding a suitable place to talk and listen
- tell the pupil what you will have to do next (listen, record, report)
- record the details as they are being told
- notify the designated person immediately and pass on any written notes
- Make a report on CPOMS

The member of staff should not:
- inform the suspected perpetrator
- inform the parents
- stop the pupil from disclosing
- ask leading questions
- guarantee confidentiality. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.
- judge the pupil to be lying
- take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care

The DSL or DDSL will refer the case immediately to the Children's social care department and the police.

Any further discussion with the pupil and contact with the parents will be undertaken by social workers, police and medical staff trained in the investigation of sexual abuse.

Specific Safeguarding Issues

All staff should have an awareness of specific safeguarding issues. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and sharing of nude and semi-nude images or videos (previously referred to as sexting) put children in danger.

Child Sexual Exploitation (CSE)

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

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

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

Staff should be aware of signs of students being vulnerable to child sexual exploitation. Child sex exploitation is very closely linked to child criminal exploitation. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for gifts, to serious organised crime by gangs or groups. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Signs that a child might be at risk may include:

- going missing for periods of time or regularly coming home late
- regularly missing school

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- mood swings or changes in emotional wellbeing
- drug and alcohol misuse
- displaying inappropriate sexualised behaviour

Further help is available at:
https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners
https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

Child Criminal Exploitation (CCE)
CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:
• children who appear with unexplained gifts or new possessions;
• children who associate with other young people involved in exploitation;
• children who suffer from changes in emotional well-being;
• children who misuse drugs and alcohol;
• children who go missing for periods of time or regularly come home late; and
• children who regularly miss school or education or do not take part in education.

Staff should also be aware that many children and young people who are victims of sexual or criminal exploitation do not recognise themselves as such. Members of staff who suspect that a child is at risk of child sexual exploitation should pass these concerns to the DSL or a DDSL.

Both CSE and CCE are forms of abuse. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid

detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism103 National referral mechanism guidance: adult (England and Wales) should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) regardless of gender or sexuality. Exposure to domestic abuse and/or violence can have a detrimental and long-term impact on their health, emotional and psychological well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Staff who believe a child is a potential victim of domestic abuse should raise these concerns with the DSL or a Deputy DSL. Advice on how to help such young people is available through: NSPCC https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/; Refuge and Safelives.

Staff can also call 0800 028 0285 from 8am to 8pm Monday to Friday or email help@nspcc.org.uk

Female Genital Mutilation (FGM)

Staff should be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. Girls at risk of FGM may not be aware of the practice or that it might be conducted on them, so sensitivity should always be shown when approaching the subject. It is a statutory duty on teachers to report cases of FGM in under 18s to the police. Staff should call the police on 101.

Indicators that a girl is a risk might include:

- A girl having relatives who have been subjected to FGM
- Parents wishing for a student to be withdrawn from PSHE
- A visit from a female family elder from a country where the practice is prevalent
- A girl discussing the practice, referring to a ‘special procedure’ or talking about attending a special occasion to ‘become a woman’.
- A child being taken out of the country by a parent or relative for a prolonged period to a country where the practice is prevalent

Indications that a student has already been subjected to FGM might include:

- Difficulty walking or standing
- Spending long periods in the toilet
- Bladder or menstrual difficulties
- Prolonged absence from school with behaviour changes on return
- Reluctance to undergo normal medical examinations

Staff members that believe a girl is at risk of suffering, or suspect they have suffered FGM should discuss the case with the DSL and involve children’s social care as appropriate. 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.

Staff members should be aware of the potential for pupils to be victims of so-called 'honour based' abuse (HBA). This encompasses crimes which have been committed to protect or defend the honour of the family and/or community. These include FGM, forced marriage and practices such as breast ironing. All forms of HBA are abuse and should be handled as such. Staff members who believe that a child may be at risk of HBA should discuss their concerns immediately with the DSL or DDSL who will follow local protocols for liaison with the police and social care.

Bullying

In certain circumstances bullying can be considered a child protection issue. Detailed guidance for dealing with bullying and how the school promotes an anti-bullying environment is published in: the school's anti-bullying policy, the staff handbook and in the school planner and code of conduct booklet for pupils. A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering (or likely to suffer) significant harm. 'Bantering' is unacceptable and where it is sustained will be considered as bullying.

Anti-bullying Strategy

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (for example, taking wages) can also be a factor.

A forced marriage should not be confused with an arranged marriage. Forced marriages are where one or both people are 'forced' into a marriage that their families want, without the valid consent of both people, where physical pressure or emotional abuse is used. Victims are sometimes persuaded to return to their country of origin under false pretences.

Forced marriage is a safeguarding issue; it is a form of child abuse, domestic abuse and a breach of human rights. It can affect men as well as women, some may have disabilities and others may be spouses from overseas. It is therefore important to safeguard any child, young person or adult who may be, or has been subjected to a forced marriage.

Forced marriage is a crime and it is clear that it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This law applies to non-binding, unofficial 'marriages' as well as legal marriages.

If staff have any concerns regarding a young person in school who may be facing a forced marriage it should be treated as a safeguarding issue and reported to the DSL. The school seeks to minimise risk of forced marriage through the school's PSHE programme and by encouraging young people to report their concerns through Tootoot or through the pastoral support system.

Honour Based Abuse

Honour Based Abuse is an international term used by many cultures to justify abuse and violence. It is a crime or incident committed in order to protect or defend the family or community honour (izzat).

Honour based abuse may often be linked to forced marriages, although this is not always the case. Honour crimes and forced marriages are already covered by the law, and can involve a range of criminal offences.

Honour based abuse is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Women are predominantly (but not exclusively) the victims, which can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members.

Males can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they are gay, or if they are believed to be supporting the victim.

Honour abuse cuts across all cultures, nationalities, faith groups and communities, usually where a culture is heavily male dominated. Relatives, including females, may conspire, aid, abet or participate in honour based abuse, for what might seem a trivial transgression.

It should be remembered cultural acceptance in some nationalities does not mean accepting unacceptable practices and traditions.

If staff have any concerns regarding a young person in school who may be facing honour based abuse it should be treated as a safeguarding issue and reported to the DSL. The school seeks to minimise risk of honour based violence through the school's PSHE programme and by encouraging young people to report their concerns through Tootoot or through the pastoral support system.

Individuals may have only one chance to speak to a potential victim of Honour Based Abuse and therefore only one chance to save a life:

- See the victim on his/her own-even if they are accompanied by others.
- See the victim immediately in a secure and private place where you will not be overheard.
- Reassure the victim about confidentiality and explain that you will not give information to family and friends or the community.
- Accept what is said.
- Explain all the options to victims and possible outcomes.
- Recognise and respect his/her wishes.
- Contact as soon as possible the lead worker responsible for honour based violence (if the potential victim is under 16, refer to child protection inter agency guidance ,if an adult is at risk discuss with your adult support and protection lead and refer to inter-agency guidance)
- Agree a safe way to make contact (for example agree a code word)
- Obtain full details to pass on to the lead worker and record these safely.
- Provide contact details and support agencies that can help the victim (FMU, Helplines)
- Consider the need for immediate police involvement, protection and placement away from family this can also include any action to stop the victim from being removed from the UK.
- Do everything you possibly can to keep the victim safe
- Get immediate advice if you are not sure what to do.

National guidance

All current information and practice guidelines for professionals protecting, advising and supporting victims of forced marriages and Honour based violence can be found on the www.gov.uk/guidance/forced-marriage including:

- Multi-Agency Statutory Guidance for dealing with forced marriage 2014
- Guidance is for all persons and bodies who exercise public function in relation to safeguarding and promoting the welfare of children and vulnerable adults.

