

# EFA Trust Safeguarding and Child Protection Policy

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Essa Foundation Academies Trust

Date of Issue: September 2023

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## Policy Cover Note

Title of the Policy	EFAT Safeguarding and Child Protection Policy
Summary/Reason for bringing to Bord for Approval	Adapted from the LA new model policy
Statutory Requirement	Yes
Decisions to be made / recommendation on options	
Name of the author	Stacey O'Connor
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Date for Review	September 2024
Policy/Procedure to be published on the trust website	Yes
Policy/procedure to be published on the Academy/Primary website	Yes
Amendments/Updates	As the LA policy template changes every year, we have adapted the policy in line with Bolton local authority.

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**Version:** 4

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**Updates and amendments made from the Safeguarding and Child Protection Policy 2022-23**

Section	Summary of change
All	General changes such as reference to KCSiE 22 is now 2023 throughout.
All	Changed LAC to CLA
All	General rewording and moving of sentences to fit better.
Table of people	Moved to front page to ensure this is immediately clear
What staff need to know	Added an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
Resolving differences and Escalation Process	Section added
Record keeping	Files changed to records. Child Protection records will be retained by the child’s last setting until they reach their 25 <sup>th</sup> birthday.
Voice of the child	Added Daily Lived experience

Early Help	<p>Sentence amended to- <i>Where Early Help is no longer effective and concerns are escalating a consultation with the Early Help Access point will take place to determine if a referral to Targeted Early Help Services is required.</i></p> <p>General rewording</p>
Domestic Abuse	Link added to Fortalice and Endeavour
Child on Child	<p>Rewording and changes</p> <p>NSPCC link removed</p>
Sexually harmful behaviour and Harassment	<p>Bullet points added.</p> <p>More detail on keeping students separate.</p> <p>Perpetrator wording changed to “those accused” to be more child appropriate.</p> <p>Added that Bail conditions will be established and adhered to.</p>
Online safety	<p>General re-wording</p> <p>Added Filtering and Monitoring Standards and Cyber Security Standards</p> <p>Added that filtering and monitoring is reviewed annually.</p> <p>Link changed for UK Council for child internet safety</p> <p>Added that during any contact, interventions, and assessment that online risks will be considered.</p>
Serious Violent Crime	Added that more information can be found in the behaviour policy about searches.
Contextual Safeguarding	Complex safeguarding hub section moved.
Radicalisation and Prevent Duty	<p>Removed Liam Twigg and Wendy Robinson due to no longer being in post.</p> <p>Added- Bolton council community safety team.</p> <p>Changed wording from vulnerable to susceptible.</p>
Attendance and children missing education	Section updated with new information and links.
Late/non collection of a child	Paragraph added
The Voice of the child	Added daily lived experience
Arrangements for coming on to our premises	Detail added regarding requirements and checks.
Honour Based Abuse	Link changed to government guidance to reflects change in law from February 2023
Special Educational needs and Disabilities	Links added
Exploitation	Link added to new multi-agency practice principles for exploitation and extra-familial harm
Court system	Section removed
Appendix 2 parents’ version of the policy	Prevention bullet point added that we will provide parents/carers with information to help them to keep their child safe out of school.
Appendix 3- Role of DSL	Added that the DSL now leads on understanding the filtering and monitoring systems and processes in place
Appendix 11 first steps	LADO Mobile number added
Appendix 12 staff allegations record form	Added to record rationale for decision making.

	Added about referral being made to the Disclosure and Barring Service (DBS) if the person has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
Appendix 13 Guide to making a referral	Changed link from GM challenge and escalation procedures to Boltons new procedures.

## **Principles for Child Protection and Safeguarding Children**

### **PURPOSE AND PRINCIPLES**

At EFA Trust we strive to ensure that all students remain safe and free from harm, and we are committed to playing a full and active part in the multi-Agency response to Child Protection concerns. We recognise that we are an important part of the wider safeguarding system for children and young people. The purpose of this document is to ensure that all our staff are aware of the arrangements that we have in place for safeguarding and promoting the welfare and safety of our students. It provides guidance to help staff who may have concerns about the safety or welfare of a child or young person and sets out our position in relation to all aspects of the Safeguarding and Child Protection process.

### **SCOPE**

This Policy reflects current statutory guidance:

[Education Act 2002](#): Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are students at the school.

[Working Together to Safeguard Children 2018](#) sets out organisational responsibilities for schools and colleges and this applies to maintained, independent, academies, free schools and alternative non provision academies.

[Keeping Children Safe in Education 2023](#): Statutory guidance for schools and colleges was issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. This contains information on what schools and colleges **should** do and sets out the legal duties with which they **must** comply.

This policy and its procedures do not form part of the contract of employment; however, they apply to all full and part time employees, including those employed on temporary or fixed-term contracts. Volunteers, supply staff and contractors who offer their services. A shortened version is available for staff (see appendix 1) and parents/carers (see appendix 2). All staff are asked to sign to say they have read and understood the policy (see appendix 18).

The Integrated Front Door refers to Bolton’s Children Social Care and Early Help Team.

This Policy is publicly available on our website and will be reviewed annually. It will be amended as required; this may be before the annual review date.

### **KEY DEFINITIONS AND CONCEPTS**

The Children Act 1989 and 2004, states a child is anyone who has not reached their 18<sup>th</sup> birthday. The commitment to safeguarding and promoting the welfare of children however will extend to all children and young people who visit EFA Trust as well as our own students.

### **EQUALITY AND DIVERSITY**

We understand that promoting equality and diversity and tackling discrimination is essential in safeguarding our students. We hold separate policies and procedures in place to address issues such as behaviour, PSHE, anti-bullying policy, code of conduct that covers harassment and discrimination. We are committed to the Protected Characteristics under the Equality Act 2010:

- We will not unlawfully discriminate against students with protected characteristics.
- We will consider how to support students with protected characteristics.
- We will take positive action, where proportionate, to deal with the disadvantages these students face.

The Equality Act 2010 can be accessed [here](#).

## **SAFEGUARDING AND PROMOTING WELFARE**

No single professional can have a full picture of a child or young person's needs and circumstances. If children, young people and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. To fulfil this responsibility effectively, all staff will make sure their approach is child centred. This means that they will always consider what is in the **best interests** of the child. We recognise that Student's at alternative provision and those missing education are potentially at greater risk of harm.

The Department for Education (DfE) 'Keeping Children Safe in Education' (September 2023), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

We have statutory policies in place that link to safeguarding and promoting the welfare of our students and these include: First Aid, Health and Safety, Equality, Data Protection, Capability of staff, Complaints, Attendance, Exclusions, Managing Allegations, Safe Recruitment, Premises management, Special Education Needs (SEN), Children Looked After (CLA), Behaviour, Staff discipline, Conduct and grievance, Children with health needs who cannot attend school, Designated teacher for looked-after and previously looked-after children, Sex and relationships education and Medical conditions. Details of these are contained in standalone policies and can be requested or accessed via our website. We also refer to a number of additional safeguarding guidance documents which the DfE issue.

### **Child Protection**

The welfare of our students is paramount. They have an absolute right to a childhood free from abuse, neglect, or exploitation.

Child Protection is part of safeguarding and promoting the welfare of children and refers to the activity that is undertaken to protect children who are suffering or are at risk of suffering significant harm.

### **Significant Harm**

"Harm" is the "ill treatment or the impairment of the health or development of the child" (Section 31, [Children Act 1989](#)); Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child".

Although there are no absolute criteria for determining whether harm is "significant", Bolton Local Authority social care, police, education and health agencies work with family members to assess the child, and a decision is made based on their professional judgement using gathered evidence.

## **OUR ROLE**

- The Designated Safeguarding Lead (and deputies) have a number of responsibilities (See Appendix 3)
- All staff have a responsibility to provide a safe environment in which children and young people can learn.
- Everyone who comes into contact with children, young people and their families have a role to play in safeguarding. Staff are particularly important as they are in a position to identify concerns early and provide help for children and young people to prevent concerns from escalating.



- All members of staff have a responsibility to be mindful of issues related to children and young people's safety and welfare and a **duty to report and refer** any concerns however "minor" they appear to be. (NB It is NOT, however the role of our staff to investigate those concerns).
- We work in partnership with parents and parents have a right to be informed in respect of any concerns about their child's welfare, or any action taken to safeguard and promote the child's welfare, providing this does not compromise the child's safety.
- Children are best protected when professionals work effectively together and share responsibility for protective action.
- Where there are possible concerns about a child's safety, unconditional confidentiality cannot be guaranteed and should not be offered. When a child is subject to Child Protection Plan, information about the child and their circumstances will only be shared on a "need to know" basis.
- To have in place robust systems that deter possible abusers and will effectively manage any allegations or concerns about abuse if they arise. The staff member who has a concern about a child's welfare should follow the referral processes set below.
- To support social workers and other agencies following any referral.
- When children make allegations about abuse or neglect, they will always be listened to, have their comments taken seriously and, where appropriate, the allegations will be investigated thoroughly by a social worker and the police.
- All staff are prepared to identify children who may benefit from early help. Staff may be required to support other agencies and professionals in early help processes.
- [The Teachers' Standards 2011](#) state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### **Record keeping**

Records are kept updated and stored securely. Records should only be accessed by those who need to and when file content is shared, this is done in line with Information Sharing [Guidance](#).

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on CPOMs. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy) and read guidance in appendix 4.

The Designated Safeguarding Lead has oversight of record keeping and is responsible for keeping clear chronologies (see appendix 9) picking up any patterns and themes.

The Designated Safeguarding Lead is responsible for transferring Child Protection files to the new school or college within five days of an in-year transfer or within the first five days of term. They should be transferred separately from the main file and a receipt should be obtained. The Transferring of Safeguarding Information form (appendix 10) can be used as a check list and as receipt.

Child Protection records will be retained by the child's last setting until they reach their 25<sup>th</sup> birthday.

### **What staff need to know:**

**All** staff are aware of our systems that support safeguarding, and these are explained to them as part of staff induction and staff are provided with this policy along with the following:

- Part one of Keeping Children Safe in Education (2023) or a condensed part one where we think it is more appropriate for our staff not working directly with children.
- the staff behaviour policy (sometimes called a code of conduct).
- The identity of the Designated Safeguarding Lead and deputies.
- Face-to-face safeguarding training as well as online safeguarding training courses

**All** our staff receive appropriate safeguarding and child protection training at induction along with online safety training and information including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This is regularly updated. In addition, all staff receive safeguarding and child protection updates (for example, via email, newsletters, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

**All** our staff are aware of the early help process and understand their role in it. This includes identifying emerging concerns, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases acting as the lead professional.

**All** our staff are aware of the process for making referrals to children's social care (see flowchart- appendix 14).

**All** our staff know what to do if a child tells them he/she is being abused or neglected. Staff know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the Designated Safeguarding Lead and children's social care. Staff will not promise that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

**All** our staff are advised to maintain an attitude of '**it could happen here**'. When concerned about the welfare of a child, staff members will always act in the best interests of the child.

If a child or young person is in **immediate danger or is at risk of harm** either during working hours, outside of these hours or during an out of school/college activity a referral will be made to The Integrated Front Door or the out of hours team immediately. To avoid any delay, anybody can make a referral, however our DSL should always be notified. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child.

### **Responding to a disclosure**

It is recognised that a student may seek out an individual teacher/adult to share information specifically about abuse or neglect, or they may talk spontaneously, individually or in a group when staff or volunteers are present.

In these situations, our staff are required to:

- Provide a safe space for all students including LGBTQ+ and for them to speak out or share concerns with a member of staff.
- Listen to the student and allow them to freely recall significant events without asking leading questions.
- Reassure the student but tell them that a record of the information given will be made. Record the information, include date, time and others present. Record the student's demeanour as well as what is said.
- Explain that confidentiality cannot be promised if the matter is related to child protection or abuse.
- Explain that help may be required to keep them safe, but do not ask the student to repeat their account of events to anyone else until further advice is sought.
- Recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so they may not be able to recall all details or timeline of abuse.
- Keep in mind that certain students may face additional barriers to telling someone because of their disability, gender, ethnicity and/or sexual orientation.
- Reflect back, using the child's language, when hearing a report.

The individual who receives the information will be expected to pass it on as a matter of urgency to the Designated Safeguarding Lead (see Appendix 4) to record the information.

We recognise that students may not feel ready or know how to tell someone they are being abused, neglected, or exploited and/or may not recognise that their experiences are harmful. This will not prevent our staff from having professional curiosity and speaking to the DSL if they have concerns about a child. Staff will determine how best to build trusted relationships with children and young people to facilitate effective communication.

## **Procedures and Guidelines for Child Protection and Safeguarding Children**

### **PREVENTION**

We take seriously our duty of care, and we are proactive in seeking to prevent children becoming the victims of abuse, neglect, or exploitation. We do this in several ways:

- Through the creation of an open culture which respects all individuals' rights and tackles bullying and discrimination of all kinds.

- By identifying members of staff who have overall responsibility for Child Protection matters .
- By promoting British values and offering Personal, Social, Health and Economic education (PSHE) curriculum to address the issue of child protection in the wider context of safeguarding. Link available to PSHE guidance [here](#).
- By ensuring our Designated Safeguarding Lead receives training and acts as a source of advice and support to other staff.
- By informing students of their rights to be free from harm and encouraging them to talk to staff if they have any concerns.

## EARLY HELP

Early Help means providing support as soon as a need emerges, at any point in a child or young person’s life.

In Bolton we refer to Bolton’s [Framework for action](#) which provides guidance on how Early Help will facilitate high quality, collaborative working that is holistic and supportive. For Early Help to be effective, we work closely with families and partner agencies to:

- Identify children, young people and families who would benefit from support.
- Undertake an assessment of need.
- Provide services to address those needs.
- Review progress to ensure that positive change has happened.

Factors which may indicate a student may benefit from Early Help (not exhaustive)		
Misusing drugs or alcohol	Young carers	Going missing from home
Family circumstances such as parental drug, alcohol, mental health and domestic abuse	At risk of modern slavery trafficking or exploitation	Anti-social behaviour, criminality, gangs/Organised Crime Group (OCG)
Mental health needs	Persistent absence from education	Is being privately fostered
At risk or being radicalised or exploited	Suspensions and at risk of permanent exclusion	Returned to family from care or stepped down from social care involvement
A family member in prison or parental offending	Medical conditions or special educational needs	Honour based abuse such as FGM or forced marriage

We are committed to Early Help and the identification of unmet needs and vulnerabilities of our students. Our staff are aware of the Early Help process and understand their role in identifying emerging problems, sharing information with other agencies and for some staff acting as the lead professional in undertaking Early Help Assessments and co-ordinating support. We support the wellbeing of children, young people, and families by tackling emerging needs at the earliest opportunity and prevent them from getting worse.

Where Early Help is no longer effective, and concerns are escalating a consultation with the Early Help Access point will take place to determine if a referral to Targeted Early Help Services is required.

Bolton’s Integrated Front Door has aligned Children’s Social Care and Early Help. Contact details- 01204 331500 Option 1 Early Help access point, Option 2 Social Care, Option 3 Professional Consultation Line.

The Early help Assessment and review form can be found [here](#)

To refer to the Targeted Early Help Team an online referral form can be found [here](#)

With consent all Early Help Assessments, reviews and closures are sent to [boltonisa@bolton.gov.uk](mailto:boltonisa@bolton.gov.uk)

## TYPES OF ABUSE AND NEGLECT

**Abuse:** *a form of maltreatment of a child. Anybody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Types of abuse may overlap.*

**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. More information on Fabricated or Induced Illness can be accessed [here](#).*

**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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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, domestic abuse, bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**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 activity 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.

We are aware of and promote the [Stop abuse together \(campaign.gov.uk\)](https://www.campaign.gov.uk)

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

- Protect a child from physical and emotional harm or danger.
- Provide adequate food, clothing and shelter including exclusion from home.
- Ensure adequate supervision (including the use of inadequate caregivers or children being left unattended or abandoned at home).
- Ensure access to appropriate medical care, treatment, and/or education.
- It may also include neglect of, or unresponsiveness to, a child's basic physical and emotional needs.

We refer to Boltons [Neglect Practice Guidance](#)

## **INDICATORS OF ABUSE AND NEGELCT**

Our staff will look out for any of the following indicators and take the appropriate action. The child may:

- Show unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- Have an injury for which the explanation seems inconsistent.

- Describe what appears to be an abusive act in which they were involved – verbally or in written form such as an essay or drawing.
- Show unexplained changes in behaviour - e.g., becoming very quiet, withdrawn, or displaying sudden outbursts of temper or hysteria. Academic work may suddenly deteriorate.
- Demonstrate age-inappropriate sexual awareness.
- Engage in sexually explicit behaviour.
- Be distrustful of adults.
- Have difficulty in making friends or be prevented from socialising with other children.
- Showing signs of depression, self-injury, suicidal tendencies.
- Not being taken to medical appointments.
- Lose weight for no apparent reason.
- Become increasingly dirty or unkempt, with inadequate or damaged clothing.

The above list is not exhaustive and the presence of one or more of the indicators will not be proof that abuse is taking place. It is **not** the responsibility of members of staff to decide that abuse is occurring, but it is their responsibility to act on any concerns.

### **GUIDANCE FOR SPECIFIC SAFEGUARDING CIRCUMSTANCES**

**All** staff have an awareness of specific safeguarding areas. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and colleges on the TES [website](#) and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk).

We access broad government guidance on a range of safeguarding issues via the GOV.UK [website](#), Bolton Safeguarding Partnership [website](#) and Greater Manchester [Procedures](#).

### **DOMESTIC ABUSE**

Domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have intimate partners or family members regardless of gender or sexuality. The abuse can include, but is not limited to:

\*Psychological \*Physical \*Sexual \*Financial \*Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and young people through seeing, hearing, or experiencing the effects of it within in their home life and/or in their own intimate relationships.

The Domestic Abuse Act came into force in 2021 and support can be found [here](#). Bolton’s Domestic Abuse Handbook will be referred to and can be accessed [here](#)

If we are concerned about domestic abuse, we will take action. This could be contacting support services such as [Endeavour](#), [Fortalice](#), the Police or the Integrated Front Door. An Early Help assessment will be completed in cases with no social care involvement.

### **OPERATION ENCOMPASS**

Encompass is a partnership between the Police, Local Authority and Education. Working together to safeguard children, the Police will inform us about any domestic abuse incident where a child or young person has been present. In the short term this will enable us to take appropriate steps to support students during what could be an emotionally difficult day. In its simplest form, they are given some leeway, comfort, and support. Early Help will also be considered to offer a holistic package of support to families experiencing domestic abuse.

We can gain free advice from an Education Psychologist about how best to offer support. OE Teachers' National Helpline on **0204 513 9990**. Resources are available through encompass on their [website](#). See flow chart appendix 15.

### **CONSENT**

If a young person is under the age of 13 years old, under the Sexual Offences Act 2003 they cannot legally consent to any form of sexual activity. Therefore, a referral to The Integrated Front Door will be made in all such cases. The [Sexual Offences Act 2003](#) reinforces that, whilst mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes from it, the age of consent still remains at 16 years of age. This acknowledges that this group of young people are still vulnerable even when they do not view themselves as such. Whilst a referral to The Integrated Front Door or the police is not mandatory in such cases, careful consideration (including whether the children are Gillick Competent (using [Fraser competent Guidelines](#)) must be given and explore any difference of age, maturity, functioning and experiences and also an awareness of the potential consequences of their act. The Designated Safeguarding Lead will seek guidance from The Safeguarding in Education Team and or the Integrated Front Door in such cases.

## **RELATIONSHIP AND SEX EDUCATION**

It is now [compulsory to teach relationships education](#) in primary schools, and relationships and sex education in secondary schools. This area of work will support our students with a variety of issues that will reduce them being at risk of harm and promote them having better life chances. Our teachers are prepared to handle any safeguarding issues that may arise during these lessons and will report any concerns that are identified to the Designated Safeguarding Lead without delay.

## **CHILD ON CHILD ABUSE**

Staff are aware of the harm caused by bullying and will use our anti-bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or harm.
- Sharing of Nudes and Semi Nudes (also known as youth produced imagery)

Child on Child abuse will never be accepted or dismissed as 'children being children'.

Our PSHE curriculum aims to prevent child on child abuse and opportunities are provided for students to report any concerns. However, should we identify child on child abuse and identify risk of significant harm, we will refer to the Integrated Front Door and the police to make sure that the children and young people affected get the help and protection they need. Should the case not require Social Care intervention Early Help will be offered.

## **SEXUALLY HARMFUL BEHAVIOUR, VIOLENCE AND HARASSMENT**

*Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children and young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment.*

*Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal). Some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.*

## **What is Sexual violence and sexual harassment?**



## Sexual violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so 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.

Whilst not intended to be an exhaustive list, sexually harmful behaviour and harassment can include:

- unwanted sexual comments and messages, including social media, 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 ( we consider if this crosses a line into sexual violence, we will talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment.
- abuse in intimate personal relationships between peers.
- non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- sexual exploitation; coercion and threats

(Also see [consent](#) section)

## Our culture

We have created a culture where sexual harassment and online sexual abuse are not tolerated. We identify issues and intervene early to better protect our students.

- We make clear that sexual violence and sexual harassment is not acceptable.
- We do not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh".
- We challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, sexist language and lifting up skirts.
- We do not rely on students making disclosures, we actively look out for any indicators such as a change in behaviour or emotional wellbeing. We will openly ask outright if they have been harmed or threatened.
- We make clear to our students the ways they can report and who they can go to.
- Students can also report things anonymously using SHARP via our website.
- We are committed to preventing and responding to any sexually harmful behaviours at the earliest opportunity.
- Our PSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, specifically includes sexual harassment and sexual violence, including online. We include time for open discussion of topics that students can tell us they find particularly difficult, such as consent and the sending of 'nudes'.
- We follow guidance within Keeping Children Safe in Education (2023, part 5) and Greater Manchester Procedures [here](#). We utilise the NSPCC Harmful sexual behaviour [framework](#).
- We promote the [Dedicated helpline for victims of abuse in schools | NSPCC](#) and [Stop abuse together \(campaign.gov.uk\)](#)
- We are aware that being subject to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights.

We ensure our staff receive training to ensure that they are able to:

- better understand the definitions of sexual harassment and sexual violence, including online sexual abuse .
- identify early signs of child-on-child sexual abuse.
- consistently uphold standards in their responses to sexual harassment and online sexual abuse.
- Engage students in sensitive conversations.

Our behaviour policy will be followed including sanctions when appropriate, to reinforce a culture where sexual abuse, violence, harassment and online sexual abuse are not tolerated.

### **How we respond to sexual violence or sexual harassment**

- For **all** cases where a child has been harmed, Children's Social Care and the Police will be informed.
- We put measures in place to safeguard children for example the introduction of a safety plan without delay.
- We balance the victims wishes against our duty to protect them and other students. If the referral is against the wishes of the victim, this will be handled extremely sensitively, and the reasons provided to the victim and support offered.
- If Social Care do not become involved, support will be offered through the Early Help process.
- We listen and reassure all victims that they are being taken seriously and that they will be supported and kept safe.
- We will never give the impression that the student is creating a problem by reporting sexual violence or harassment. A victim will never be made to feel ashamed for making a report.
- We listen to the report but do not ask any leading questions nor speak to those accused until advice is sought.
- Where appropriate sanctions are put in place for accused students in line with our behaviour policy.
- The accused student will also be provided with support.
- We signpost victims to [Help after rape and sexual assault - NHS \(www.nhs.uk\)](http://www.nhs.uk) where appropriate.
- We consult with the Safeguarding in Education Team to devise and implement a safety and support plan ensuring victim and those accused are kept a reasonable distance apart on school premises including at before and after-school activities.
- We put measures in place to support all students involved with their emotional wellbeing.
- All incidents will be recorded to ensure our DSL has oversight to identify patterns and intervene early.

\*See flow chart Appendix 16.

With reports of rape and assault by penetration, whilst the facts are being established alongside the Integrated Front Door and the police, those accused will be removed from any classes they share with the victim. We will also carefully consider how best to keep the victim and those accused a reasonable distance apart on our premises and on transport to and from the Academy, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of those accused. For other reports of sexual violence and sexual harassment, the proximity of the victim and those accused regarding shared classes, sharing Academy premises and transport, will be considered immediately. We will gain details of any bail conditions and put measures in place to ensure these are adhered to.

Where appropriate we will seek advice from The Integrated Front Door, Police and the Safeguarding in Education Team on implementing a safety and support plan for those accused and the alleged victim. Sanctions will be put in place where appropriate, and we will also ensure the emotional needs of both students are considered and support is implemented.

### **ONLINE SAFETY**

Our online safety policy explains how we try to keep students safe. Cyber-bullying, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying and behaviour policies.

We recognise that whilst working online it is essential that students are safeguarded from potentially harmful and inappropriate online material. We follow the [DFE Filtering and Monitoring Standards](#) and [Cyber Security Standards](#) . As such, we have robust security in place such as appropriate filters and monitoring systems. This includes both our network and devices. Staff are aware of these systems, can manage them effectively and will escalate any concerns immediately to the DSL. Our systems are reviewed annually. During any contact, interventions, and assessments we will always consider online risks to the student. We ensure that students are taught how to keep safe online, through



teaching and learning opportunities, as part of providing a broad and balanced curriculum. Harmful and inappropriate content is blocked without unreasonably impacting teaching and learning. We involve parents and carers in this learning. We will communicate regularly with parents to reinforce the importance of children being safe online. Parents are informed of the systems we have in place to filter and monitor online use, what we are asking the children to do online, including sites they will be asked to access and who from (if anyone) their child will be interacting with online. If students are learning remotely we refer to government guidance [here](#).