- Advice is also available from Oldham Safeguarding Children Partnership

Gangs and Serious Violent Crime

Defining a gang is difficult. They tend to fall into three categories: Peer Groups, Street Gangs and Organised Crime Groups.

There is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control, however, there are significant links between different levels of gangs. Activity can include street gang involvement in drug dealing on behalf of organised criminal groups and the sexual abuse of girls by organised criminal groups.

Children in school may be involved in more than one 'gang', with some cross-border movement, and may not stay in a 'gang' for significant periods of time. Children rarely use the term 'gang', instead they use terms such as 'family', 'breddrin', 'crews', 'cuz' (cousins), 'my boys' or simply 'the people I grew up with'.

Safeguarding should focus on young people who are /vulnerable to making the transition to gang involvement as well as those already involved in gangs. Staff should be aware of particular risks to young people involved in gangs from violence and weapons; drugs and sexual exploitation.

The risk or potential risk of harm to the child may be as a victim, a perpetrator or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or mental health problems.

There is potential for a young person involved in gangs to become involved in carrying a weapon such as a knife as part of being involved within that culture. The Home Office and Ministry of Justice's Government Guidance for Child Knife Possession Offences outlines the support and procedures for pupils who may get involved in such activities.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of 'county lines' criminal activity: drug networks of gangs, groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes and a referral through the National Referral Mechanism should be considered.

nationalreferralmechanism@homeoffice.gov.uk.
https://nationalcrimeagency.gov.uk

A child who is affected by gang activity or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Indicators:

- Child withdrawn from family;
- Sudden loss of interest in school. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice);
- Being emotionally 'switched off', but also containing frustration / rage;
- Self harm
- Starting to use new or unknown slang words;
- Holding unexplained money, gifts or possessions;
- Staying out unusually late without reason, or breaking parental rules consistently;

- Sudden change in appearance – dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour;
- Dropping out of positive activities;
- New nickname;
- Unexplained physical injuries, and/or refusal to seek / receive medical treatment for injuries;
- Graffiti style 'tags' on possessions, school books, walls;
- Constantly talking about another young person who seems to have a lot of influence over them;
- Breaking off with old friends and hanging around with one group of people;
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members;
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs;
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past;
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhoods.

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. Advice for schools is provided in the Preventing youth violence and gang involvement - GOV.UKt and its Criminal exploitation of children and vulnerable adults ... - GOV.UK:

Any teacher, or member of staff who has concerns that a child may be at risk of harm as a consequence of gang activity should contact the DSL or the police for the area in which the child is currently located. The DSL will treat gang related activities as a safeguarding issue and will make a referral if necessary to the "Duty and Advice" (MASH) team following Oldham Safeguarding Children Partnership guidelines.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

If a child has a social worker, the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. Social care assessments need to consider children being harassed outside the home. All parts of contextual safeguarding. The school will provide as much information as possible as part of any referral process.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support

School has an important role to play in supporting the mental health and wellbeing of pupils.

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.

Children suffering from mental health issues should initially be supported through the pastoral provision within the school and by the school Medical Officer and where necessary through the school counsellors. School will access a range of advice to help identify children in need of extra mental health support, including working with external agencies. Further help and advice is available at:

Mental health and behaviour in schools

Children with family members in prison

Children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation and poor mental health.

Staff should raise any concerns with the DSL or a Deputy who will liaise closely with the relevant agencies. https://www.nicco.org.uk/ can provide useful support

Homelessness

Being homeless or being at risk of being homeless presents a real risk to a child's welfare. The DSL will make contact with the Local Housing Authority to raise / progress concerns at the earliest opportunity. Homeless Housing Advice: 0161 393 7117.

For 16 and 17 year olds living independently from their parents or guardians the DSL should ensure a referral is made to children's services based upon the child's circumstances.

When reporting a case of homelessness the local authority should follow the statutory guidance: Homelessness code of guidance for local authorities - Download this guidance - Guidance - GOV.UK

Child on child abuse

There is a zero-tolerance approach to **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 and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Staff should recognise 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. Children should be encouraged to report all possible instances of child on child abuse.

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 the DSL or a DDSL.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours 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.

This is a complex area. Staff should recognise that children are capable of abusing their peers. Abuse is abuse and should never be passed off as "banter", "just having a laugh" or "part of growing up" or "boys being boys." There are different gender issues that can be prevalent when dealing with child on child abuse for example: physical abuse, girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. It is more likely that girls will be victims and boy perpetrators, but all child on child abuse is unacceptable and will be taken seriously.

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within the school's safeguarding practice where appropriate.

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 peers (also 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);
- physical assault and harm, or the threat of harm with a weapon;
- misogyny, misandry, sexism and homophobia;
- harmful sexual behaviour which is any sexual action by a person under 18 that is developmentally inappropriate, coercive, or abusive;
- 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;
- the making or sharing of nudes and semi-nudes (whether self-generated, shared consensually/non-consensually, or created/manipulated using Artificial Intelligence and deepfake technology).
- 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. This is a criminal offence; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents.

A bullying incident should be addressed as a child protection concern where there is reasonable cause to suspect that a child is "suffering or is likely to suffer significant harm". (As stated in the Children Act 1989 Children Act 1989 - Legislation.gov.uk) Staff may need to draw on external services to support a child who is experiencing bullying or to help deal with an underlying issue which has contributed to a child engaging in bullying. Where this is the case, staff should report their concerns to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead or to their local authority social care. Children's services or the police should be informed when bullying has reached a point where a child is suffering or is likely to suffer significant harm. Bullying at this level goes beyond the threshold of an internal school investigation.

The sexual abuse of children by children is a specific example of Child on child abuse. Child-on-child sexual abuse and sexual violence is a form of child sexual abuse in which a child is sexually abused by one or more other children or adolescents, and in which no adult is directly involved. While this includes when one of the children uses physical force, threats, trickery or emotional manipulation to elicit cooperation, it also can include non-coercive situations where the initiator proposes or starts a sexual act that the victim does not understand the nature of and simply goes along with, not comprehending its implications or what the consequences might be. Child-on-child sexual abuse is an overt and deliberate action directed at sexual stimulation.

Child on child abuse may also manifest itself as Sexual Harassment.

Child on Child Sexual violence and sexual harassment

Sexual violence refers to sexual offences under the Sexual Offences Act 2003: rape, assault by penetration or sexual assault.

Reports of sexual violence and sexual harassment are likely to be complex. Decisions will be made on a case-by-case basis with the DSL taking a leading role, using their professional judgement and

supported by other agencies such as the Oldham "Duty and Advice" (MASH) team and the police as required. Harmful sexual behaviour can occur online and/or offline and can occur simultaneously between the two. It should be explained to children that the law is in place to protect rather than criminalise them.

The school makes clear that:

- Sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- It will not tolerate or dismiss such behaviour as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- That it will challenge (potentially criminal in nature) behaviour such as grabbing bottoms, breast and genitalia and flicking bras and lifting up skirts.
- Upskirting is now a criminal offence.
- It understands that all of the above can be driven by wider societal factors beyond school, such as everyday sexist stereotypes and sexist language.
- All victims will be reassured that they are being taken seriously and the school will ensure they are supported and kept safe. A victim should never be made to feel that they are creating a problem by reporting sexual violence, sexual harassment, or made to feel ashamed for making a report.
- Understanding intra-familial harms is important and any necessary support should be offered to siblings and all victims following incidents.
- If a staff member receives a report of sexual violence or sexual harassment they should follow the guidance headed "guidance to an adult" of this policy headed "Guidance to an adult receiving disclosure from a pupil about alleged abuse". If possible, it is good practice for two members of staff to be present.
- Following a report of sexual violence, the DSL (or a Deputy) will make an immediate risk and needs assessment. The risk assessment will be recorded in writing and kept under review. 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 will consider: the victim, especially their protection and support; the alleged perpetrator; all the other children (and if appropriate, adult students and staff) and any actions that are appropriate to protect them. The starting point should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. The school will engage with both the victim's, and alleged perpetrator's parents unless there is a reason to believe that doing so would put the child at additional risk. Where the incident has been referred to social care and / or the police the DSL will work with these agencies to ensure a consistent approach to information sharing.

Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child.
Family Help could have an important role in supporting vulnerable children. Family Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

In dealing with a report the DSL (or Deputy) will consider:

- The wishes of the victim and how they wish to proceed.
- The nature of the incident, including whether a crime may have been committed
- The ages and developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one-off or a sustained pattern of abuse
- Any ongoing risks to the victim or others (children and/or staff)
- Wider context (contextual safeguarding) including intra-familial harms
- Above all what is in the best interests of the child

Options to manage a report

Each case will be dealt with on a case-by-case basis. If a report is to be made to "Duty and Advice" (MASH) and/or the police, the DSL should discuss with the relevant agency how the alleged perpetrator should be informed of the allegations. Whichever option is employed it will be underpinned by the principle that sexual violence or sexual harassment is never acceptable and never tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded.

Options include:

- Manage internally
- Family Help
- Referral to children's social care (where a child has been harmed, is at risk of harm, or is in immediate danger). Unless there are compelling reasons not to, parents will be informed of such a referral.
- Report to the police. This would generally be in parallel with a report to social care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed to the police. Unless there are compelling reasons not to, parents will be informed that a report has been made to the police. School will consult the police about what information can be disclosed to staff and others.

Working with Statutory safeguarding partners

If required, the designated safeguarding lead (or a DDSL) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's policies and responses.
The designated safeguarding lead (and DDSLs) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

It is good practice to regularly review actions to look for patterns of concerning behaviour.

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. Advice should be sought from the designated safeguarding lead (or DDSL)

Ultimately, the designated safeguarding lead (or DDSL) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or DDSL) 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.

Sexual Harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is referenced in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It should be assumed that sexual harassment is taking place in school even when there are no specific reports.

Sexual Harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools should consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos, including AI-generated intimate images and videos. (UKCCIS UK Council for Child Internet Safety (UKCCIS) - GOV.UK sharing of nude and semi-nude images or videos (previously referred to as sexting) advice provides detailed advice for schools
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

The school seeks to minimise the risk of child on child abuse through the teaching of safeguarding issues through the school’s PSHE programme and assembly. The school’s anti-bullying policy is discussed at least annually with pupils. All pupils from Year 3 to Year 13 are issued with safeguarding cards detailing who they can talk to if they have concerns about their own or another pupil’s safety.

Harmful sexual behaviour (HSB)

Children’s sexual behaviour ranges from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

The Harmful Sexual Behaviour Support Service, run by SWGfL in partnership with the Marie Collins Foundation, is now available to safeguarding professionals across England and provides the tools to equip and empower practitioners to address the alarming normalisation of harmful sexual behaviour in children and young people.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed ‘Shore Space’, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else’s sexual thoughts and behaviour.

Upskirting

Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Allegations of child on child abuse will be dealt with using the procedures as set out in "child protection procedures" of this policy. Further information on how the school deals with incidents between pupils can be found in the school's: Behaviour, Anti-bullying, Exclusions and Investigating Incidents and Complaints Between Pupils policies. Victims of child on child abuse will be supported by appropriate pastoral staff and will be offered counselling with the school counsellor.

If a member of staff has reasonable cause to suspect that a pupil is being abused by another pupil or that they are suffering, or likely to suffer significant harm, they should immediately discuss their concerns with the DSL or a DDSL who will then ensure a co-ordinated approach and refer any abuse to the relevant agencies. This includes the electronic circulation of inappropriate images of pupils e.g. images shared via a mobile phone, handheld device or social website. Details of acceptable use of ICT and measures taken to promote E-Safety can be found in the school's E Safety Policy.

Mobile telephones

The following rules about mobile phones are in the school's Behaviour policy and communicated clearly to pupils. School is a mobile phone-free environment. However, pupils may bring a mobile telephone to school only under the following conditions:

- the mobile phone must be switched off as the student arrives at the school premises. Pupils in years 7 to 11 must keep their mobile phones in their lockers.
- pupils in the Nursery and Infants are not permitted to bring mobile phones to school. In the Juniors pupils who bring a mobile phone to school in order to facilitate travel must hand the device to a staff member on arrival at school. The device will be kept in a safe place during the school day.
- pupils must never use a mobile phone to record images of any other pupil, member of staff or any member of the school community. This is an infringement of the Human Rights Act and the Data Protection Act and pupils will have their phone confiscated; it will only be returned to parents and in addition, pupils will be subject to a serious school sanction.
- if they are given express permission to do so i.e. on a school trip or a sports fixture.

Police / criminal action

The DSL and DDSLs will liaise with the safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. WHEN TO CALL THE POLICE helps safeguarding leads understand when they should consider calling the police and what to expect when they do.

During any police investigation, or criminal action as a result, the school would work closely with the police and social care to manage any implications and safeguard children. The risk assessment will be a key part of such a process. Consideration will be given to:

- The victim being able to continue in their normal routine.
- Disciplinary measures against the alleged perpetrator; whilst ensuring that any action taken does not jeopardise or prejudice the police investigation.
- The school will do all it can to protect the anonymity of any children involved in any report of sexual violence of sexual harassment; including being mindful of the potential impact of social media.

At the end of any criminal investigation the school will review its risk assessment and ensure relevant protections are in place as well as considering any suitable action under the school's behaviour policy. Consideration will be given to:

- Expectations regarding future conduct
- Appropriate restrictions on the perpetrator
- The protection of the victim and perpetrator from bullying and harassment for example on school transport

The DSL will liaise with the Principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.This should include being aware of the requirement for children to have an Appropriate Adult. For further details see statutory guidance PACE Code C 2019 - GOV.UK

It is an expectation that the appropriate adult will support, advise and assist the young person and also observe that the police are acting properly and fairly, respecting the young person's rights and entitlements and inform an officer of the rank of inspector or above if they consider that they are not.

An "appropriate adult" would usually be a parent, guardian or social worker. Children must never be interviewed alone.

Children and the Court System

KCSIE 2026 directs schools to two guides that support children in the court system, one for 5 to 11 year olds (HM Courts and Tribunals Service, 2017a) and the other for 12 to 17 year olds (HM Courts and Tribunals Service, 2017b). There is a Ministry of Justice information service which helps parents make child arrangements without going to court and for them to understand alternative resolution options.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice provides an information service which helps parents make child arrangements, without going to court and for them to understand alternative resolution options. They have also launched an online child arrangements plan tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Unsubstantiated, unfounded, false or malicious reports

When responding to allegations which are found to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else.

Ongoing support

This will be tailored proportionally on a case-by-case basis considering: the age and development stages of the victim and perpetrator; the nature of the allegations; potential risk for further abuse; the needs and wishes of the victim. The school will establish if the victim would benefit from a designated trusted adult to talk about their needs. The school will also recognise that the perpetrator may be in need of support, as their behaviour may be a sign of them having been abused, and they may need a high level of support in helping them understand and overcome the reasons for their behaviour. Staff should be aware of the possible health needs that might arise following sexual assault, such as physical, mental and sexual health problems and unwanted pregnancy. If the victim or perpetrator moves to another educational institution as a result the DSL will take responsibility for ensuring the new institution is aware of any ongoing support needs.