Should we have any concerns we will:

- Refer to the Department of Education guidance on [Teaching on line safety in schools](#) (2019), [Greater Manchester Procedures](#) and [UK Council for child internet safety](#) (UKCCIS).
- Report to [CEOP](#) a law enforcement agency that keeps children and young people safe from sexual exploitation and abuse- [Reporting link](#) or Tel 0800 1111
- We access resources from [UK safer Internet](#) to keep students safe online. We will also encourage our students/parents/carers to anonymously report online child sexual abuse imagery and videos to the safer internet [Hotline](#).
- Report any harmful content to - [www.reportharmfulcontent.com](http://www.reportharmfulcontent.com)

### **Sharing of Nudes and Semi Nudes (also known as youth produced imagery)**

Sharing of nudes and semi nudes refers specifically to sharing nude and semi-nude images and/or videos. We have a stand-alone policy on Sharing of Nudes and Semi Nudes that includes a flowchart. Staff will also refer to the

Government guidance in relation to [Sharing nude and semi nudes: advice for education settings 2020](#)

We also promote the new [Report Remove tool](#) whereby children, young people and adults can report nude images of them that are circulating social media and ensure they are taken down.

### **CONTEXTUAL SAFEGUARDING AND EXTRA- FAMILIAL ABUSE**

*Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighborhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.*

### **Child Criminal Exploitation /county lines**

*Child Criminal Exploitation (CCE) is a geographical widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people 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 when the victim may have been trafficked for the transporting of drugs.*

If we have any concerns regarding exploitation we will refer to guidance provided by the [Home Office](#) and [Greater Manchester procedures](#) along with [Multi agency practice principles for responding to exploitation and extra familial harm](#). We will record the concerns and if we believe the threshold is met for statutory intervention refer to The Integrated Front Door. Should the case not require Social Care intervention Early Help will be offered.

The Designated Safeguarding Lead (and any deputies) is aware of the National Referral Mechanism and will consider if a notification is required through the Integrated Front Door. Like other forms of abuse and exploitation, CCE can:

- affect any child or young person (male or female) under the age of 18 years.
- affect any vulnerable adult over the age of 18 years.
- still be exploitation even if the activity appears consensual.
- involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

### **Child Sexual Exploitation (CSE):**

The definition of Child Sexual Exploitation is as follows:

*Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a*

*in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator(s) or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology (DfE, February 2017).*

Technology is widely used by perpetrators as a method of grooming and coercing victims, often through social networking sites. More information about Child Sexual Exploitation is available on the [Bolton Safeguarding Children Partnership website](#), [Greater Manchester Procedures](#) and staff are also aware of the Department for Education's [Child sexual exploitation: guide for practitioners](#). Online training is also available at [Pace UK](#).

If there are concerns that a student may be being sexually exploited, we will record the concerns and where appropriate refer to The Integrated Front Door. Should the case not require Social Care intervention Early Help will be offered.

If we have concerns that a student is being exploited or they are frequently missing from home, then a referral will be made to The Integrated Front Door. The referral will be triaged and if the risks are considered medium/high then the student will be referred to CEAM (Child Exploitation and Missing) Panel and if deemed appropriate a Complex Safeguarding Social worker will be allocated. We will share appropriate information as requested by CEAM via the Safeguarding Education Team. Information about the Complex safeguarding hub can be found [here](#).

### **Serious Violent Crime**

Our staff are aware of indicators, which may signal that children and young people are at risk from or involved in serious violent crime. They may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant change in wellbeing or signs of assault and unexplained injuries, attention deficit, involvement in drugs and alcohol, changes to income and poverty. Unexplained gifts or new possessions could also indicate that children and young people have been approached by, or are involved with, individuals associated with criminal networks or gangs.

We will ensure that we carry out '**justified, proportionate and reasonable**' searches in our school where appropriate following the guidance on [Searching, Screening and Confiscation](#) available from the DfE. Guidance on gangs and youth violence can be found [here](#).

### **More information can be found in our behaviour policy.**

We will work in partnership with the local Police, Social Care, Early Help and other key partners to identify timely intervention for our students at risk of exploitation and violent crime. We will consult the [NPCC- When to call the police](#) and also share any intelligence with the police using the form below.



Partner Agency  
Intelligence Form.doc

We have a police officer linked to the Academy who is David Heald. He will lead on any incidents with the Police linked to our students.

### **Hazing/Initiation**

*Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.*

Hazing is seen in many different types of social groups, including gangs, sports teams, and school groups. The initiation can range from relatively minor pranks to patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

Our staff are alert to such behaviour and will act in line with our behaviour policy. We will consider if the police and The Integrated Front Door need contacting or if Early help support should be offered.

### **Modern day slavery & Trafficking**

*Modern Slavery is a term used to describe anyone, including children who are exploited for criminal gain. The impact can be devastating for the victims. Modern Slavery comprises slavery, servitude, forced and compulsory labour and human trafficking. More information and the guidance we follow can be found [here](#).*

### **COMMUNITY SAFETY AND LIAISING WITH THE POLICE**

In emergencies we will ring 999. [NPCC- When to call the police](#) supports us to understand when we should consider calling the police and what to expect when we contact the police.

Community safety incidents in the vicinity, like people loitering and unknown adults talking to students, will be reported to the police and a school safe incident report form completed and uploaded to the Extranet.



School Safe Report  
Blank Form.docx

### **HONOUR BASED ABUSE (including Female Genital Mutilation and Forced Marriage)**

*So-called 'honour-based' abuse (HBA) includes crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family and community pressure and can include multiple perpetrators. It is important that we are aware of this dynamic and additional risk factor when deciding what action to take. All forms of so-called Honour based abuse (regardless of the motivation) will be handled and escalated as appropriate.*

If our staff have concerns about HBA they will speak to the Designated Safeguarding Lead (DSL) who will refer to The Integrated Front Door. Should the case not require Social Care intervention Early Help will be offered.

Information on Breast Ironing and Forced Marriage is available below:

[Forced Marriage](#) and [Breast Ironing](#)

### **FEMALE GENITAL MUTILATION (FGM)**

*FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.*

#### **Indicators of risk:**

- Victims are likely to come from a community that is known to practice FGM.
- Any girl born to a woman who has been subjected to FGM.
- Any girl who has a sister who has undergone FGM.
- Girls taken abroad at start of school holidays.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A professional hears reference to FGM in conversation e.g., a child may tell other children about it.

#### **Indicators of FGM:**

- Girl may have difficulty walking, sitting or standing.
- May spend longer in the bathroom or toilet owing to difficulties in urinating.
- Recurrent urinary tract infections or complaints of abdominal pain.
- spend longer periods away from the classroom.
- Young girls refusing to participate in P.E. regularly without a medical note.
- Prolonged absence from school with noticeable behaviour changes on the girl's return

### **FGM Mandatory Reporting Duty**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Teachers **must** report to the police cases where they discover that an act of FGM appears to have been carried out, by telephoning 101.

All staff who are concerned about FGM will speak to the Designated Safeguarding Lead who will contact The Integrated Front Door. See flow chart in Appendix 17

- Online E- Learning training on FGM is available [here](#)
- Multi agency statutory guidance on FGM 2020 can be found [here](#)

## **RADICALISATION**

*Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.*

As with managing other safeguarding risks, our staff are alert to changes in children and young people's behaviour which could indicate that they may be in need of help or protection.

### **Prevent**

*From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism, also known as the Prevent duty. Bodies to which this duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ('Prevent Guidance'). Paragraphs 57-76 of the Prevent Guidance are concerned specifically with schools.*

The School Prevent [Guidance](#) (2015) summarises the requirements in terms of four general themes: **risk assessment, working in partnership, staff training and IT policies**.

We understand the risks affecting children and young people and understand how to identify individual children who may be susceptible to radicalisation and what to do to support them. We will assess the risk of children being drawn into terrorism, including support for extremist ideas such as Right Wing, Far Right, International, Incel, Far Left, and Environmental related influences.

As part of this Duty our Designated Safeguarding Lead will:

- undertake Prevent awareness training and be able to provide advice and support to other members of staff on protecting children and young people from the risk of radicalisation.
- ensure that children and young people are safe from terrorist and extremist material when accessing the internet with us and ensuring that suitable filtering are in place.
- ensure that the Guidance for Schools Duty is fully met as part of a risk assessed approach.
- ensure staff are clear on the definition of Extremism, Radicalisation and Terrorism (KCSIE, 2023 p. 89)

We utilise the 'Educate Against Hate' [website](#) which provides us with information, tools and resources to recognise and address extremism and radicalisation. Training on making Prevent referrals and E- learning will be accessed [here](#). Bolton's [Safeguarding against harmful radicalisation Handbook](#) will be referred to as required.

Support and guidance will be gained from [community.safety.services@bolton.gov.uk](mailto:community.safety.services@bolton.gov.uk) and at Bolton Council here [Safeguarding Against Harmful Radicalisation – Bolton Council](#).

### **Channel**

*Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.*

Channel awareness guidance will be accessed from the home office [here](#) along with The Home Office [Prevent and Channel Fact Sheet](#)

If our staff have any concerns about an individual, a channel referral form will be completed. Support can be provided by the Channel Coordinator Tel: 0161 227 3543 Mobile: 07980968857 or the Counter Terrorism policing on 0161 856 6362. Bolton's Channel Panel referrals go to: [Channel.project@gmp.pnn.police.uk](mailto:Channel.project@gmp.pnn.police.uk) OR [gmchannel@manchester.gov.uk](mailto:gmchannel@manchester.gov.uk)

### **CHILDREN WITH FAMILY MEMBERS IN PRISON**

*Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.*

National Intervention for Children with Parents in Custody ([NICCO](#)) provides information designed to support our staff working with offenders' children, to help mitigate negative consequences for those children and young people. For further information [here](#). We will always consider if an Early Help

### **HOMELESSNESS**

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

*Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Referrals and or discussion with housing will take place as appropriate however this does not, and will not, replace a referral into The Integrated Front Door.*

*The Homelessness Reduction Act 2017 places a legal duty that everyone who is homeless or at risk of homelessness will have access to meaningful help. The duties shift focus to early help and encourage families at risk to seek support as soon as possible, before they are facing a homelessness crisis.*

In most cases we consider homelessness in the context of children and young people who live with their families, and intervention will be on that basis. However, it is recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services should be the lead agency for these young people and the Designated Safeguarding Lead (or a deputy) will ensure appropriate referrals are made based on the circumstances. The Ministry of Housing, Communities and Local Government have published joint statutory [guidance](#) on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

### **MENTAL HEALTH**

**All** staff are aware that mental health difficulties can, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children and young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (known as [ACE's](#)), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that our staff are aware how experiences, can impact on behaviour and education.

We promote positive emotional wellbeing by building resilience, promoting healthy lifestyles, recognising what a healthy relationship is and so on.

### **Children and young people requiring mental health support.**

We recognise that we have an important role to play in supporting the mental health and wellbeing of our students.

We have specific staff who are trained to identify possible mental health difficulties and are aware of support services available. We utilise [GM Procedures](#), signpost to: Bolton's The *Be Kind to My Mind Website* and refer to Bolton's Suicide and Self harm pathway.



Feb 2022 Bolton Self  
Harming behaviour P:

Where a student requires support with their mental health/ emotional wellbeing we will:

- Phone 999 in an emergency and follow the pathway above.

- Contact the student's parent/carer.
- Consider if a referral is required to The Integrated Front Door and/or CAMHS.
- Complete an Early Help assessment and support the student/family by using the Early Help process.
- Consider putting a safety plan in place in order to protect the student and others.
- Access a range of advice and support from specialist mental health services to help us to identify what extra support can be provided.

More information is available at [mental health and behaviour in school's guidance](#) and [Education Recovery Support](#) following the COVID Pandemic. Resources are also available [here](#).

### **Behaviour and safeguarding**

A child that is displaying what we may believe to be 'challenging behaviour' could have suffered from abuse or neglect. The behaviour that is being displayed could be 'distressed behaviour'.

If we have serious concerns about a student's behaviour, we will follow our behaviour policy and will also consider whether a multi-agency assessment such as an early help assessment or statutory assessment that goes beyond the student's educational needs is required (see guidance [Working Together to Safeguard Children](#) )

For further guidance we will refer to DfE Behaviour Guidance (2022) [Behaviour in schools](#).

### **ATTENDANCE AND CHILDREN WHO ARE MISSING EDUCATION**

*Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues.* It is important we respond to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The law requires us to have an admission register and an attendance register. All students must be placed on both registers. We follow LA [Guidance for schools on removing a pupil from the school roll](#).

We complete the web-based form as soon as one of the grounds for deletion has been met and not later than the date on which the pupils' name is deleted from the register - <http://www.bolton.gov.uk/schoolsadminremove>

If child is believed to have left the borough with no forwarding address of travel evidence complete the attached CME 1a form and send it back to [onrollgonemissing@bolton.gov.uk](mailto:onrollgonemissing@bolton.gov.uk). The child remains on role until the BMBC has completed reasonable checks to ascertain the whereabouts under 8 1 (h) regulation 8 of the Education (Pupil Registration) (England) Regulations 2006. (See attached for the 15 grounds) Any other related CME enquires e mail: [childrenmissingeducation@bolton.gov.uk](mailto:childrenmissingeducation@bolton.gov.uk)

For any student who has a child protection plan or is looked after but placed at home is absent, we will contact the Early Intervention Service on the first day of absence before 10:30am on 01204 334220. The Early Intervention Service will then conduct a home visit.

When a student has persistent or severe absence, all avenues of support will be facilitated through the Early Help process, but if severe absence for unauthorised reasons continues, it is likely to constitute neglect. We will be conscious of any potential safeguarding issues in these cases and where these remain, a referral will be made to the Integrated Front Door.

We will also adhere to the DfE Guidance for School Attendance [School attendance: guidance for schools - GOV.UK \(www.gov.uk\)](#)

\*Also see our **Attendance Policy**.

### **LOOKED AFTER CHILDREN**

Under the Children Act (1989), a child is looked after if he or she:

- Is provided with accommodation, for a continuous period of more than 24 hours, [Children Act 1989, Section 20 and 21]
- is subject to a care order [Children Act 1989, Part IV]
- is subject to a placement order.



We will ensure that appropriate staff have the information they need in relation to a student's looked after legal status and support contact arrangements with birth parents or those with parental responsibility. We shall also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

### **The Designated Teacher**

Our Designated Teacher (named on page 4) will work with the local authority to promote the educational achievement of our registered students who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, our Designated Teacher has responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders.

The Designated Teacher chairs and leads on how the Personal Education Plan (PEP) is developed and used to make sure the child's progress towards education targets is monitored.

For further information on the role of the Designated Teacher please see Appendix 13 and the following [link](#).

### **Virtual School Head**

*The Virtual School Head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed out-of-authority. The Virtual School Head should ensure the educational attainment and progress of children looked after by the local authority are monitored and evaluated as if those children attended a single school. The Virtual School Head is also responsible for managing pupil premium plus for looked-after children.*

Our Designated Teacher works with the Virtual School Head to promote the educational achievement of previously looked-after children, including discussing how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's Personal Education Plan (PEPs).

In addition, the Virtual School has a non-statutory responsibility for oversight of attendance, attainment and progress of children with a social worker.

The Local Authority Virtual School Head is Lindsay Nelson- 07385 361924 [Lindsay.Nelson2@bolton.gov.uk](mailto:Lindsay.Nelson2@bolton.gov.uk). More information on the Virtual School can be found [here](#).

### **PRIVATE FOSTERING**

By law our Local Authority must be notified when parents make arrangements for their child to be cared for by friends, neighbours or extended family for more than 28 days. When parents make plans for their child to be cared for like this it is called a Private Fostering Arrangement.

If a member of staff believes a child may be privately fostered, they must inform the Designated Safeguarding Lead, who will contact the Integrated Front Door. [More information can be found here](#).

### **SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

Students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of students. We will ensure that:

- we do not make assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.
- we consider that students with SEN and disabilities may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers do not prevent us from gaining the students views and we will be creative in overcoming any potential difficulties.

We refer to guidance on [Reducing the need for Restraint](#) and restrictive intervention in regards to supporting students with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention. We also signpost families to [Bolton's SEND local Offer](#) and refer to [SEND Code of Practice 0-25yrs](#), and [Supporting Pupils with Medical Conditions](#).

\*See our SEND policy.

## **THE CHILD'S VOICE AND DAILY LIVED EXPERIENCES**

We are proactive and take positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns. We have systems in place to ascertain our students wishes and feelings and understand their daily lived experiences. Where there is a safeguarding concern, we seek the views of the child. All our systems operate with the children's best interests at heart. Tools and resources are available [here](#).

## **WHISTLEBLOWING**

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with our management team. The Designated Safeguarding lead in the first instance.

Our Whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the chair of governors.

Staff can also refer to the NSPCC Whistleblowing Advice Line if:

- They feel we don't have clear safeguarding procedures to follow.
- Their concern won't be dealt with properly or may be covered-up
- They have raised a concern, but it hasn't been acted upon
- They are worried about being treated unfairly.

Staff can call about an incident that happened in the past, is happening now or they believe may happen in the future. Whistleblowing Advice Line Call [0800 028 0285](tel:0800 028 0285) Email website [help@nspcc.org.uk-Whistleblowing Advice Line](mailto:help@nspcc.org.uk-Whistleblowing Advice Line)

## **RESOLVING DIFFERENCES AND ESCALATION PROCESS**

We recognise that effective partnership working is a vital element in ensuring that children are safeguarded, and positive outcomes are achieved. However if we do not agree with a decision that has been made, in order to achieve early resolution we will follow [Bolton's Challenge and Escalation processes](#).

## **MANAGING ALLEGATIONS AGAINST THOSE WHO WORK WITH CHILDREN**

Bolton's "[First steps](#)" flowchart is displayed around our building and will be followed in the event that there is an allegation about a member of staff, supply teacher, volunteer or contractor (appendix 13). Allegations against staff will be reported to the Headteacher. Allegations against the Headteacher will be reported to the Chair of Governors. We will not wait to act if a student is at risk of significant harm, we will immediately contact the Police or [Integrated Front Door](#). We will also contact the Local Authority Designated Officer (LADO) Lisa Kelly – 01204 337474/0782 454 1233 [Lisa.Kelly@bolton.gov.uk](mailto:Lisa.Kelly@bolton.gov.uk) . A tracking form will be used to record all allegations and actions taken (appendix 12).

### **Staff who are the subject of an allegation**

When an allegation is made against a member of our team, set procedures must be followed. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected. Arrangements will also be made to support the member of staff against whom an allegation has been made.

### **Transferable risk**

Where a member of staff or volunteer is involved in an incident outside of work which did not involve children but could have an impact on their suitability to work with children, we will consider what triggered these actions and could a student trigger the same reaction, therefore being put at risk.

### **Low Level concerns**

We promote an open and transparent culture in which all concerns about all adults working in or on behalf of EFA Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.



The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Low level concerns will be reported to the Headteacher/DSL who will record the concern. The Headteacher will always be made aware and make the final decision on how to respond. Consultation will be made with the LADO if it is unclear if it is a low-level concern or the concern meets the harm threshold. Any repeated concerns or allegations which do not meet the harm threshold which have all be found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference. Substantiated safeguarding allegations that meet the harm threshold will be included in references. See Part Four, section two of [KCSiE](#).

More information on managing allegations can be found [here](#).

\*Also see our Staff behaviour, conduct and grievance policies.

### **SAFER RECRUITMENT**

We will prevent people who pose a risk of harm by adhering to statutory responsibilities and checking our staff using the [Disclosure and Barring Service](#). We take proportionate decisions on whether to ask for any checks beyond what is required and ensure volunteers are appropriately supervised. We have written recruitment and selection policies and procedures in place. We utilise information from [The Safer Recruitment Consortium](#) in particular [Guidance for Safer Working Practice](#) for those working in Education settings.

At least one person who conducts an interview has completed safer recruitment training.

\*Also see our safer recruitment policy

### **ARRANGEMENTS FOR INDIVIDUALS COMING ONTO OUR PREMISES**

When services or activities are provided, under the direct supervision or management of our staff, our arrangements for child protection will apply to those services /activity providers.

However, where services or activities are provided separately by another body, we seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with us on these matters where appropriate.

We ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

### **USEFUL TELEPHONE CONTACT NUMBERS**

- Integrated Front door- Targeted Early Help and Children's Social Care: 01204 331500
- Emergency Duty Team – Out of Hours: 01204 337777
- Children's Social Care- Child Protection Unit: 01204 337479
- Lisa Kelly- Local Authority Designated Officer (LADO): 01204 337474/07824541233
- Jo Nicholson - Safeguarding in Education Team: 07917072223/01204 337472
- Natalie France– Safeguarding in Education Team: 07384234744/01204 331314

- Lindsay Nelson- Virtual School Head: 07385 361924
- Shona Green – Bolton Safeguarding Children Partnership Officer: 01204 337964
- Child Missing Education 01204 334036
- Police Public Protection Investigation Unit (Child protection): 0161 8567949

## APPENDIX 1

### Summary of the Child Protection and Safeguarding Children Policy. These procedures are for Teaching, Non-Teaching, Contractors, Supply Staff and Volunteers

The summary of this policy and procedures is shown below and a copy of this, including the categories of Abuse (from Working Together to Safeguard Children 2018 & Keeping Children Safe in Education September 2023) will be issued to **all** staff both permanent and temporary, and to any volunteers or contractors who work with the children.

**All teaching, non-teaching, volunteers, contractors, and staff engaged or employed by us have a duty to report and refer any concerns they may have to the Designated Safeguarding Lead who has overall responsibility for child protection matters. This is:**

**Definitions/categories of abuse are shown below, you are expected to familiarise yourself with them.**

<p><b>Physical Abuse (intentional act causing physical injury or trauma)</b></p> <ul style="list-style-type: none"> <li>● Physical injury of any form (hitting, biting, burning, shaking)</li> <li>● Giving drugs including alcohol</li> <li>● When a parent or carer fabricates the symptoms of, or deliberately induces illness.</li> </ul>	<p><b>Sexual Abuse</b></p> <ul style="list-style-type: none"> <li>● Penetrative or non-penetrative acts by males or females</li> <li>● Showing of pornographic material</li> <li>● Includes online.</li> </ul>
<p><b>Emotional Abuse</b></p> <ul style="list-style-type: none"> <li>● Persistent lack of affection</li> <li>● Constant threatening behaviour</li> <li>● Constant overprotection</li> <li>● Unrealistic pressure to perform to high expectations.</li> <li>● Exposure to domestic abuse the abuse can encompass but not limited to, psychological, physical, sexual, financial or emotional. Children may see or hear domestic abuse or suffer domestic abuse in their own intimate relationships.</li> </ul>	<p><b>Neglect</b></p> <ul style="list-style-type: none"> <li>● Persistent failure to meet basic needs.</li> <li>● Failure to protect from harm.</li> <li>● Failure to access medical treatment.</li> <li>● Inadequate supervision</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>● Exploitation such as sexual exploitation or Criminal Exploitation including county lines.</li> <li>● Any actions that single out a child for special attention and could therefore be interpreted as 'grooming'.</li> <li>● Staff need to be fully aware of the dangers and risks associated with electronic communications. Consequently, they <b>MUST</b> ensure that they do <b>NOT</b> engage in inappropriate electronic communication of any kind with students.</li> <li>● Radicalisation/Extremism</li> <li>● Female Genital mutilation</li> <li>● Modern day slavery, Breast Ironing and Honour based abuse.</li> <li>● Online Safety</li> </ul>	

**A student may seek out an individual teacher/adult to share information specifically about abuse or neglect, or may talk spontaneously, individually or in a group when staff or volunteers are present. Anyone hearing an allegation from a child that abuse has, or may have, occurred should:**

<p><b>Receive</b></p> <ul style="list-style-type: none"> <li>● What is said</li> <li>● Accept what you are told – you do not need to decide whether or not it is true</li> <li>● Listen without displaying shock or disbelief.</li> </ul>	<p><b>Reassure</b></p> <ul style="list-style-type: none"> <li>● The student</li> <li>● Acknowledge their courage in telling you.</li> <li>● Do not promise confidentiality.</li> <li>● Remind them they are not to blame – avoid criticising those accused.</li> <li>● Do not promise that “everything will be alright now” (it might not be).</li> </ul>
<p><b>React</b></p> <ul style="list-style-type: none"> <li>● Calmly, respond to the student but do not interrogate.</li> <li>● Avoid leading questions but ask open ended ones.</li> <li>● Clarify anything you do not understand.</li> <li>● Explain what you will do next i.e., inform the Designated Safeguarding Lead.</li> </ul>	<p><b>Record</b></p> <ul style="list-style-type: none"> <li>● Make notes as soon as possible – (during the conversation if you can)</li> <li>● Include: Time, Date, Place, and the student’s own words – do NOT assume: Ask “Please tell me what that means”.</li> <li>● Describe observable behaviour.</li> <li>● Do not destroy your original notes – they may be needed later. Upload to electronic system such as CPOMS.</li> </ul>
<p><b>Support</b></p> <ul style="list-style-type: none"> <li>● Consider what support is needed for the student – you may need to give them a lot of your time.</li> <li>● Ensure you are supported – such conversations can be extremely stressful and time consuming.</li> <li>● Talk to your Designated Safeguarding Lead/Headteacher/Line Manager</li> </ul>	

It is important that if the DSL is unavailable, to reduce delay, staff will refer directly to **The Integrated Front Door to ensure the safety, welfare, and protection of the student Telephone - 01204 331500.**

It must be acknowledged that some children may not feel ready or able to disclose abuse. They may not recognise that the abuse or neglect that they are experiencing is harmful. They may be embarrassed or have vulnerabilities, such as disability or language barriers. This will not prevent staff from having professional curiosity and they should always discuss with the DSL if there are concerns about a child.