Ongoing support for victims is available from:

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs). Contact details can be found at Rape Crisis https://rapecrisis.org.uk/ and The Survivors Trust https://thesurvivorstrust.org/

- Child and adolescent mental health services (CAMHS)
- Rape Crisis Centres
- Internet Watch Foundation https://www.iwf.org.uk/

Useful support:
The NSPCC 0808 800 5000 help@nspcc.org.uk
The Anti-bullying Alliance
helpline@saferinternet.org.uk
Thinkuknow: CEOP Education

Children absent from education

A child with unexplained and or persistent absences is a potential indicator of abuse or neglect. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage. The school will inform the local authority of any pupil who fails to attend school regularly, or who has been absent without the school's permission for a continuous period of 10 days or more. Children who are absent from education run the risk of sexual and criminal exploitation. It is important that staff try to understand the causes of children who are absent from education.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the unauthorised absence and children absent from education procedures. School will inform the local authority of any pupil deleted from the admission register under circumstances as outlined in Keeping Children Safe in Education.

Children who are absent from school or missing from school for sustained periods of time must be monitored and staff must be proactive in following up absence. Safeguarding risks increase substantially for those absent from education. Staff monitoring attendance should work closely with the DSL.

School will work with children's services where school absence indicates safeguarding concerns.

Alternative Provision (AP)
Where school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.

Should a Hulme pupil be placed in AP we will:

- obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.
- Check to know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- Regularly review the alternative provision placements that are made. Reviews will be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.
- Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

The sharing of nude and semi-nude images, including where generated by AI

The production and distribution of nude and semi-nude images, including those generated by AI involving anyone under the age of 18 is illegal and needs very careful management for all those involved. A member of staff that becomes aware of an incident of sharing of nude and semi-nude images or videos (previously referred to as sexting) should report this immediately to the DSL or a DDSL.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual making and sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

A device can be examined, confiscated and securely stored if there is reason to believe it contains indecent images or extreme pornography. The search must be in accordance with the school's Safeguarding and Restrictive Interventions and use of Reasonable Force policies and be conducted by the Principal or a person authorised by them. A DSL or DDSL should be present and the search conducted by a member of the same sex.

The DSL will record all incidents of the sharing of nude and semi-nude images, including decisions taken with regard to how to respond and the reasons for these decisions. In applying judgement to each incident, the DSL will assess whether the incident is 'aggravated' or 'experimental' and consider the following:

- Is there a significant age difference between the sender/receiver involved?
- The age of the sender.
- Is there any external coercion involved or encouragement beyond the sender/receiver?
- Do you recognise the child as more vulnerable than usual i.e. at risk?
- Is the image of a severe or extreme nature?
- Is the situation isolated or has the image been more widely distributed?
- Are there other circumstances relating to either sender or recipient that may add cause for concern i.e. difficult home circumstances?

If any of these circumstances are present, then the incident should be referred to children's social care and reported to the police.

If none of these circumstances are present, then the incident can be managed within the school without escalating to external services. In managing an incident in school the DSL will seek to ensure:

- The image is deleted from all storage devices and facilities
- The sender is appropriately supported with guidance as to future conduct and counselling is appropriate
- Support is given to the recipient if appropriate
- The sender's parents are informed
- Gossip about the incident is minimised

Useful advice on this subject is provided by found here or at;
UK Council for Internet Safety (UKCCIS) - GOV.UK

Photographing and Videoing in the Early Years and Infants

There has been a lot of controversy recently about adults photographing and filming young people. The concerns are genuine, however at Nursery and Infants we have taken a sensible balanced approach, which allows parents to photograph and file providing they follow certain guidelines:

- Parents consent to school taking photographs for use for school and publicity purposes by signing a permission slip upon entry to school.

- Separate written permission is requested for photographs to be published on the internet.
- Parents are allowed to video/photograph school performances so long as it is only for their own use and will not be displayed anywhere else.
- Staff are given guidance on the appropriate use of mobile devices for recording educational activities. Staff must not use their personal mobile devices to take or store images of students. If they are recording images of students for educational or publicity purposes, staff should use school equipment.
- Images will be uploaded to a secure repository and should then be removed from devices.
- Mobile phones are not allowed in EYFS

These principles also apply in the Junior and Senior Schools.

Swimming - Looking after children in this environment Health and Safety - Swimming Pool Normal and Emergency Operating Procedures

Very Young Children

We recognise that special arrangements are needed for our youngest children in the EYFS & Prep when undertaking swimming and the following measures are in place:

We are aware that swimming lessons are an intimate environment and therefore some children may feel vulnerable both when getting dressed and undressed and whilst taking part in their swimming lesson. Children are reminded on a regular basis in key worker groups and during class discussions, that they can speak to their class teacher or key worker should they ever feel worried or unhappy about anything. Foundation Stage children are taken to their swimming lessons on the school minibuses. The staff member in charge of each swimming group will always carry their mobile phone with them in case of an emergency. Staff members will not, under any circumstances, use their mobile phone whilst at swimming other than to call for help in an emergency or to contact a member of staff who are still on site at the Medical Office and Infants.

Occasionally staff members will take the class tablet to swimming to take photographs of the children for their Learning Journey, the newsletter or for other advertising purposes. Swimming shots of the children are taken when the children are in the water and are head shots of the children. Staff members will only take photographs of children where consent has been given by their parents.

Early Years pupils

Swimming lessons for the Early Years pupils takes place at the Hulme swimming pool. The Prep School has sole use of the pool and changing rooms during their swimming lessons.

Staff members help to prepare pupils for swimming lessons by talking to them before their first few lessons about what to expect and the routines that will be followed. Pupils are given the opportunity to ask any questions that they may have.

On arrival at the swimming baths the children are taken directly to the changing rooms. Before entering the changing rooms, pupils are reminded that the floor may be slippy and that it is important to walk at all times.

There is always an appropriate number of staff members to support the children with changing from their school uniform into their swimming kits. Pupils are helped to get dressed and undressed by members of Hulme staff and occasionally by parent helpers who have had a DBS check.

KS1 Pupils

Swimming lessons for KS1 pupils take place at the Hulme swimming pool. The Prep School has sole use of the pool and changing rooms during their swimming lessons.

As with the Early Years pupils, staff members help to prepare pupils for swimming lessons and particularly the change of venue, by talking to them before their first few lessons about what to expect and the routines that will be followed. Pupils are given the opportunity to ask any questions that they may have.

Upon entering the changing room the children are separated into boys and girls and are encouraged to get undressed and dressed independently and to focus on this task at all times. Should the children require any assistance they are told that they can ask for help from the members of staff who are present. Members of staff are always a familiar adult that the children know and will therefore hopefully feel comfortable with.

Senior School Swimming

Children are left to change with the minimal of staff intervention in the changing room to allow privacy. Staff members will not, under any circumstances, use their mobile phone whilst at swimming other than to call for help in an emergency.

Legal threshold

When responding to concerns over a child's safety and welfare, the School will follow both the Oldham Safeguarding Children Partnership and the more detailed guidance on thresholds found in the Oldham Safeguarding Children Partnership Multi- Agency Levels of Need (Threshold) Document.

The School will always make a referral where:

- A child is in immediate danger or suffering or likely to suffer significant harm
- With the agreement of the child and/or a person with parental responsibility (depending on the age of the child), a child is likely to benefit from family support services. A referral will be made immediately if a child is in immediate danger or is suffering or likely to suffer significant harm. Referrals will be made even where it is known that Children's Social Care is already involved with the child and/or his or her family.