We aim to support students at the earliest opportunity and will utilise Early Help processes [here](#)

Where there are concerns regarding a staff member, volunteer, or contractor the DSL/Headteacher must be informed immediately.

## APPENDIX 2

### EFA Trust Child Protection and Safeguarding Policy for Parents and Carers

#### Introduction

We strive to ensure that all our students remain safe and free from harm, and we are committed to playing a full and active part in the multi-agency approach to child protection concerns. Additionally, we have a legal duty to safeguard and promote the welfare of children and young people, and to have a child protection policy and procedures in place, which should be shared with you, to address concerns about the safety and protection of children and young people.

Through our day-to-day contact with students, and direct work with families, our staff have a crucial role to play in noticing indicators of possible abuse, neglect, and exploitation. Parents/carers should be aware therefore, that where it appears to a member of staff that a child or young person may have been abused, we are required, as part of the local child protection procedures to report this concern to Children's Social Care (known as the Integrated Front Door) immediately. Therefore, to avoid any misunderstandings, parents/carers of students who sustain accidental injuries such as cuts/bruises/fractures should inform us **without delay** and explain the cause.

<p><b>Principles</b></p> <ul style="list-style-type: none"> <li>● Children and young people have a right to be safe.</li> <li>● Parents/carers have a right to be informed of any concerns.</li> <li>● Children and young people are best protected when we work together with parents/carers.</li> </ul>	<p><b>Partnership</b></p> <ul style="list-style-type: none"> <li>● Please speak to us if you have any concerns.</li> <li>● We will inform parents/carers of any concerns we have and will offer help and support as necessary.</li> <li>● We will seek your permission to share information.</li> <li>● We will involve you and actively encourage you to participate in any meetings regarding your child.</li> <li>● We will consult with other agencies when we have concerns that a child or young person may have been abused, neglected, or exploited.</li> </ul> <p>* (providing this does not compromise safety)</p>
<p><b>Prevention</b></p> <ul style="list-style-type: none"> <li>● We aim to offer help and support at the earliest opportunity as needs emerge (Early Help).</li> <li>● We have a comprehensive PSHE curriculum that teaches our students about keeping safe.</li> <li>● We will take positive action to prevent children and young people from abuse, neglect, and exploitation through the development of an open culture that informs children and young people of their rights and encourages them to speak about any concerns.</li> <li>● We will provide parents/carers with information to help you to keep your child safe out of school.</li> </ul>	<p><b>Responding to Concerns</b></p> <ul style="list-style-type: none"> <li>● We will listen to parents/carers who raise concerns about their child and offer support.</li> <li>● We will refer all allegations or concerns that a student has been, or is likely to be, abused, neglected, or exploited to The Integrated Front Door.</li> <li>● We will put support in place as soon as we are aware of any concerns this may include completing an Early Help Assessment.</li> </ul>

#### Child on Child Abuse

- Physical and emotional abuse of children by other children will not be tolerated and will be dealt with. Parents/carers will be kept informed of actions taken. Concerns regarding abuse will be referred immediately to Children’s Social Care (The Integrated Front Door) and the police.
- Parents/carers or students can report abuse by contacting social care on 01204 335100. Sexual abuse can also be reported through a [Dedicated helpline for victims of abuse in schools | NSPCC](#) and [Stop abuse together \(campaign.gov.uk\)](#)
- We will ensure students are believed and listened to and support is put in place. This may include a safety plan. Sanctions will be put in place where required.

**Emotional health and wellbeing**

- We aim to support any students who experience any difficulties with their emotional health and wellbeing. Please speak to a member of staff for more details and support can be accessed at Be Kind to My Mind [here](#)

**Domestic Abuse**

- As part of Operation Encompass, we receive notifications from the police relating to domestic incidents when children/young people live in the household. The aim is for us to offer advice and support.
- Parents and carers are encouraged to speak to us about domestic abuse.
- Services can be accessed at Fortalice 0800 2000247 and 01204 365677 and Endeavour 01204 394842

**Online Safety**

- Children can be harmed and abused online and therefore we have measures in place to protect them. We also teach students how to keep safe online.
- It is important that Parents/carers have adequate safety measures in place at home, that children receive consistent messages of how to keep safe online and that they are appropriately supervised.

**Child Protection Strategy Meetings and Conferences**

- If circumstances require, a member of our staff will attend strategy meetings and child protection conferences and will share information. This information will be shared with parents/carers beforehand where possible. We will keep confidential child protection records separately from a student’s academic and other records. And these will be transferred to their future school/college.

**Confidentiality**

- Information from any source, including parents, about possible child abuse cannot be kept confidential.
- Information and records about children who are the subject of a Child Protection Plan will be given only to those people who need it and will be kept strictly confidential by them.

If parents have any concerns, they should contact the DSL / DDSL.

Signed: .....

Headteacher..... Date: .....

## APPENDIX 3

### ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL) See Annex C – [KCSIE 2023](#)

The Designated Safeguarding Lead takes **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a **Senior Leader**, and the role of the DSL is outlined in their job description. The DSL is given the additional time, funding, training, resources, and appropriate support they need to carry out the role effectively.

#### Deputy Designated Safeguarding Leads (DDSL)

In addition to the DSL, there is at least one Deputy Designated Safeguarding Lead. Any deputies are trained to the same standard as the DSL and their role is explicit in their job description. The activities of the DSL can be delegated to appropriately trained deputies, however, the ultimate lead responsibility for child protection, as set out above, cannot be delegated and so, remains with the DSL.

#### Availability

During term time the DSL (or a deputy) will always be available (during opening hours) for staff in to discuss any safeguarding concerns. If they are not available in person, they will be available via phone/online. Adequate and appropriate cover arrangements for any out of hours/out of term activities will be arranged by the DSL.

#### Manage referrals.

The DSL will refer (and support staff who refer):

- suspected abuse and neglect to children’s social care (The Integrated Front Door)
- radicalisation concerns to the Channel panel
- cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required
- cases where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) will be consulted.

#### Working with others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the three safeguarding partners (LA, Police and Health);
- liaise with the Headteacher or 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. Further information can be found in the Statutory guidance –PACE Code C 2019 - GOV.UK ([www.gov.uk](http://www.gov.uk))
- as required, liaise with the “case manager” (usually the headteacher/Principal) and the LADO at the local authority for child protection concerns in cases which concern a staff member.
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT staff, and SENCOs or the named person with oversight for SEN) on matters of safety and safeguarding and welfare (including online and digital safety): when deciding if to make a referral, so that children’s needs are considered holistically.
- liaise with mental health services, where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- promote educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children’s attendance, engagement and achievement.

Working with the Headteacher, the Designated Safeguarding Lead takes lead responsibility for:

- ensuring that the school or college knows its cohort of students who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort.
- support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help children who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

## **Raising Awareness**

The DSL will:

- ensure child protection policies are known, understood, and used appropriately. Ensure that our child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly. Work with governing bodies /proprietors regarding this; and ensure the child protection policy is available publicly. Ensure parents are aware of the fact that referrals about suspected abuse or neglect may be made and our role in this.
- link with the safeguarding children partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- raise awareness of the lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing, so that this is understood by senior leaders and staff and reflected in relevant policies (for example, mental health and behaviour).

## **Training, knowledge and skills**

The DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSL also undertakes Prevent awareness training.

A DSLs knowledge and skills will be continuously refreshed via newsletters, meetings, other DSLs, or simply taking time to read and digest safeguarding developments.

The DSL will:

- be alert to the specific needs of children in need, those with special educational needs and young carers.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- understand and support with the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation.
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and be confident they have the capability to support children with SEND to stay safe online.

## **Understanding processes and procedures**

The DSL:

- understands the assessment process for providing early help and statutory services, including the Framework For Action (Bolton's Threshold document) and local authority children's social care referral arrangements (The Integrated Front Door);
- has a working knowledge of how a child protection case conference and a child protection review conference is conducted and be able to attend and contribute to these effectively when required to do so.
- understands the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children.

## **Providing support to staff**

The DSL will:

- ensure each member of staff has access to, and understands, our child protection policy and procedures, especially new and part time staff.
- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## **Information sharing and managing the child protection file.**

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



The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. They ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in [Keeping Children Safe in Education 2023](#).

Where students leave, the DSL will ensure their child protection file is 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. This will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

The DSL will also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving in order to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Holding and sharing information**

The DSL:

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

We utilise the [Data protection toolkit for schools](#). The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Staff have regard to the Department for Education Guidance; *Information Sharing Advice for Safeguarding Practitioners* (2018) [Safeguarding practitioners information sharing advice](#)

### **Understanding the views of children**

The DSL will:

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

### GUIDANCE FOR SAFEGUARDING RECORDS

#### What is a “welfare concern”?

Concerns may arise in one or more of the following areas:

- The student’s behaviour
- The student has a physical injury.
- The student makes a disclosure or allegation.
- The student’s physical presentation
- Information from or observation of behaviour from a parent/carer or any other person

#### What to record

- Date and your details – avoid using initials.
- The incident / event / observation of concern described clearly and concisely.
- Written using straightforward language and fact and opinion are differentiated.
- If recording a disclosure, the student’s own words are recorded and any questions asked are included.
- Physical marks and injuries are recorded on a body map where appropriate (See Appendix 6)
- Any action taken.
- If using an electronic data base such as CPOMS, scan in handwritten notes taken when a student makes a disclosure and body maps when there is a physical mark or injury and make reference to this in the chronology.

#### How to record actions taken in response to staff concerns

When a welfare concern is recorded, it is important that this is checked to ensure sufficient detail has been recorded and has been dated and signed by the staff member who has reported the concern. If a body map has been completed or there are any other documents referred to in the record, ensure these are attached and where appropriate are also dated and signed.

It is important that a record of the action taken in response to every welfare concern is documented. The level of detail of this record will clearly depend on the nature and seriousness of the concern but may include :

- Requests to staff for monitoring specific aspects of the student’s presentation, behaviour, attendance etc.
- Discussions and telephone calls (with colleagues, parents, student, Social Care and other agencies or services), including rationale, actions and outcomes.
- Professional consultations
- Letters sent and received.
- Early Help Assessments and reviews
- Any referrals (both for external and education-based services)





<b>Should a concern or confidential file be commenced*</b>	*If there isn't already one in place:  Yes/No  Why – state reasons:
<b>Signed</b>	
<b>Print Name</b>	
<b>Date</b>	

## APPENDIX 6

### Body Map Guidance

Body maps are available on CPOMs for all staff logging concerns. For visitors completing concerns a body map template can be found on the next page. Body Maps should be used to document and illustrate visible signs of harm and physical injuries. Always use a black pen (never a pencil) and do not use correction fluid or any other eraser. Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

**Any concerns should be reported and recorded without delay to The Integrated Front Door or allocated social worker if already an open case to social care.**

**When you notice an injury, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:**

- Exact site of injury on the body, e.g., upper outer arm/left cheek.
- Size of injury – in appropriate centimetres or inches.
- Approximate shape of injury, e.g., round/square or straight line.
- Colour of injury – if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the student feel hot?
- Does the student feel pain?
- Has the student's body shape changed? Are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

**Ensure First Aid is provided where required and record this.**

A copy of the body map should be kept on the student's file.

**(This must be completed at time of observation)**

Name of Student:

Date of Birth:

.....

.....