The Oldham Safeguarding Children Partnership publishes a threshold document that includes:

- the process for Family Help and the type and level of family help services to be provided
- the criteria, including the level of need, for when a case should be referred to local authority Children's Social Care for assessment and for statutory services under (a) section 17 of the Children Act 1989 (children in need) and (b) section 47 of the Children.

Victim support

All pupils know that there are adults to whom they can turn to if they are worried. The names and identities of these individuals, including the School Medical Officer, are displayed across the School. Our support to pupils includes the following:

- information as to whom a child might turn to for advice, including confidential helplines and web addresses for external specialists such as ChildLine, is displayed across the School. All children have an individual card which outlines what to do if they have a safeguarding concern and where to seek help.
- the School Medical Officer and the Counsellors offers counselling and other support services
- regular lessons on E-safety and ensure that all pupils understand and adhere to the School's policies in this area.

Children who are lesbian, gay, bisexual

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is

perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. An LGBTQ+ group called 'Prism' has been set up by staff. This group meets once a week for a discussion group for current affairs concerning LGBTQ+, a place for creative activities or to complete homework, or even just to chat.

Gender Questioning Pupils

When supporting a gender-questioning child, the school takes a cautious, child-centred, and risk-based approach involving parents (unless doing so poses a significant risk of harm). In accordance with KCSIE 2026, children are prevented from using toilets or changing rooms designated for the opposite biological sex. Where requested or appropriate, single-occupancy alternative facilities can be provided.

Prevent Duty

Background

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, (Update 31 December 2023) to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

It is essential that staff are able to identify children who may be susceptible to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

Risk Assessment

The school will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The school will liaise with the police and Oldham Safeguarding Children Partnership in order to assess and monitor the risks affecting children and young people in the local context and to access appropriate training provided by the local authority.

Staff should also be aware of the increased risk of online radicalisation. Terrorist organisations seek to radicalise young people through the use of social media and the internet.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should be alert to patterns of behaviour that show a pupil is engaged in an ideology, is intent on causing harm or capable of committing violent acts. Signs might include: demonstrating 'them and us thinking' or dehumanising other groups through derogatory language. For very young children, staff should be mindful of parents' behaviour at

drop off and pick up time. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Even very young children may be susceptible to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but, as with any other safeguarding risk, they must take action when they observe behaviour of concern.

Staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. The 'Counter-Terrorism Act 2015' means that each Local Authority must have a 'Channel Panel'. Links to Oldham's Prevent Duty and Channel can be found here.

Effective engagement with parents/the family is also important as they are in a key position to spot signs of radicalisation. Concerns raised by family members should be discussed with the DSL or a DDSL immediately. Referrals to Channel require the individual's consent and it is advisable to discuss potential referrals with the family.

Staff training

Senior pastoral staff have received Prevent training to equip them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. All academic staff are required to complete a module on Channel General Awareness training. Details can be found at:

http://www.elearning.prevent.homeoffice.gov.uk/

The DSL and DDSLs have received high level WRAP training at Oldham Strategic Safeguarding Partnership and through online courses.

Staff are aware of the Managing risk of radicalisation in your education setting - GOV.UK website which provides tools and resources to help recognise and address extremism and radicalisation in young people.

Making a referral to Prevent - GOV.UK

For advice about making a Prevent referral:
Greater Manchester Police - 0161 856 6362
CTPNW.Prevent@gmp.police.uk

Visiting Speakers

Members of staff inviting visiting speakers into school must ensure that the speaker and material to be presented is appropriate and will not potentially expose pupils to extremist ideas or terrorist ideology. When inviting visiting speakers into school staff must follow the procedures laid down in the Visiting Speakers Protocol. Visiting Speakers Protocol
Approval must be given by the DSL, Principal or Head of Prep.

All staff organising a visiting speaker must complete a Google Form detailing the checks that have been made to test the suitability of the visiting speaker. A link to this form can be found in the Visiting Speakers Protocol. All members of SLT have access to the register.

E-safety

The school takes steps to ensure that children are safe from terrorist and extremist material of any kind when accessing the internet in school and ensures that suitable filtering is in place. E-safety is embedded in the school's PSHE programme and equips pupils to stay safe online, both in school and outside.

Building pupils' resilience to radicalisation

The school seeks to build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making, as well as the risks associated with terrorism, for example through the school's PSHE programme. The school seeks to develop the knowledge and skills in our pupils to be able to challenge extremist arguments. The school promotes the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values, policy (details can be found in the school's promoting British values policy).

If staff have a concern

If a member of staff has a concern about a particular pupil, or parent, they should discuss this with the DSL or a DDSL and where deemed necessary, with children's social care.

Where the concern is about a member of staff or a Governor they should discuss this with the Principal. Where the concern is the Principal, the matter should be referred to the Chair of Governors, Mr Gavin Wheeldon, who can be contacted via the Clerk to the Governors, Mrs Kathryn Shaw, clerk-to-governors@hulmegrammar.org, without the prior knowledge of the Principal. Referrals can be made to the Oldham "Duty and Advice" team (MASH) on 0161 770 3790.

Staff can also contact Oldham police on **0161 856 8929** or dial 101 (the non-emergency number). For urgent issues staff should phone 999 or the anti-terrorist hotline: 0800 789 321.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to: counter.extremism@education.gsi.gov.uk.

This helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

Whistleblowing (Inappropriate behaviour displayed by members of staff)

Staff should be alert to instances of inappropriate behaviour displayed by other members of staff and pass on their concerns to the Principal (If the concern is about the Principal, the concern should be referred to the Chair of Governors, Mr Gavin Wheeldon who can be contacted via the Clerk to the Governors, clerk-to-governors@hulmegrammar.org without the prior knowledge of the Principal). For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images. Further details of what would be considered inappropriate behaviour are set out in the Staff Code of Conduct Policy

Further details can be found in the Whistleblowing Policy. Whistleblowing Policy

What staff should do if they have concerns about unsafe safeguarding practices within school

Staff and volunteers should raise any concerns about poor or unsafe practice in the school's safeguarding regime with the Principal. Where a member of staff feels that they are unable to raise this matter with the Principal or that their genuine concerns are not being addressed, they can raise the matter directly with Chair of Governors and the Strategic Safeguarding Partnership or the LADO (contact details are to be found in the "key contact") section in the policy.

We will follow our managing allegations policies, informing the LADO as appropriate, when receiving an allegation about an individual or the organisation, concerning incidents that happen when the school's premises are being used by external providers.

Keeping children safe in out-of-school settings - GOV.UK

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Written records

All written records, notes etc will be held in a confidential file and/or on CPOMS. The DSL will record decisions and actions taken as well as the reasons for decisions taken. The Principal and designated persons will have access. No explicit notes are to be put on the pupil's written or electronic file.

When children leave the school, the DSL will ensure that any child protection files are transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The DSL should ensure secure transit, and confirmation of receipt should be obtained. Safeguarding files will be transferred separately from the main pupil file.

For vulnerable students who leave year 13 to attend Higher Education, permission will be sought from the student to give their consent to allow the school to share safeguarding information with another educational establishment or employer. In line with the Data Protection Act 2018 - Legislation.gov.uk The purpose of sharing information is to help keep students safe and protected as they transition from susceptible children to ***potentially*** young adults at risk.

Multi-agency working

Governing bodies and proprietors should ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

The Governing body, and their senior leadership teams, especially the DSL, should make themselves aware of and follow their local arrangements.