Name of Staff:

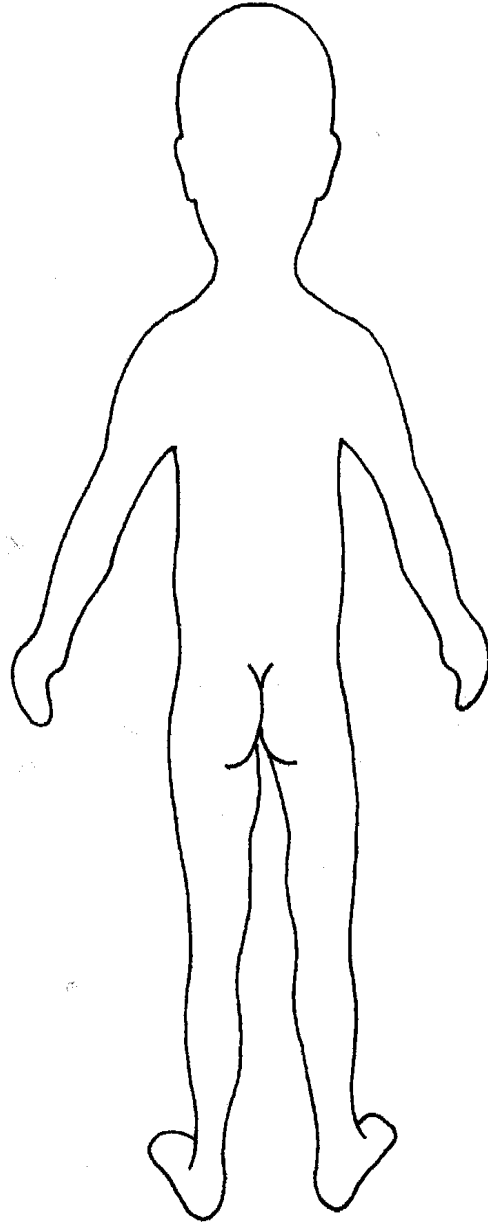
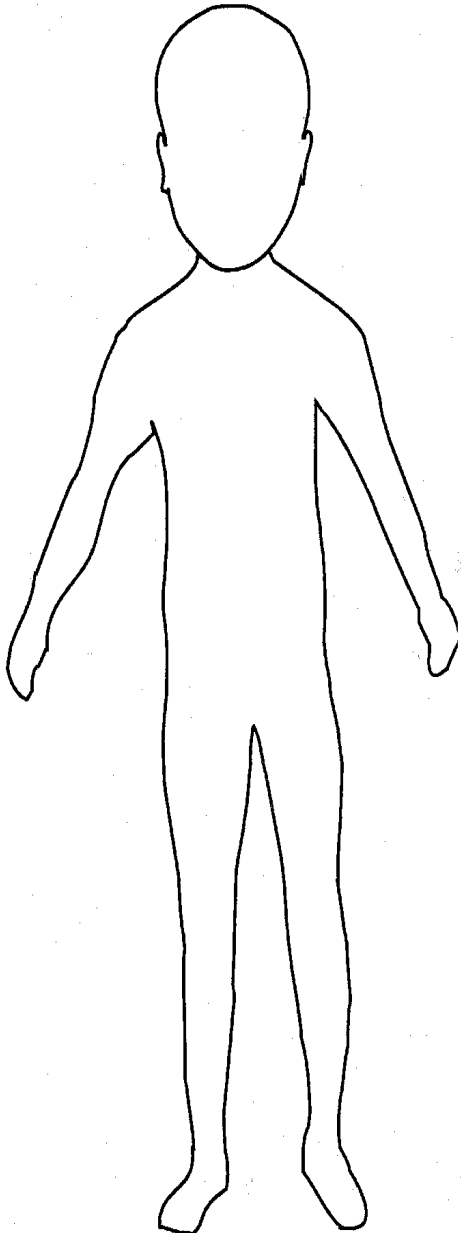
Job title:

.....

.....

Date and time of observation:

.....

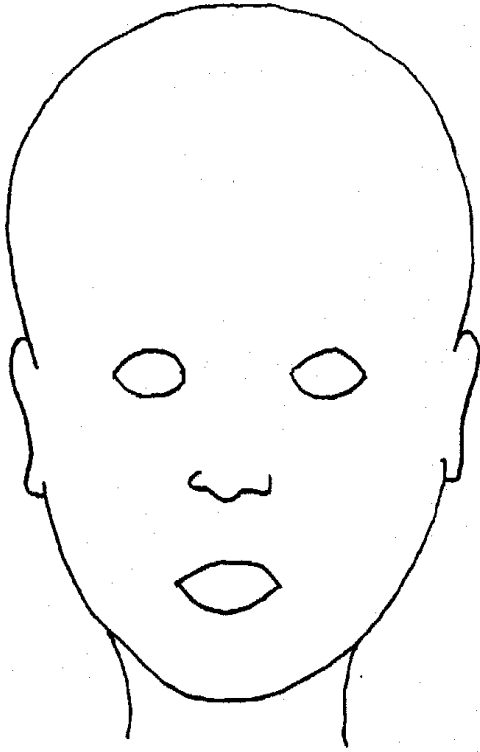


Name of Student:

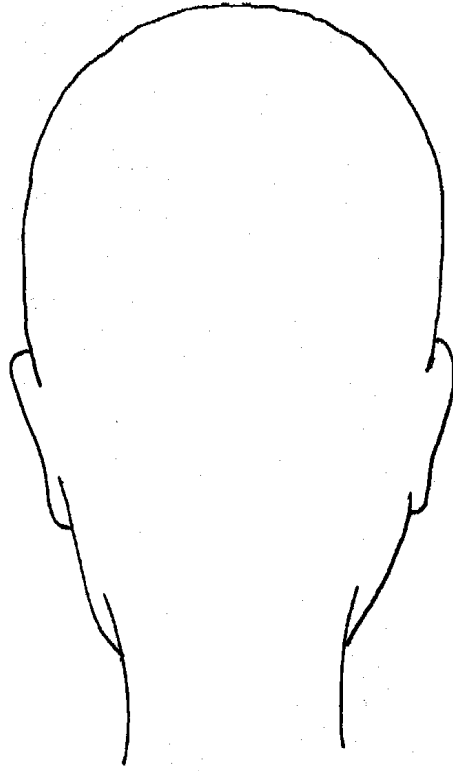
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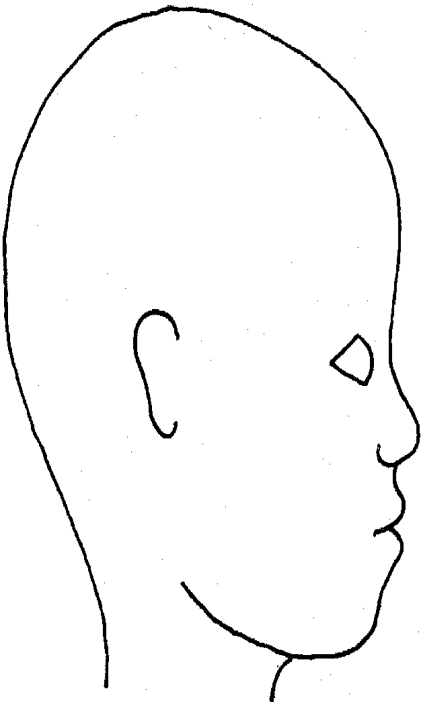
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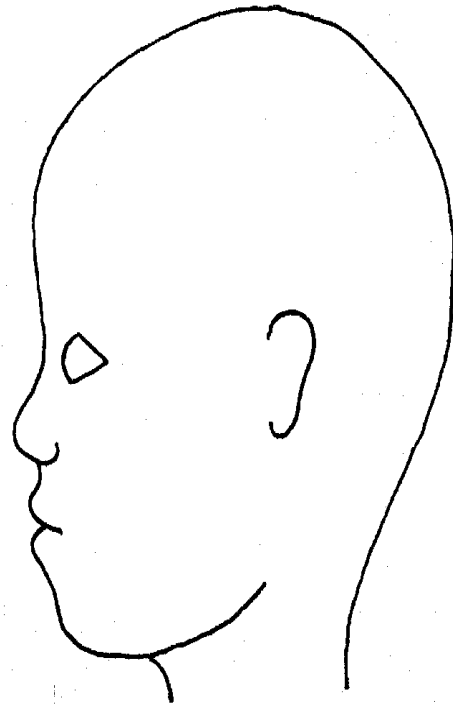
**FRONT**



**BACK**



**RIGHT**

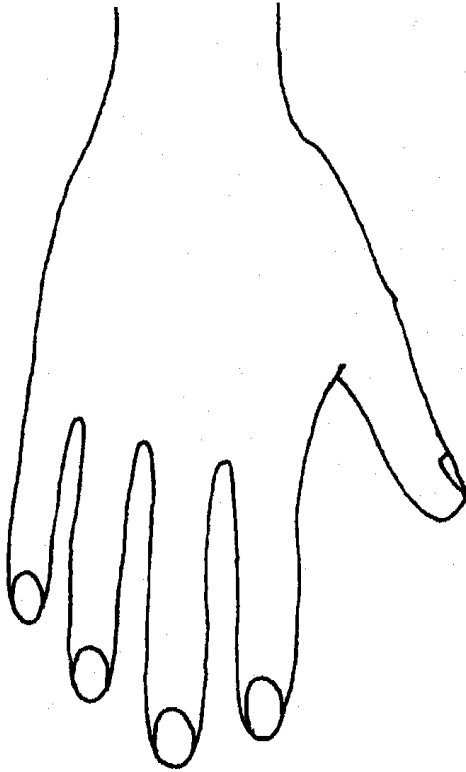


**LEFT**

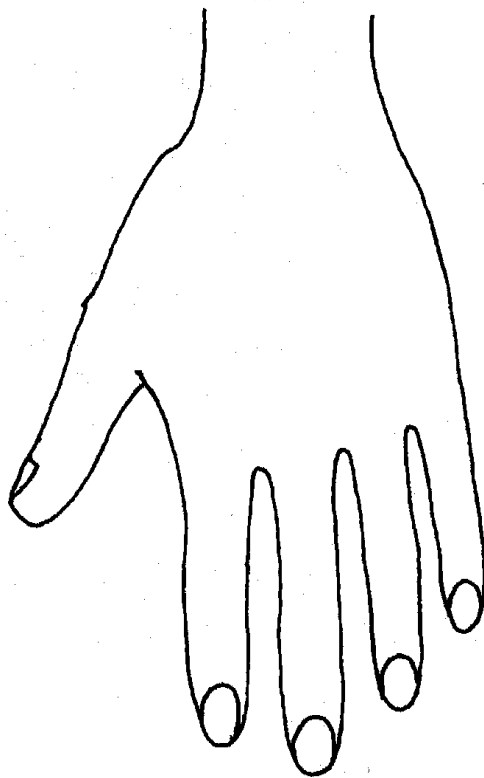


Name of student:

Date and time of observation:

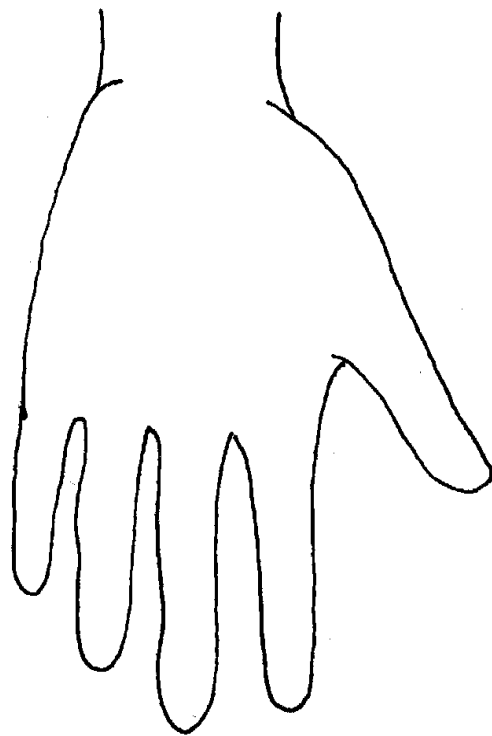


R



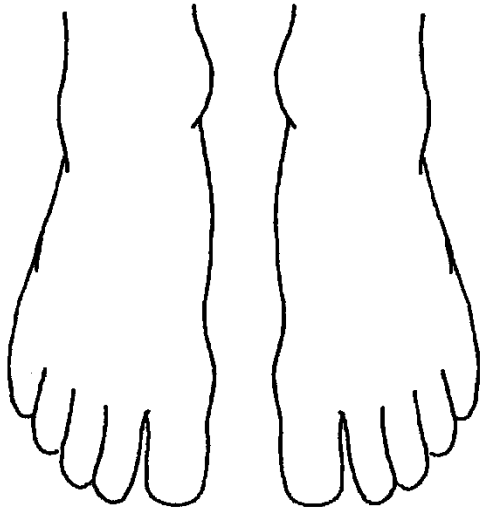
L

**BACK**

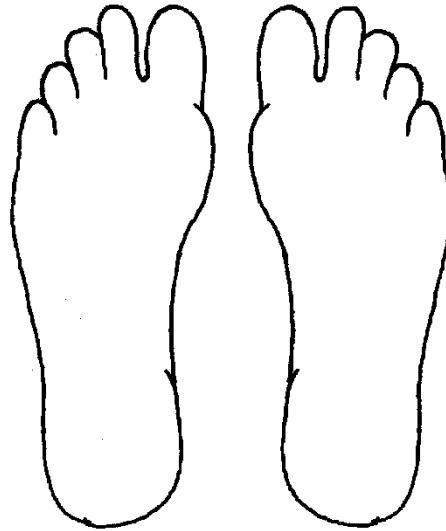


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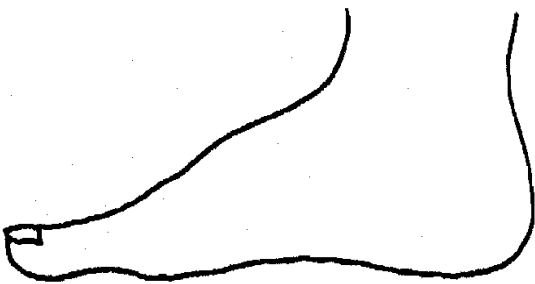
Date and time of  
observation:



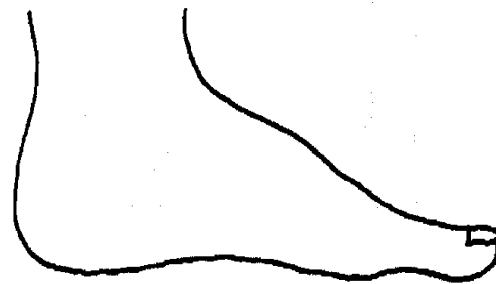
R TOP L



R BOTTO  
M L

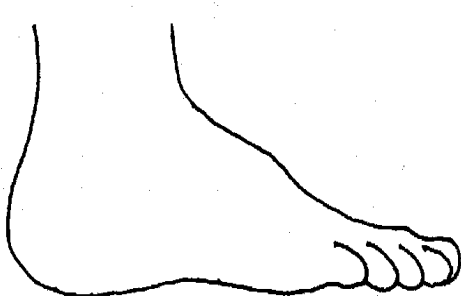


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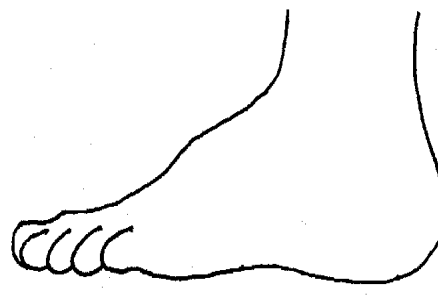


L

INNER



R



L

OUTER

## APPENDIX 7

### TRANSFER OF SAFEGUARDING RECORDS

This form should be completed when a student moves to another setting and there are safeguarding concerns and records to transfer.