Data Protection

It is recommended that all education professionals read the DfE Data Protection guidance for schools. This guidance is aimed at school staff and governors and sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches. 'Safeguarding of children and individuals at risk' serves as a processing condition allowing special category data to be shared without consent. Pupil data should be withheld from a Subject Access Request (SAR) response if the 'serious harm' test is met.

Other documents available

Behaviour Policy
Anti-bullying policy
Restrictive Interventions and use of Reasonable Force Policy
First Aid Policy
Health, Safety and Environment Policy
Safer Recruitment, Selection and Disclosure Policy
Staff Handbook / Code of Conduct
E-safety Policy
Volunteer Policy
Self Harm Policy

Key Contact Details

LADO: Colette Morris
Address: Rock Street Centre, Rock Street, Oldham
colette.morris@oldham.gov.uk
Mobile: 07583 101863
Office No: 0161 770 8870

LADO: Wendy Nicholls
Address: Rock Street Centre, Rock Street, Oldham
wendy.nicholls@oldham.gov.uk
Mobile: 07974 619094
Office No: 0161 770 0008

Oldham Children's Social Care and the Multi-Agency Safeguarding Hub (MASH)
Level 9, Oldham Civic Centre, Oldham
Telephone: 0161 770 7777
Email: child.mash@oldham.gov.uk

Children's Social Care Emergency Duty Service (Out of hours)
Telephone: 0161 770 6936

Oldham Safeguarding Children Partnership
www.oldham.gov.uk/lscb/
Email: olscb@oldham.gov.uk
Business Manager: Jayne Haigh
Jayne.haigh@oldham.gov.uk

Oldham Safeguarding Advisor for Education:
Stacey Brackenridge
Email: Stacey.brackenridge@oldham.gov.uk
Telephone: 0161 770 8868 or 07753715566
Oldham Prevent Co-ordinator:
Nicole Lamont
Email: Nicole.lamont@oldham.gov.uk

Family Help Partnership Officer - South District
Lauren Shaw
Telephone: 07483937439
Email: Lauren.Shaw@oldham.gov.uk

Greater Manchester Police Public Protection Investigation Unit
Email: oldham.ppiu@gmp.pnn.police.uk
Child Protection: Oldham 0161 856 9048 or 0161 856 8962
Domestic Abuse: 0161 856 4551

ChildLine contact number: 0800 1111

Tameside MASH
Telephone: 0161 342 4101
Emergency Duty Team: 0161 342 2222

Manchester Safeguarding Partnership

Telephone: 0161 234 5001

Rochdale MASH
Telephone: 0300 303 0440
Emergency Duty Team: 0300 303 8875

Bury MASH
Telephone: 0161 253 5678
Emergency Duty Team: 0161 253 6606

Guidance on Child Protection Issues

Parental responsibility

- The school will establish who has parental responsibility for each pupil.
- School records will accurately reflect the home situation so far as is possible.
- Consent for school trips, medical attention, etc must be obtained from those with parental responsibility.
- If a pupil is hurt in an accident, the school must contact those with parental responsibility.

Good practice when dealing with children

- Treat all young people with respect; watch the language and tone of voice used and body language.
- Avoid inappropriate, intrusive or unnecessary physical contact with pupils. Touching may be necessary to prevent pupils from hurting themselves and may be a natural way to respond to someone in distress. Everyone should be sensitive to what is appropriate and what is not and should be conscious of situations in which their actions, however well intentioned, could be misconstrued by others or be harmful.

Details of circumstances when physical intervention by a member of staff is appropriate are set out in the school's Restrictive Interventions and use of Reasonable Force Policy e.g. to prevent a pupil causing personal injury to, or damage to the property of, any person (including themselves). This policy asserts that on no occasion should such physical contact be used as a punishment. Further guidance for specialist PE or music tuition is contained in the Staff Code of Conduct.

- Do not use nicknames or terms of endearment to a pupil which may be open to misconstruction.
- Do not scapegoat, ridicule, bully or strike a pupil.
- Adults should not use toilets that are designated for use by pupils.
- If interviewing a pupil preferably (a) have a colleague present or (b) conduct the interview in a public place. (This would include classrooms) If a private interview is essential
    - sit away from the pupil
    - have furniture between you

Guidance to an adult receiving disclosure from a pupil about alleged abuse

- A child is likely to make a disclosure to someone they trust. This could be anyone on the school staff.
- Listen carefully. Take the pupil seriously and show sympathy and understanding. Do not be judgmental about his/her story.
- Reassure him/her that he/she is not to blame for any abuse that he/she may have experienced.
- Affirm the pupil's feelings as expressed; do not tell him/her how he/she should feel.
- Avoid persistent questioning and avoid silencing him/her by indications of disbelief.
- Do not confuse taking what he/she has said seriously with believing what he/she has said.
- Do not guarantee confidentiality. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.
- Explain that you will have to speak to the DSL or a DDSL.

- Make a record of the disclosure. Best practice is to wait until the end of the disclosure and write up a full summary. Staff members should devote their full attention to the child. If making notes during the disclosure it is important to remain engaged with the child and not be distracted by the note taking. It is essential that a written record is made
- Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note maker.

The responsibility of the adult to whom a disclosure about alleged abuse is made is to observe, record and report to the designated person. Nothing more is required.

It is the responsibility of those carrying out an investigation (police, social services) to question and to assess the evidence which will be tested later by trained professionals.

Staff Facing an Allegation of Abuse (Including supply staff)

Children who report to a teacher (or other member of staff) that a member of staff (teaching, support or volunteer) has abused them must be listened to and heard, whatever form their attempts to communicate their worries take. Staff should be aware that concerns tend to grow and may be apparent before someone makes an allegation.

Where it is identified that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the DSL or either of the Principal will contact children's social care and as appropriate the police immediately.

The following points give guidance on how to deal with a pupil who makes an allegation:

- listen carefully; take the pupil seriously and show sympathy and understanding. Do not be judgmental about the pupil's story;
- the pupil should be listened to but not interviewed or asked to repeat the account. Avoid questions, particularly leading questions;
- the pupil should not be interrupted when recalling significant events;
- all information should be noted carefully, including details such as timing, setting, who was present and what was said, in the pupil's own words. The account should be obtained verbatim or as near as possible;
- care should be taken not to make assumptions about what the pupil is saying or to make interpretations;
- listened to means just that; on no account should suggestions be made to pupil as to alternative explanations for their worries;
- the written record of the allegations should be signed and dated by the person who received them as soon as practicable;
- such an allegation should be reported immediately to the Principal or in cases where the allegation is against the Principal, the Chair of Governors, without the knowledge of the Principal.
- in the absence of the Principal, an allegation should be reported to the Chair of Governors.
- all actions subsequently taken should be recorded.

A member of staff must not promise confidentiality to a pupil who makes an allegation. In responding to a pupil who makes disclosures, account should be taken of the age and understanding of the pupil and whether the pupil or others may be at risk of significant harm. While acknowledging the need to create an environment conducive to speaking freely, the member of staff should make it clear to a pupil who approaches him/her asking for confidentiality that, he/she will need to pass on what has been told so as to ensure the protection of the pupil(s), in accordance with the local procedures. Within that context, the pupil should then be assured that the matter will be disclosed only to people who need to know about it. The support needs of a pupil who expresses concerns about significant harm should be considered and met, utilising resources within and/or beyond the school as necessary.

This guidance should be followed where it is alleged that anyone working in the school, including trainee teachers, supply teachers and volunteers has:

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

The LADO must be informed at the earliest opportunity.

It is important to note that schools have a responsibility to fully explore concerns about supply staff.

Allegations about supply teachers must be explored fully, in line with the school's safeguarding policy relating to allegations of abuse. Disciplinary procedures must be followed even though the school is not the supply teacher's employer. The school cannot simply cease using the teacher. The school will inform supply agencies about the process for managing allegations.