**Student's name:**

**DOB:**

**Previous surnames or aliases:**

Name of people with parental responsibilities:

Name of social worker/lead professional:

Information and files transferred (to include chronologies and assessments)

**NB: Parental consent is needed to transfer Early Help Assessments**

**Name of sending school**

**Name of receiving school/college**

**Passed to (name)**

**Date of first entry in file**

**Date of last entry in file**

**Status: (please tick)**

**Single Agency Support (Prevention threshold)**

**Early Help**

**Targeted Early Help**

**Child in Need**

**Child Protection**

**Looked After Child**

**Privately Fostered Child**

**Transferred by:**

**Received by:**

Name:

Name:

Position:

Position:

Signed:

Signed:

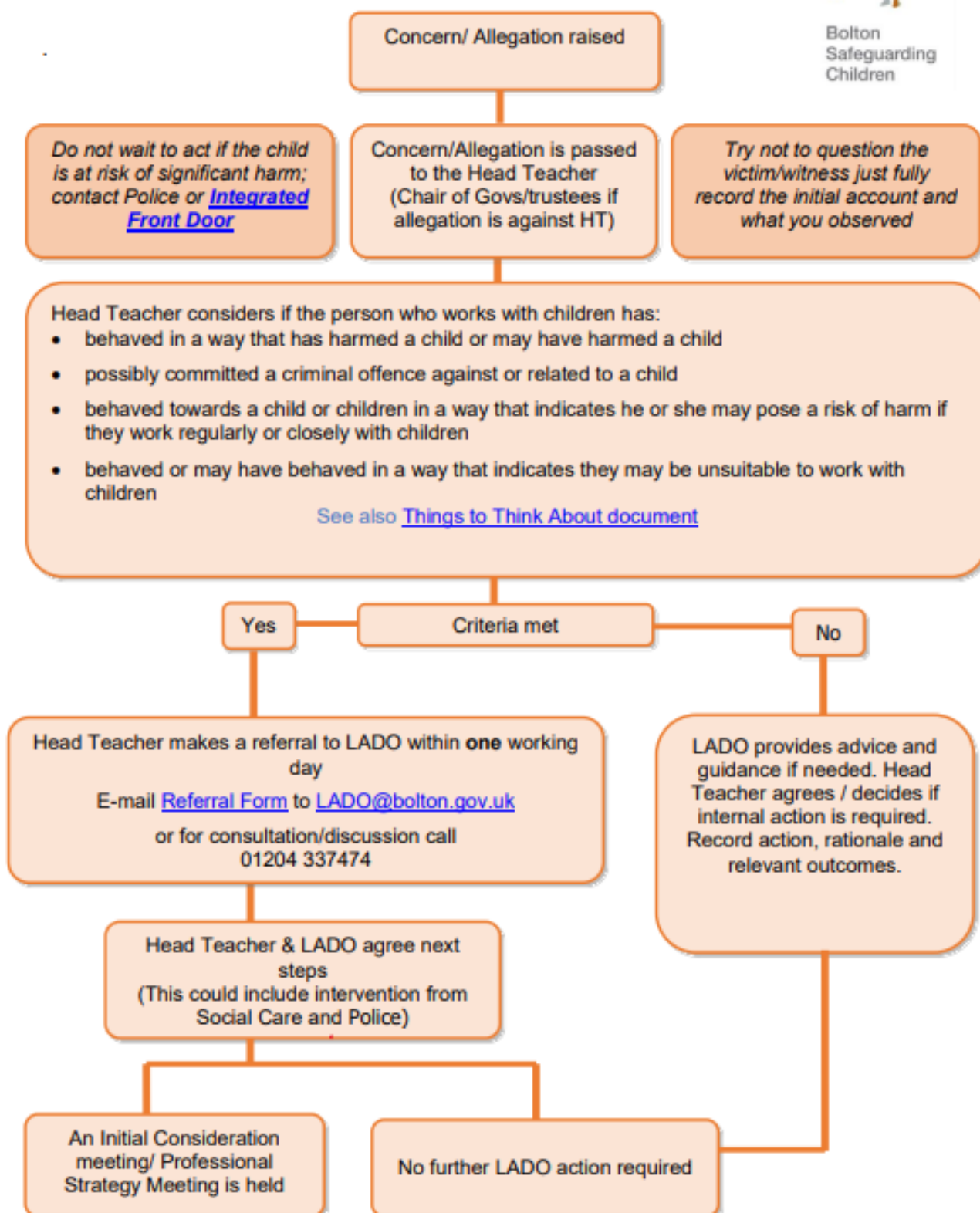
Date:

Date:

## Managing Professional Allegations Local Authority Designated Officer (LADO) 'First Steps' (for schools & colleges)



Bolton  
Safeguarding  
Children



**Bolton LADO - Lisa Kelly**  
01204 337474 [LADO@bolton.gov.uk](mailto:LADO@bolton.gov.uk)  
[LADO Webpage](#)



## APPENDIX 9

### **The Role of the Designated Teacher for Children Looked After (CLA) within the school.**

The Designated Teacher has a leadership role in promoting the educational achievement of every CLA on the school's roll. The role should make a positive difference by promoting a whole school culture where the personalised learning needs of every CLA matters and their personal, emotional and academic needs are prioritised.

### **The Designated Teacher has lead responsibility for helping school staff to understand the things which can affect how CLA learn and achieve. Everyone involved in helping CLA achieve should:**

- Have high expectations of CLA's involvement in learning and educational progress.
- Be aware of the emotional, psychological, and social effects of loss and separation from birth families, the reasons for that separation and that some children may find it difficult to build relationships of trust with adults because of their experiences.
- Understand the reasons which may be behind a CLA's behaviour, and why they may need more support than other children, but the teacher should not allow this to be an excuse for lowering expectations of what a child is capable of achieving.
- Understand how important it is to see CLA as individuals rather than as a homogeneous group and to not publicly treat them differently from their peers.
- Appreciate the importance of showing sensitivity about who else knows about a child's looked after status.
- Create a shared understanding between teachers, carers, social workers and most importantly, depending on age and understanding, the child him or herself of what everyone needs to do to help them to achieve their potential.
- Have the level of understanding of the role of social workers, virtual school head (or equivalent) in local authorities and how education – and the function of the PEP – fits into the wider care planning duties of the authority which looks after the child.

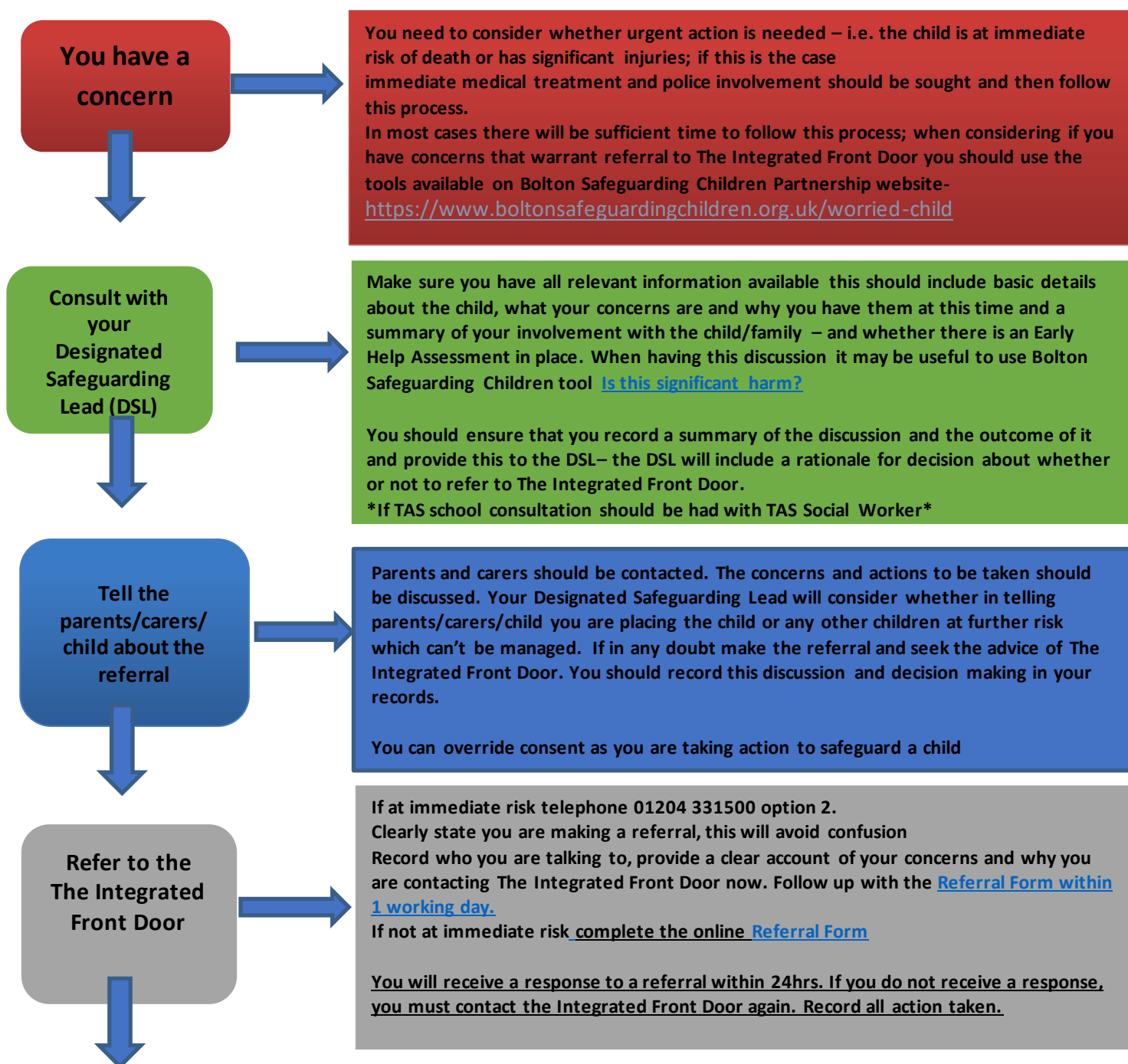
### **In promoting the educational achievement of looked after students the Designated Teacher will:**

- Contribute to the development and review of whole school policies to ensure that they do not unintentionally put CLA at a disadvantage.
- Make sure, in partnership with other staff, that there are effective and well understood school procedures in place to support a CLA's learning. An account should be taken of the child's needs when joining the school and of the importance of promoting an ethos of high expectations about what he or she can achieve.
- Promote a culture in which CLA believe they can succeed and aspire to further and higher education.
- Promote a culture in which CLA are able to discuss their progress and be involved in setting their own targets, have their views taken seriously and are supported to take responsibility for their own learning.
- Be a source of advice for teachers at school about differentiated teaching strategies appropriate for individual students who are looked after.
- Make sure the school makes full use of Assessment for Learning (AfL) approaches to improve the short- and medium-term progress of CLA and help them and their teachers understand where they are in their learning, where they need to go and how to get there.
- Make sure that CLA are prioritised in any selection of students who would benefit from one-to-one tuition and that they have access to academic focused study support.
- Promote good home-school links through contact with the child's carer about how they can support his or her progress by paying attention to effective communication with carers. In particular, they should make sure that carers understand the potential value of one-to-one tuition and are equipped to engage with it at home.
- Have lead responsibility for the development and implementation of the child's PEP within school in partnership with others as necessary.