The Principal should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst an investigation is carried out.

Immediately an allegation is made, the Principal (or, in cases where the allegation is against the Principal, the Chair of Governors) should:

- obtain written details of the allegation, signed and dated from the person who received the allegation (not from the pupil who made and/or was the subject of the allegation) and countersigned and dated by the Principal (the Chair of Governors where the allegation is against the Principal);
- record any information about times, dates, locations and names of potential witnesses.

Immediate contact (within 1 working day) should be made with the LADO and further procedures and actions taken on the advice of the LADO.

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the school when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, local authority children's social care, the school or college, or a combination of these. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff.

In some cases the school may need to arrange an independent investigator, from outside the school.

Discussions with the LADO should be recorded in writing and communication with both the individual and the parents of the child / children agreed. In borderline cases, these discussions can be held informally and without naming the individual. The school will consider carefully if the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension should not be the default position: a member of staff should be suspended only if there is no reasonable alternative. Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as possible for the reasons for the suspension. The staff member will be provided with a named contact and provided with their contact details to ensure they are supported appropriately. The immediate priority must be to determine whether a pupil(s) has/have suffered or is/are at risk of significant harm and/or in need of protection. If this appears to be the case there should be an immediate referral to local safeguarding agencies. A strategy discussion will be convened in accordance with the statutory guidance 'Working

Together to Safeguard Children'. Additionally, the pupil should be assessed to ascertain if medical treatment is necessary. If a crime may have been committed contact should be made with the police.

Every effort will be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible. 'Settlement agreements' will not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

A note of any action taken and decisions reached whether the outcome was substantiated, unsubstantiated or unfounded will be kept on file. This will include a copy provided to the person concerned, where agreed by children's social care or the police.
There should be a declaration on file regarding whether the information will be referred to in any future reference. Substantiated allegations will be included in references, provided that the information is factual and does not include opinions.

Any investigation by the police or child protection agencies will take priority over an internal disciplinary investigation by the school. Where advice from the LADO suggests that the school should continue to collect evidence this will be done.

Due to restrictions on the reporting or publishing of allegations against teachers every effort will be made to maintain confidentiality and guard against unwanted publicity. Parents or carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing as set out in section 141F of the Education Act 2002.

Low level concerns and allegations
A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child one-to-one in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

To help prevent low-level concerns, staff codes of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and appropriate action will be taken to deal with any concern. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Low level concerns - (Concerns or allegations that do not meet the threshold)
The Governing body should have policies and processes to deal with any concerns (including allegations) which do not meet the harm threshold, referred to as 'low-level' concerns. It is important

that schools have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Early intervention is important and there must be consistent record keeping around low-level concerns.

Low level concerns that are shared about supply staff and contractors should be notified to their employers; and schools should consult with the LADO, if unsure whether low-level concerns shared about a member of staff meets the threshold.

Lessons should be learnt from all cases, not just those that are found to be substantiated.

The Principal should ultimately be informed of all low level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with the DSL.

LOW LEVEL CONCERNS ABOUT ADULTS POLICY

Sharing concerns
Low-level concerns should be reported to the Principal within 24 hours of becoming aware of it. If the Principal is not available then it should be reported to the DSL. If there are concerns about the Principal, these should be reported to the Chair of Governors.

All staff are encouraged to feel confident to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards. The purpose of the policy is to create and embed a culture of openness, trust and transparency. Staff should feel comfortable to discuss matters they are worried may have safeguarding implications, including things they may have seen or heard online.

Recording concerns
The Principal should record all low-level concerns. Records should include the details of the concern, how the concern arose, evidence collected by the DSL where the concern has been raised via a third party, the decision categorising the type of behaviour and the actions taken. The rationale for decision and actions taken should be recorded as well as the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible). Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken. Where such a pattern is identified the school will take action through its disciplinary procedures, or if it meets the harm threshold, refer to the LADO. The school will also give consideration to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Police involvement

In some cases, the police might wish to interview the member of staff against whom the allegation is made before any approach is made by the Principal (or the Chair of Governors in cases where allegations involve the Principal). The police may act independently particularly where the alleged offence does not arise from the individual's professional duties in the school. Police officers should be given every assistance with their enquiries but confidentiality about the enquiries should be maintained in the individual's interests. When the police are involved, it would not normally be expected that police interviews would be undertaken on school premises and it would be expected that appointments are normally made for such interviews to occur at reasonable times.

Notification of interested persons

The police may decide that the investigation would be hindered by an approach to parties at an early stage. Following a strategy discussion, the Principal must ensure there is no objection by the police or

children's social care before contacting any parties. Subject to there being no objection, the Principal (the Chair of Governors in cases involving allegations against the Principal) should:

- inform the child, children or parent making the allegation and explain the likely course of action;
- ensure the parents of the child who is the alleged victim have been informed of the fact of the allegation and of the likely course of action;
- inform the member of staff against whom the allegation is made and explain the likely course of action;
- inform the chair of governors/nominated governor of the school.

Where the police object to the action outlined above, the Principal/nominated governor should be informed accordingly and arrangements made to keep him/her informed as to when these notifications may take place or have taken place. A written record of the action taken under this section should be made by the Principal (or nominated governor).

When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

Where the Principal is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and LADO and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.

Supporting those involved

The member of staff should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling. The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Allegations without foundation

If after investigation the allegation is found to be demonstrably false, then the Principal (or, where the allegation involves the Principal, the Chair of Governors) should:

- take account of the fact that if a child has made an obviously false allegation of abuse, this may well be a strong indicator of problems of abuse elsewhere which require further exploration. The Principal (or the Chair of Governors) will make a referral to external child protection agencies in order that any underlying causes can be ascertained;
- if an allegation is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the pupil who made it;
- inform the member of staff orally and in writing of the allegation and the fact that no further action is to be taken under disciplinary or child protection procedures. The member of staff may be accompanied by a trade union representative or friend;
- consider whether counselling and/or formal professional advice to the member of staff is appropriate and the form either might take;
- inform the parents of the child or children of the allegation and the outcome in writing;
- consider appropriate counselling and support for the child or children who made the allegation(s) and, where appropriate, their parents; in particular, consideration should be given to what follow up action should be taken.
- where the allegation has been made by a person other than the alleged child victim themselves, consideration should be given to informing the parents and child of the fact of the unfounded allegation and providing support as necessary.

Outcome of disciplinary investigation

At the end of the investigation, a meeting should be arranged to inform the member of staff of the next steps. He/she may be accompanied or represented by a trade union representative or friend.

- If the outcome is a disciplinary charge, further action will be in accordance with the school's disciplinary procedures and will happen after child protection enquiries.
- If there has been a substantiated allegation against a member of staff, the school should work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.
- if the individual has been suspended and it is later decided not to proceed with any form of disciplinary action or to dismiss, the suspension should be lifted immediately. The Principal/nominated governors should meet the member of staff to discuss the arrangements for their return to work, (e.g. a phased return to work or the provision of a mentor). Other than in the event of dismissal, the school should provide the opportunity for informal counselling. This could be used to give appropriate guidance, support and reassurance and help, where necessary, to rebuild confidence. There may also be a need for specific guidance and sympathetic consideration may need to be given to other employment options.
- details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

On the conclusion of any investigation and any related disciplinary proceedings, the child or children who made the allegations and their parents should be informed of the outcome of the proceedings. This should be prior to the person's return to school if he or she has been suspended. In some circumstances, consideration should be given to the broader disclosure of details of the outcome, together with reasons, for example, where the issues are of general importance, have become common knowledge or have been the subject of general gossip and there is a need to provide accurate details for public information.