## APPENDIX 10

### Quick Guide to making a referral

#### PRACTITIONERS QUICK GUIDE TO MAKING A REFERRAL TO THE INTEGRATED FRONT DOOR



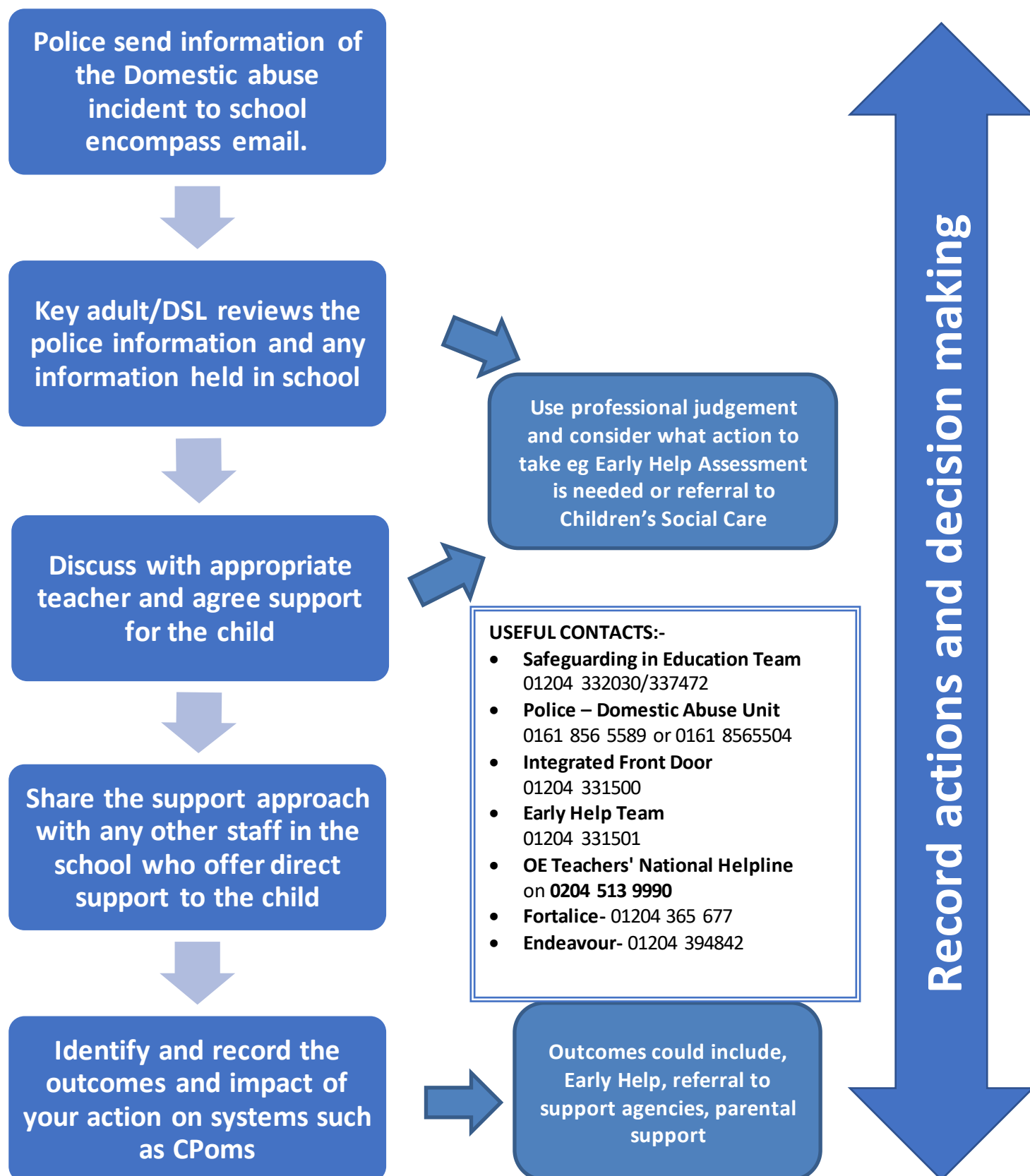
At the end of the call you should know what is going to happen next, the timescales for action – and what your role in this will be. When making a referral refer to [Useful information when making a Child Protection referral](#)

If the Integrated Front Door does not agree that social work involvement is needed you should listen to their reasoning for this and their advice about alternative action – including recommendations to use early help processes; if at the end of this you still do not agree then you should refer to [Bolton's Challenge and Escalation Process](#).

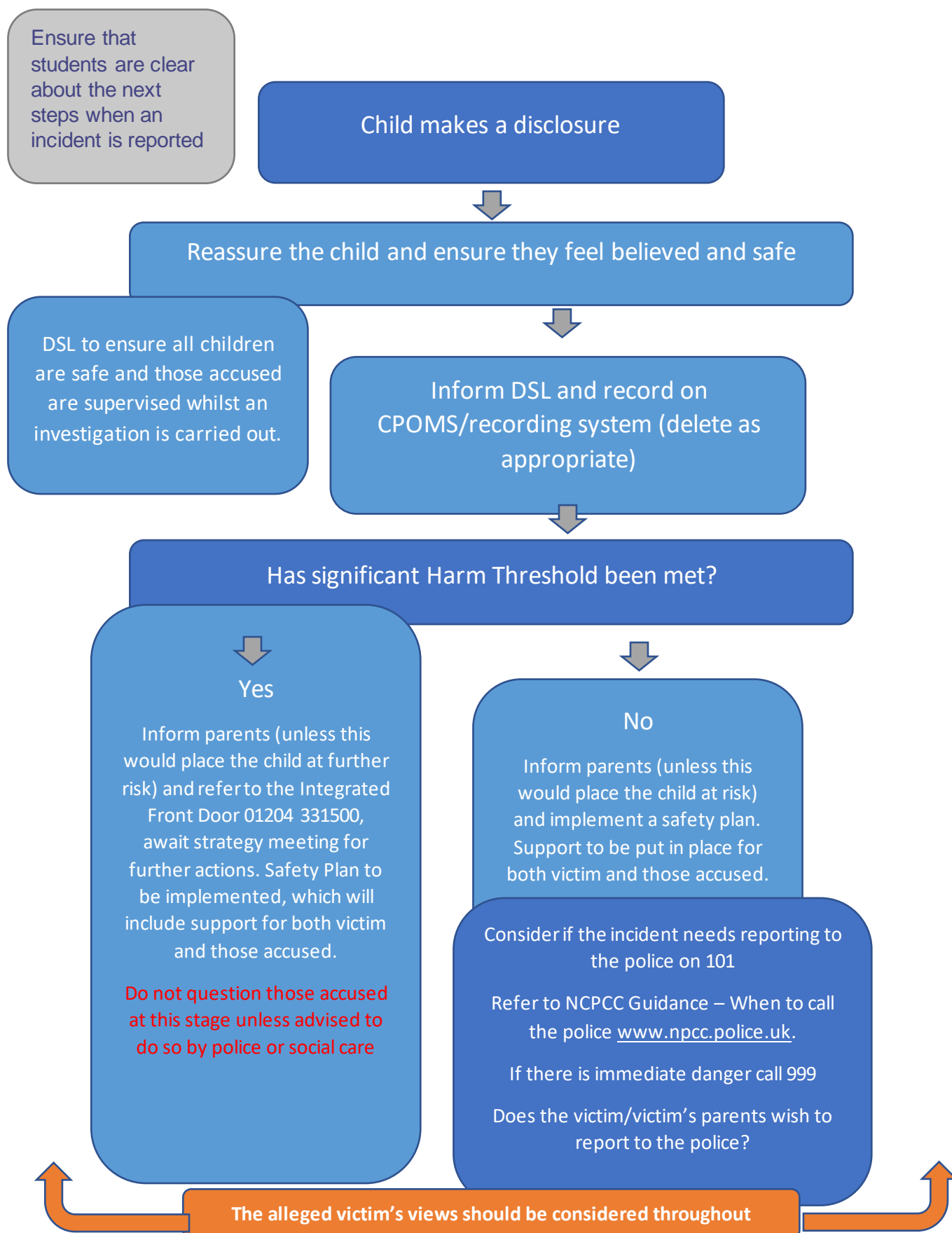
You should ensure that the child and their family continues to be supported and kept safe while awaiting resolution.

If you know there is an Early Help Assessment and Plan open but you are not the Lead Professional, you should tell the Lead Professional about the action you have taken and why as soon as possible; if you are not sure if there is an Early Help Assessment you can check with the Early Help Access Point who will let you know and share details of the Lead Professional where one is identified – it would be good practice to share this information with the Lead Professional. If you are the current Lead Professional making the referral and there is an Early Help Assessment and Plan in place, this should be updated to include the referral information - this helps to avoid duplication and gives the social worker the best possible information from which to start their assessment. Remember to also send a secure copy to the Early Help team at [BoltonISA@bolton.gov.uk](mailto:BoltonISA@bolton.gov.uk)

## Appendix 11 Encompass flow chart



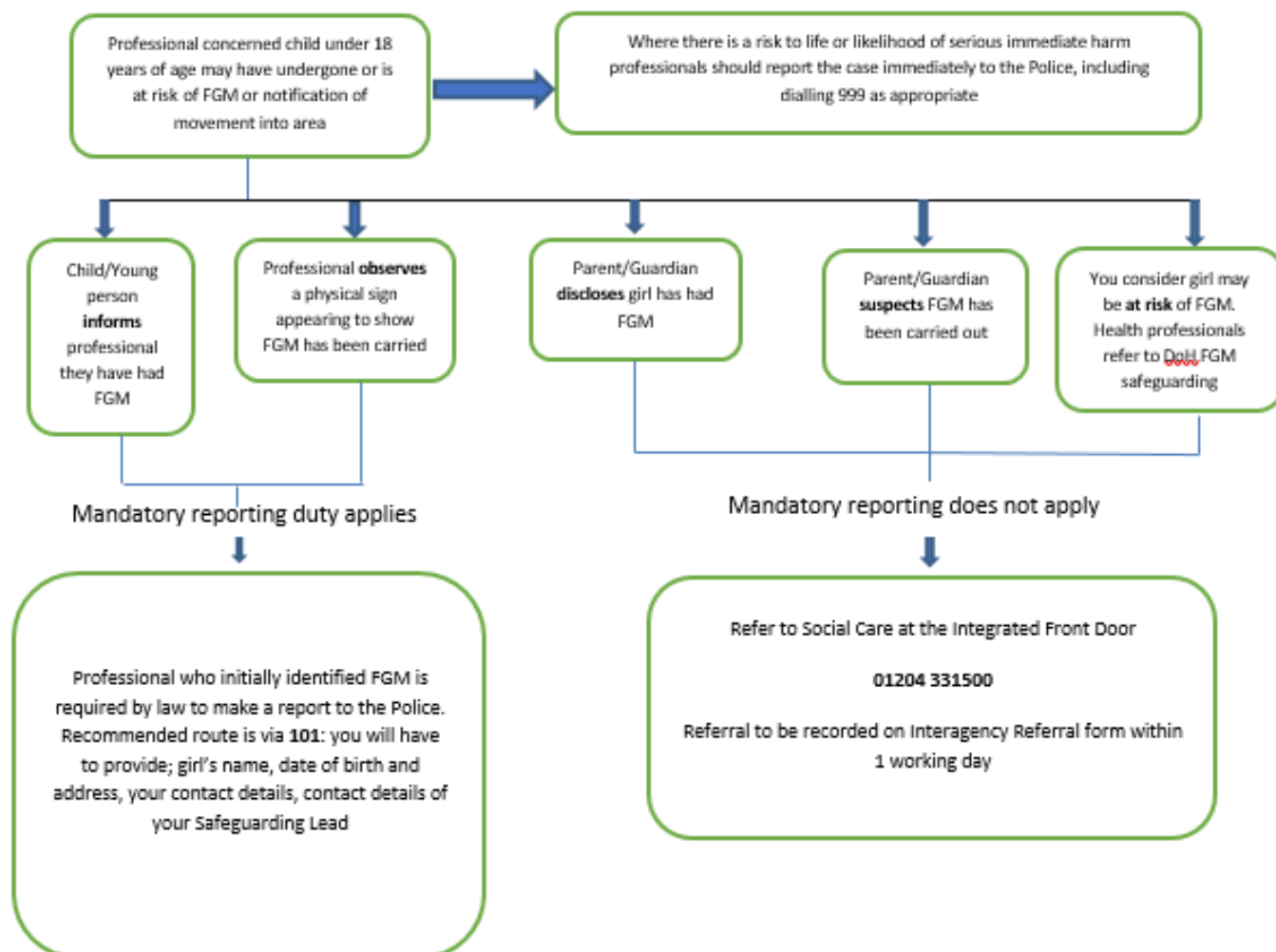
## Appendix 12 Child on child Abuse, Sexual Violence and Harassment Flowchart





## Appendix 13 FGM Flow Chart

### REPORTING FEMALE GENITAL MUTILATION



**NB:** Staff must not examine the girl and must not inform parents of the concerns without seeking advice from Social Care or the police