Governors

Governors' responsibilities as trustees of a charity

- Provide a safe and trusted environment which safeguards anyone who comes into contact with the school including beneficiaries, staff and volunteers;
- Set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and properly;
- Have an adequate safeguarding policy, procedures and measures to protect people;
- Provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Commission;
- Avoid exposing the charity's assets, beneficiaries or reputation to undue risk - this means taking reasonable steps to protect beneficiaries, employees and volunteers from harm;
- Be mindful that on occasion, charities may be targeted by people who abuse their position and privileges to gain access to vulnerable people or their records for inappropriate or illegal purposes – governors are alert to this risk and the need to manage it;
- Understand that safeguarding goes beyond preventing physical abuse, and includes protecting people from harm generally, including neglect, emotional abuse, exploitation. In addition to responsibilities as Governors of a school, the Governors understand and comply with their responsibilities as trustees of a charity. They adhere to the Charity Commission's "Strategy for dealing with safeguarding issues in charities" (Updated December 2017) and "Regulatory alert to charities – safeguarding" (December 2017).

Specifically, the Governors will:

- Provide a safe and trusted environment which safeguards anyone who comes into contact with the school including beneficiaries, staff and volunteers;
- Set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and properly;
- Have an adequate safeguarding policy, procedures and measures to protect people;
- Provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Commission;
- Avoid exposing the charity's assets, beneficiaries or reputation to undue risk - this means taking reasonable steps to protect beneficiaries, employees and volunteers from harm;
- Be mindful that on occasion, charities may be targeted by people who abuse their position and privileges to gain access to vulnerable people or their records for inappropriate or illegal purposes – governors are alert to this risk and the need to manage it;
- Understand that safeguarding goes beyond preventing physical abuse, and includes protecting people from harm generally, including neglect, emotional abuse, exploitation, radicalisation, and the consequences of the misuse of personal data;
- Satisfy themselves that there are clear lines of responsibility and accountability for safeguarding, in particular when working with other organisations to deliver services to the school's beneficiaries. Governors will satisfy themselves that any partner organisation, or organisation that uses the school's facilities, has in place adequate safeguarding arrangements, including appropriate policies and mechanisms to provide assurance on compliance;
- Undertake a thorough annual review of the school's safeguarding performance and management arrangements;
- Contact the Charity Commission about serious safeguarding incidents, complaints or allegations.
- Governing bodies and proprietors should be aware of their obligations under:
- The Human Rights Act 1998 Human Rights Act 1998 - Legislation.gov.uk
- The Equality Act 2010 Equality Act 2010 - Legislation.gov.uk

Under The Human Rights Act, it is unlawful for schools to act in a way that is incompatible with the Convention.
Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Under The Equality Act, schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of **safeguarding**, this guidance and the legal duties placed on schools in relation to safeguarding and promoting the welfare of children, the governing body should carefully consider how they are supporting the pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.
Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people. A school could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment

Governors should also be aware of the school's local multi-agency safeguarding arrangements.

Governors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but 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.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt, the school should seek independent legal advice.

Further details on information sharing can be found: in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.
Data protection in schools - Guidance - GOV.UK

Governor training

The Governing body should ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction.

This training will equip governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. The governors' training should be regularly updated.
It is crucial that governors have a sound understanding of safeguarding so that they can support and challenge leadership effectively and with confidence.
Feedback from the governor responsible for safeguarding through the Education Committee and Governors' meetings is essential. Scrutiny of the DSL's termly report to governors also plays a key part in the ongoing awareness and education of governors on safeguarding.

Training and Teaching Resources - Useful links

The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence.

Rape Crisis England & Wales

The Survivors Trust

Childline provides free and confidential advice for children and young people.

Childline

Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Childline's new tool helps young people remove nude ... - NSPCC

County lines and criminal exploitation toolkit - The Children's Society

undressed lgfl **-** A website that features a video and song that schools can use to teach young children about the risk of being tricked into getting undressed online.

FRANK: Honest information about drugs **-** Talk to Frank website

Mental health and behaviour in schools - GOV.UK - - DfE advice

Childnet — Online safety for young people - provide guidance for schools on cyberbullying
Online Safety Resources from CEOP Education
Forced marriage resource pack - GOV.UK

Acronyms
The following acronyms are used throughout this document:

- CCE Child Criminal Exploitation
- CSE Child Sexual Exploitation
- DSL Designated Safeguarding Lead
- DDSL Deputy Designated Safeguarding Lead
- DBS Disclosure and Barring Service
- PSHE Personal Social and Health Education
- DfE Department for Education
- Prevent (not an acronym) Prevent Duty is the duty in the Counter terrorism and Security Act 2015
- KCSIE Keeping Children Safe in Education
- TRA Teaching Regulation Agency
- SCR Single Central Record
- Ofsted Office for standards in Education
- OSSP Oldham Strategic Safeguarding Partnership (formerly LSCB)
- SCRev Serious case reviews
- WRAP Workshop to Raise Awareness of Prevent
- CPD Continuing Professional Development
- MASH Multi Agency Safeguarding Hub - replaced in Oldham by “Duty and Advice”
- SEND Special Educational Needs and Disability
- FGM Female Genital Mutilation
- ICT Information and Communication Technology
- NSPCC National Society for the Prevention of Cruelty to Children
- UKCCIS UK Council for Child Internet Safety
- LADO Local Authority Designated Officer
- HBV Honour Based violence
- HSB Harmful Sexual Behaviour
- GDPR General Data Protection Regulation
- CEOP The Child Exploitation and Online Protection Centre

This policy is available to parents on request and is published on the school website.

Safeguarding Annual Review by Safeguarding Governor Mr Jack Williams **Date : June 2026**

Safeguarding Policy Reviewed: August 2026

Next Review Due: August 2027

Addendum:

Risk Assessments

Risk assessments are required to be undertaken before any activity or task with significant potential risk is carried out for the first time.

Risk assessments will take into account:

Hazard – something with the potential to cause harm

Risk – an evaluation of the likelihood of the hazard causing harm

Control measures – physical measures and procedures put in place to mitigate the risk

The risk assessment should take into account:

· What could go wrong?

· How likely is it to go wrong?

· Who might be harmed?

· How serious would it be if it did?

· What are you going to do to stop it?

· How are you going to check that your plans are working?

Risk assessments will be reviewed on an annual basis or after an incident requiring an urgent review.

Guidance on risk assessments

A pupil welfare risk assessment is a careful examination of what could cause harm to pupil welfare and to consider appropriate control measures.

The purpose of a risk assessment is to identify sensible measures to control real risks - those that are most likely to occur and / or will cause the most harm if they do. When thinking about your risk assessment in this context, remember:

· a welfare issue is anything that may harm a pupil, to include cyber-bullying or abuse

· the risk is the chance that a pupil could be harmed, together with an indication of how serious the harm could be if it occurs.

Step 1: Identify the issue

First you need to work out how pupils could be harmed. This will generally be set out in the concern raised about a pupil's welfare.

Step 2: Decide who might be harmed and how.

Identify individual pupils or groups of pupils who might be harmed and how they might be harmed by the concern raised.

Step 3: Evaluate the risks and decide on precautions.

Decide what to do about the risks. Compare what you currently do with what is required by law and accepted good practice. If there is a difference, list what needs to be done to protect the pupil's welfare. Where appropriate take into account any special requirements or protected characteristics.

Step 4: Record your findings and implement them and make a written record of your significant findings.

The concern, the issues, how pupil(s) might be harmed and what arrangements the School has in place to control those risks.

Step 5: Review your risk assessment and update.